
NORTH SENECA

SOLAR PROJECT

APPENDIX 9-A

Cultural Resources Agency/Stakeholder Correspondence

ORES Permit Application No. 23-00036

REDACTED

REVISION 1

Project Name: North Seneca Solar Project

EDR Project No: 22059

Prepared By: EDR

Date: August 26, 2024

Summary of Cultural Resources-Related Correspondence

Date	Sender	Recipient(s)	Content
August 9, 2022	EDR on behalf of North Seneca Solar Project, LLC (Applicant)	New York State Office of Parks, Recreation and Historic Preservation (NYSHPO)	Formal consultation initiated with NYSHPO via the Cultural Resources Information System (CRIS) website (EDR, 2022a).
August 10, 2022	NYSHPO	EDR; Applicant	Response to initial request for consultation and request for Phase IA archaeological survey (NYSHPO, 2022a).
August 10, 2022	NYSHPO	EDR; Applicant	Response to initial request for consultation and request for a historic resources survey methodology (NYSHPO, 2022b).
November 9, 2022	EDR	NYSHPO; Cayuga Nation; Seneca Nation of Indians; Tonawanda Seneca Nation	<i>Phase IA Archaeological Survey</i> (EDR, 2022b) and Project Introduction Letters (EDR, 2022c).
December 2, 2022	NYSHPO	EDR	Request for survey area shapefile (NYSHPO, 2022c).
December 5, 2022	EDR	NYSHPO	Facility Site shapefile submitted per NYSHPO's request (EDR, 2022d).
December 19, 2022	NYSHPO	EDR	Response to <i>Phase IA Archaeological Survey</i> and approval of Phase IB testing methodology (NYSHPO, 2022d).
July 31, 2023	EDR	Seneca County Historian, Town of Junius Historian, Town of Waterloo Historian, Waterloo Library & Historical Society	Local stakeholder consultation initiated in order to identify potential historic resources located within the Historic Resources Study Area.
August 25, 2023	EDR	NYSHPO	<i>Phase IA Historic Resources Survey Methodology</i> (EDR, 2023a).
August 30, 2023	NYSHPO	EDR	Response to <i>Phase IA Historic Resources Survey Methodology</i> and request for a Historic Resources Survey (NYSHPO, 2023a).

Date	Sender	Recipient(s)	Content
October 12, 2023	EDR	NYSHPO	Request for Stakeholder Input on Visually Sensitive Resources and Representative Viewpoints (EDR, 2023b).
October 25, 2023	NYSHPO	EDR	<i>New York State Historic Preservation Office Guidelines for Solar Facility Development Cultural Resources Survey Work</i> (NYSHPO, 2023b).
January 5, 2024	EDR	NYSHPO	<i>Historic Resources Survey Report and Effects Assessment</i> (EDR, 2024a).
January 5, 2024	EDR	NYSHPO	<i>Phase IB Archaeological Survey</i> (EDR, 2024b).
January 8, 2024	EDR	Cayuga Nation; Seneca Nation of Indians; Tonawanda Seneca Nation	<i>Phase IB Archaeological Survey</i> (EDR, 2024b).
January 30, 2024	NYSHPO	EDR; Applicant; ORES	Response to Historic Resources Survey Report and request to review Article VIII Application Exhibits 8 and 9 (NYSHPO, 2024a).
February 2, 2024	NYSHPO	EDR; Applicant; ORES	Response to <i>Phase IB Archaeological Survey</i> and request for an Archeological Avoidance Plan (NYSHPO, 2024b).
February 26, 2024	EDR	NYSHPO	<i>Archaeological Avoidance Plan</i> (EDR, 2024c).
February 26, 2024	Cayuga Nation	EDR	Acknowledgement of receipt of <i>Archaeological Avoidance Plan</i> (CN, 2024a).
March 5, 2024	EDR	NYSHPO	<i>Exhibit 8 Visual Impacts and Exhibit 9 Cultural Resources</i> (EDR, 2024d).
March 13, 2024	Seneca Nation of Indians	EDR	Response to <i>Archaeological Avoidance Plan</i> stating that the Nation had no comments (SNI, 2024a).
March 14, 2024	Cayuga Nation	EDR	Response to <i>Archaeological Avoidance Plan</i> stating that the Nation does not object to the Project (CN, 2024b).
March 25, 2024	NYSHPO	EDR	Acceptance of <i>Archaeological Avoidance Plan</i> (NYSHPO, 2024c).
April 12, 2024	NYSHPO	EDR	Finding of Adverse Impact and request for removal of vegetative screening at two locations from the planting plan (NYSHPO, 2024d).

Date	Sender	Recipient(s)	Content
May 24, 2024	NYSHPO	EDR	Email correspondence stating vegetative screening Module 4 may be used in areas where NYSHPO previously requested removal of screening from planting plan (NYSHPO, 2024e).
July 24, 2024	EDR	NYSHPO	<i>Supplemental Phase IB Archaeological Survey</i> (EDR, 2024e).
July 29, 2024	EDR	Cayuga Nation; Seneca Nation of Indians; Tonawanda Seneca Nation	<i>Supplemental Phase IB Archaeological Survey</i> (EDR, 2024e).
August 13, 2024	Seneca Nation of Indians	EDR	Response to <i>Supplemental Phase IB Archaeological Survey</i> stating that the Nation had no comments (SNI, 2024b).
August 14, 2024	NYSHPO	EDR	Acceptance of <i>Supplemental Phase IB Archaeological Survey</i> (NYSHPO, 2024f).

References Cited

Cayuga Nation (CN). 2024a. Response from Chief Sam George concerning *Archaeological Avoidance Plan*. Via email, February 26, 2024.

CN. 2024b. Response from Mr. Clint Halftown concerning *Archaeological Avoidance Plan*. Via email, March 14, 2024.

Environmental Design and Research, Landscape Architecture, Engineering, and Environmental Services, D.P.C. (EDR). 2022a. Request for NYSHPO Consultation, North Seneca Solar Project, Towns of Junius and Waterloo, Seneca County, New York. Submitted to NYSHPO by EDR, Syracuse, NY. Via CRIS, August 9, 2022.

EDR. 2022b. *Phase IA Archaeological Survey, North Seneca Solar Project, Towns of Junius and Waterloo, Seneca County, New York*. Prepared for North Seneca Solar Project, LLC by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. November 2022.

EDR. 2022c. Project Introduction Letters from Andrea Zlotucha Kozub (EDR) to Chief Sam George (Cayuga Nation), Clint Halftown (Cayuga Nation), Dr. Joe Stahlman (Seneca Nation of Indians),

and Chief Roger Hill and Christine Abrams (Tonawanda Seneca Nation). Via email, November 9, 2022.

EDR. 2022d. Facility Site shapefile. Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. Via CRIS, December 5, 2022.

EDR. 2023a. *Phase IA Historic Resources Survey Methodology, North Seneca Solar Project, Towns of Junius and Waterloo, Seneca County, New York*. Prepared for North Seneca Solar Project, LLC by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. August 2023.

EDR. 2023b. RE: North Seneca Solar Project (ORES Matter No. Pending), Towns of Junius and Waterloo, Seneca County, New York, Official Request for Stakeholder Input on Visually Sensitive Resources and Representative Viewpoints. Letter from Jessey Horvat (EDR) to NYSHPO. Via CRIS, October 12, 2023.

EDR. 2024a. *Historic Resources Survey Report and Effects Assessment, North Seneca Solar Project, Towns of Junius and Waterloo, Seneca County, New York*. Prepared for North Seneca Solar Project, LLC by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. January 2024.

EDR, 2024b. *Phase IB Archaeological Survey, North Seneca Solar Project, Towns of Junius and Waterloo, Seneca County, New York*. Prepared for North Seneca Solar Project, LLC by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. January 2024.

EDR. 2024c. *Archaeological Avoidance Plan, North Seneca Solar Project, Towns of Junius and Waterloo, Seneca County, New York*. Prepared for North Seneca Solar Project, LLC by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. February 2024.

EDR, 2024d. *North Seneca Solar Project, Exhibit 8 Visual Impacts and Exhibit 9 Cultural Resources*. Prepared for North Seneca Solar Project, LLC by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. March 2024.

EDR, 2024e. *North Seneca Solar Project, 22PR05554, Matter No. 23-00036, Revised Facility Layout*. Prepared for North Seneca Solar Project, LLC by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. July 2024.

New York State Office of Parks, Recreation and Historic Preservation (NYSHPO). 2022a. Re: Solar Facility Archaeology Comments, Phase IA Archaeological Survey Recommendations/Sensitivity Model, North Seneca Solar Project/105 MW/1909 Acres, 22PR05554. Review correspondence from Bradley Russell (NYSHPO) to EDR. NYSHPO, Waterford, NY. Via CRIS, August 10, 2022.

NYSHPO. 2022b. Re: Project 22PR05554: North Seneca Solar Project/105 MW/1909 Acres. Review correspondence from Virginia Bartos (NYSHPO) to EDR. NYSHPO, Waterford, NY. Via CRIS, August 10, 2022.

NYSHPO. 2022c. Review correspondence from Bradley Russell (NYSHPO) to EDR. NYSHPO, Waterford, NY. Via CRIS, December 2, 2022.

NYSHPO. 2022d. Review correspondence from Bradley Russell (NYSHPO) to EDR. NYSHPO, Waterford, NY. Via CRIS, December 19, 2022.

NYSHPO. 2023a. Review correspondence from Virginia Bartos (NYSHPO) to EDR. NYSHPO, Waterford, NY. Via CRIS, August 30, 2023.

NYSHPO. 2023b. Review correspondence from Virginia Bartos (NYSHPO) to EDR. NYSHPO, Waterford, NY. Via CRIS, October 25, 2023.

NYSHPO. 2024a. Review correspondence from Robyn Sedgwick (NYSHPO) to EDR. NYSHPO, Waterford, NY. Via CRIS, January 30, 2024.

NYSHPO. 2024b. Review correspondence from Bradley W. Russell (NYSHPO) to EDR. NYSHPO, Waterford, NY. Via CRIS, February 2, 2024.

NYSHPO. 2024c. Review correspondence from Bradley W. Russell (NYSHPO) to EDR. NYSHPO, Waterford, NY. Via CRIS, March 25, 2024.

NYSHPO. 2024d. Review correspondence from Robyn Sedgwick (NYSHPO) to EDR. NYSHPO, Waterford, NY. Via CRIS, April 12, 2024.

NYSHPO. 2024e. Review correspondence from Robyn Sedgwick (NYSHPO) to EDR. NYSHPO, Waterford, NY. Via email, May 24, 2024.

NYSHPO. 2024f. Review correspondence from Bradley W. Russell (NYSHPO) to EDR. NYSHPO, Waterford, NY. Via CRIS, August 14, 2024.

Seneca Nation of Indians (SNI). 2024a. Response from Dr. Joseph Stahlman concerning *Archaeological Avoidance Plan*. Via email, March 13, 2024.

SNI. 2024b. Response from Mr. Scott Abrams concerning *Supplemental Phase IB Archaeological Survey*. Via email, August 13, 2024.

Memorandum

To: Virginia Bartos, Survey & National Register Unit
Bradley Russell, Archaeology Unit
New York State Office of Parks, Recreation and Historic Preservation
Division for Historic Preservation

From: Douglas Pippin
Senior Project Manager, Archaeology
EDR

Date: August 9, 2022

Reference: Request for NYSHPO Consultation
North Seneca Solar Project
Towns of Junius and Waterloo, Seneca County, New York

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

Description of the Facility

The North Seneca Solar Project is a proposed 105-megawatt, solar, photovoltaic energy generating project located within the Towns of Junius and Waterloo, Seneca County, New York. The regional Facility location and Facility Site boundary are depicted on Figures 1 and 2, respectively. Not all land included in the Facility Site will ultimately be developed as part of the Facility.

The Facility Site is expected to include approximately 1,909 acres of leased or purchased private land. The Facility will consist of ground-mounted photovoltaic arrays totaling more than 200 acres, along with associated infrastructure. The location of the Facility Site and Facility components will be identified in detail in a forthcoming application to the New York State Office of Renewable Energy Siting (ORES) under Section 94-c of the New York State Executive Law as authorized by Public Service Law Section 162.

Archaeological Surveys

Proposed construction of the Facility will include ground disturbing activities that have the potential to impact archaeological resources. However, relative to other types of energy generation projects, utility-scale solar facilities present a lower risk for impacts to archaeological resources due to their comparatively minimal amount of ground disturbance required during construction and operation. It is anticipated that the site design and construction elements to be used in constructing the Facility will minimize the need for soil disturbance wherever possible, by shifting the Facility components and by utilizing low-impact construction methods.

EDR will conduct a Phase IA Archaeological Survey for review and approval by the NYSHPO, in accordance with 19 NYCRR § 900-2.10 (Exhibit 9: Cultural Resources) and in support of the project's Section 94-c application.

All archaeological studies will be conducted under the supervision of a Registered Professional Archaeologist in a manner consistent with the NYSHPO's *Phase I Archaeological Report Format Requirements*¹ and the New York Archaeological Council's *Standards for Cultural Resource Investigations and Curation of Archaeological Collections in New York State*.²

Historic Resources Survey

Construction of the Facility is not anticipated to require the demolition or physical alteration of any aboveground historic properties. As the Facility is planned to be constructed almost entirely on open agricultural or wooded lands, no direct physical impacts to historic properties are anticipated to occur as a result of the Facility. However, the Facility's construction may result in a change (resulting from the introduction of PV panels or other Facility components) in the visual or auditory setting associated with a given historic property. Historic properties are defined herein to include buildings, districts, objects, structures and/or sites that have been listed in or have been determined eligible for listing in the S/NRHP.

The NYSHPO *Guidelines for Solar Facility Development Cultural Resources Survey Work*³ (hereafter, NYSHPO *Solar Guidelines*) established the following preliminary guidance for the assessment of historic and cultural resources associated with the development of ground-mounted solar facility projects covering more than 200 acres in New York State:

¹ NYSHPO. 2005. *New York State Historic Preservation Office (NYSHPO) Phase I Archaeological Report Format Requirements*. New York State Historic Preservation Office, Waterford, NY.

² New York Archaeological Council. 1994. *Standards for Cultural Resources Investigations and the Curation of Archaeological Collections in New York State*. New York State Office of Parks, Recreation, and Historic Preservation, Waterford, NY.

³ NYSHPO. 2021. *Guidelines for Solar Facility Development Cultural Resources Survey Work*. New York State Historic Preservation Office, Waterford, NY. July 2021.

Visual Impact Area for Historic Resources

Establish a project Zone of Visual Impact ("ZVI")⁴ and analyze potential impacted cultural and historic resources as follows:

3. *Solar arrays covering more than 200 acres.*
 - a. *Establish a ZVI boundary by completing a GIS analysis of areas that will have positive visibility of the solar field based upon topography and estimated existing vegetation heights.*
 - b. *A survey^{***} of all properties 50 years old or older within 1-mile of the solar array ZVI should be completed by a 36 CFR 61 qualified consultant.*

**** The determined distance of survey from the solar field is for those areas that fall within the ZVI as established by the GIS analysis only. Qualified (36 CFR 61) consultants are required to document only those properties that in their professional opinion may meet the National Register criteria.*

To ensure that potential visual effects on regional visually sensitive historic resources are adequately considered in the application process, and consistent with the NYSHPO *Solar Guidelines*, areas of potential Facility visibility within a 1-mile area around the Facility Site will be evaluated in all support studies related to aboveground historic resources (see Figure 3).

The Historic Resources Study Area is defined as the area within 1 mile of the Facility's participating parcel boundaries (i.e., the Facility Site) and will be used for the purpose of identifying historic resources and evaluating visibility and potential visual impacts to those resources listed in or determined by NYSHPO to be eligible for listing in the S/NRHP. The APE for Visual Effects on historic resources includes those areas where the Facility may result in visual effects on cultural resources. As presently envisioned, the APE for Visual Effects would be confined to areas where the Facility would be visible (based on a viewshed analysis considering topography and estimated existing vegetation heights).

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

Summary

EDR has provided this request for consultation to the NYSHPO in advance of submitting cultural resources surveys for the Facility. If you have any questions or require additional information,

⁴ The Zone of Visual Influence for impacts to above-ground historic resources as defined in the NYSHPO *Solar Guidelines* is synonymous with the Area of Potential Effect for Visual Effects.

please contact me at dpippin@edrdpc.com or (585) 752-6147, or Patrick Heaton at pheaton@edrdpc.com or (315) 471-0688. Thank you very much for your time.

Sincerely,

A handwritten signature in black ink that reads "Douglas Pippin". The signature is written in a cursive style.

Douglas J Pippin, PhD, RPA
EDR Senior Project Manager, Archaeology

Attachments:

- Figure 1. Regional Facility Location
- Figure 2. Facility Site
- Figure 3. Historic Resources Study Area

Figure 1. Regional Facility Location



North Seneca Solar Project

Towns of Junius and Waterloo,
Seneca County, New York

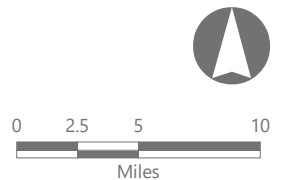
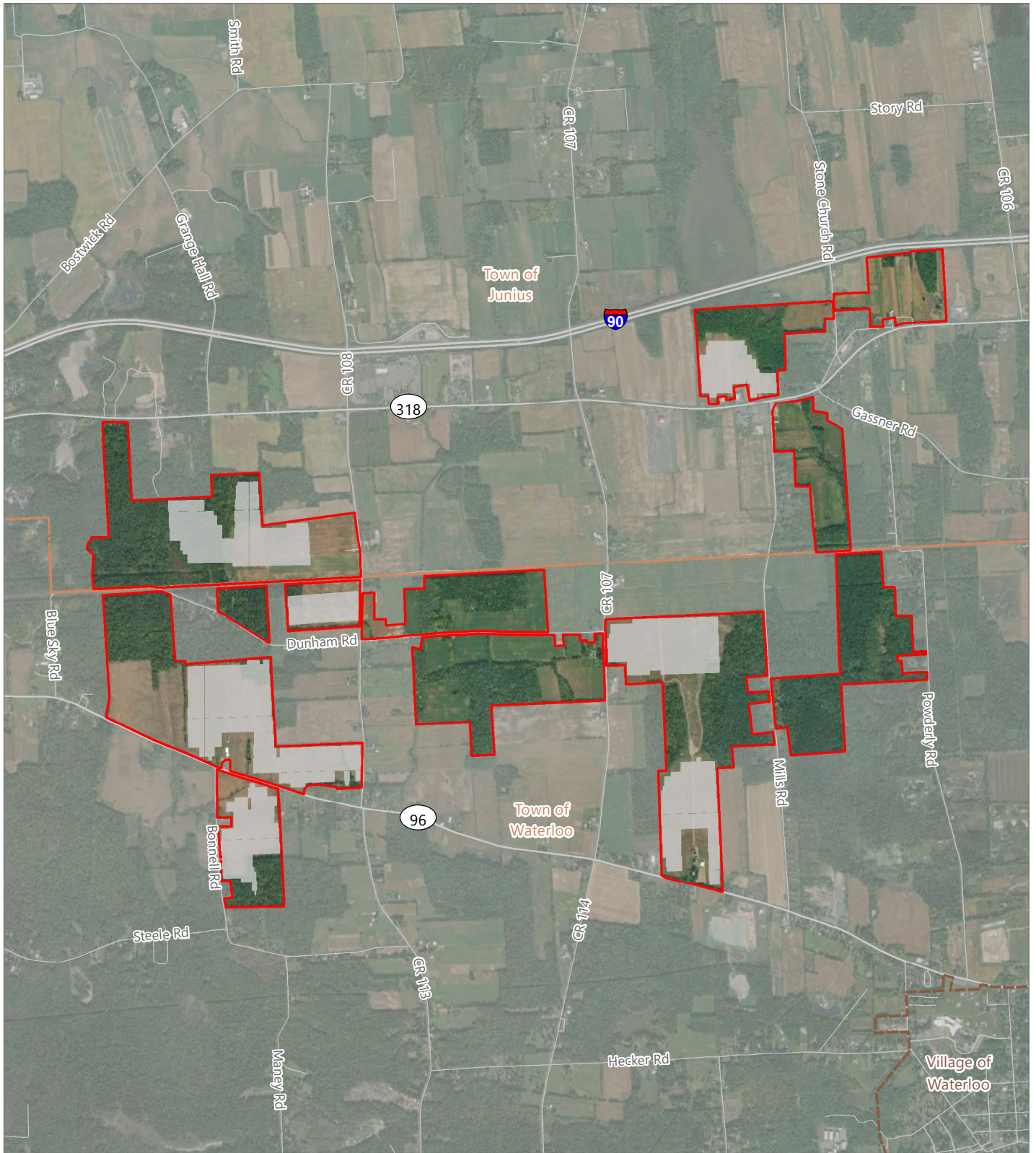


Figure 2. Facility Site



North Seneca Solar Project

Towns of Junius and Waterloo,
Seneca County, New York

- Preliminary PV Panel Layout
- Facility Site

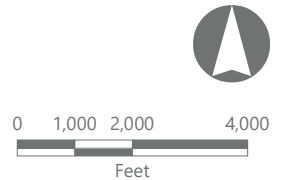
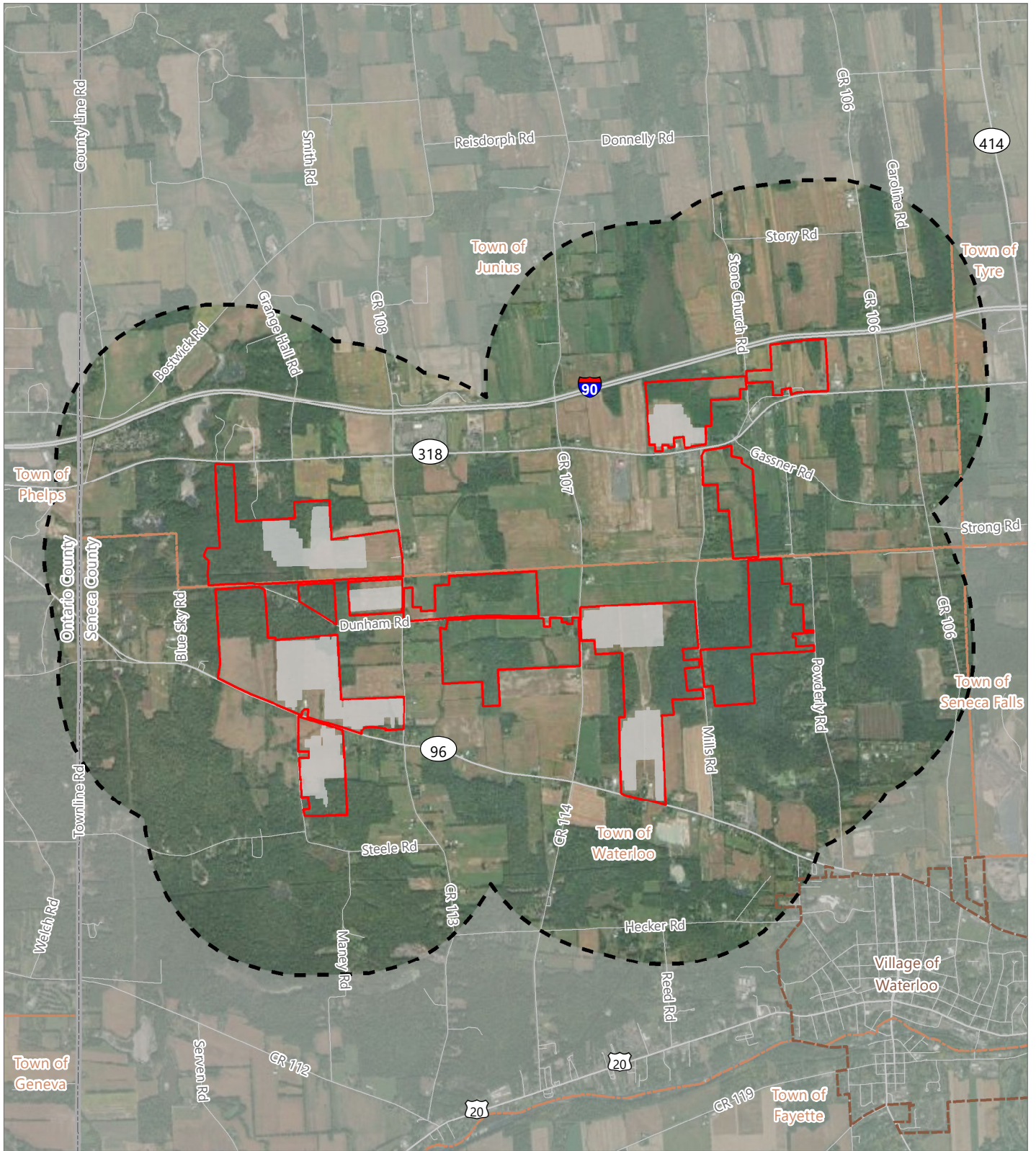


Figure 3. Historic Resources Study Area



North Seneca Solar Project

Towns of Junius and Waterloo,
Seneca County, New York

- Preliminary PV Panel Layout
- Facility Site
- Historic Resources Study Area



**Parks, Recreation
and Historic Preservation****ANDREW M. CUOMO**
Governor**ERIK KULLESEID**
Commissioner**SOLAR FACILITY ARCHAEOLOGY COMMENTS****Phase IA Archaeological Survey Recommendations/Sensitivity Model****Project: North Seneca Solar Project/105 MW/1909 Acres****PR#: 22PR05554****Date: 8/10/2022**

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

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

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

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

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

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



View and/or Address a Response


Project 22PR05554: North Seneca Solar Project/105 MW/1909 Acres (KEFAEJ2ANL21)

View Project

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

Review Responses		
Reviewer	Review Type	Response
Bradley Russell	Archaeology	The project is located in an archaeologically sensitive area and it is the opinion of OPRHP that a Phase IA archeological survey is warranted. Please review the specific information request(s) below and click the Process button to respond to each request.
Virginia Bartos	Survey and Evaluation	In order for SHPO to complete our evaluation of the historic significance of all buildings/structures/districts within or adjacent to your project area, we need further information. Please review the specific information request(s) below and click the Process button to respond to each request.

Information Requests							
Process	Status	Reviewer	Review Type	Request Type	Request Entity	Request Item	Request Description
	Information Requested	Bradley Russell	Archaeology	Request a New Attachment, Photo, or Survey for this Consultation Project		Archaeology Survey	Phase IA archaeological survey requested
	Information Requested	Virginia Bartos	Survey and Evaluation	Request a New Attachment, Photo, or Survey for this Consultation Project		Building Survey	For solar arrays covering more than 200-acres, establish a project Zone of Visual Impact ("ZVI") through a GIS analysis of areas that will have positive visibility of the solar field based upon topography only (do not factor in vegetation). Survey all properties (buildings, structures, sites, historic districts) 50-years old or older within 1-mile of the solar array ZVI. Survey should be completed by a 36 CFR 61 qualified consultant as the surveyor needs to be 36 CFR 61 qualified to make determinations of National Register eligibility. Surveyor will submit the proposed ZVI and Methodology/Survey Work Plan to CRIS prior to undertaking any survey field work. Survey will include all properties within the ZVI that were previously determined eligible for inclusion in or are already listed in the New York State and National Registers of Historic Places using the Division's Cultural Resource Information System (CRIS). Documentation must include, at a minimum, clear digital images taken from ground level and showing the front and sides of the main building and any associated outbuildings; address and map location; and date of construction (if known), and eligibility (if known). For questions about this survey request, contact virginia.bartos@parks.ny.gov.

Attachments						
Attachment	Reviewer	Review Type	Type	Name	Description	
	Bradley Russell	Archaeology	Document	Phase IA archaeological survey requested	Phase IA archaeological survey guidance	



November 9, 2022

Chief Sam George
Cayuga Nation Council
Cayuga Nation
P.O. Box 433
Union Springs, NY 13160

Email: sevenclansam@gmail.com

**RE: North Seneca Solar Project
Towns of Junius and Waterloo, Seneca County, New York
Cultural Resources Surveys and Environmental Review**

Dear Chief George:

North Seneca Solar, LLC is currently planning, designing, and conducting environmental permitting studies for the proposed North Seneca Solar Project and would like to invite the Cayuga Nation to begin a discussion about the project. The North Seneca Solar Project is a proposed solar energy generating facility (the Facility) in the Towns of Junius and Waterloo in Seneca County (see Figure 1). We are aware that the Facility is located within traditional Cayuga territory. We hope to initiate a dialogue with the Nation regarding the protection of archaeological sites, historic properties, or other sensitive cultural areas.

The Facility would be built within a total leased parcel area of approximately 1,900 acres (the Facility Site; see Figure 2), but will not encompass all of the land included in the Facility Site. The Area of Potential Effect (i.e., the limits of disturbance) for the Facility represents the specific parcels, or portions thereof, where Facility components and infrastructure will be located. This provides flexibility during Facility development to minimize and avoid potential impacts to cultural resources, visual resources, wetlands, wildlife habitat, and other sensitive resources.

The Facility will consist of photovoltaic panel arrays, access roads, collection lines, and associated infrastructure with a total generating capacity of up to 105 megawatts. The Facility Site consists primarily of active and fallow agricultural land, and second-growth forest.

North Seneca Solar, LLC is seeking a Siting Permit to construct the Facility from New York State through the Office of Renewable Energy Siting (ORES), which issues permits for major renewable energy facilities under Section 94-c of the New York State Executive Law. In addition to consolidating the environmental review process for major renewable energy facilities, Section 94-c ensures that siting decisions are predictable, responsible, delivered in a timely manner, and provide opportunities for stakeholder input.

The Siting Permit Application being prepared for the Facility will include engineering plans and the results of various environmental and cultural resources studies. Once the Siting Permit Application is developed, it will be publicly available at local libraries, on North Seneca Solar, LLC's website (forthcoming), and on the ORES website. The North Seneca Solar Project website will be updated with those locations and application repository hours when available. An additional repository can be created at a location convenient to your community upon request.

For your reference, North Seneca Solar, LLC's Point of Contact for the project is:

Jason Funk
Director of Permitting & Environmental
Savion, LLC
422 Admiral Blvd.
Kansas City, MO 64106
Email: jfunk@savionenergy.com
Phone: 816.421.9598

We are preparing cultural resources studies for the Facility and are providing our preliminary schedule for these studies to facilitate discussion:

- Phase IA Archaeological Survey Report (November 2022, enclosed)
- Historic Resources Survey Methodology Report (anticipated Fall/Winter 2022)
- Historic resources survey fieldwork (anticipated Winter 2023)
- Phase IB archaeological fieldwork (anticipated Spring 2023)
- Historic Resources Survey Report (anticipated Spring 2023)
- Phase IB Archaeological Survey Report (anticipated Summer 2023)
- Siting Permit Application (t.b.a.)

Please provide any cultural resource comments to Kristy Primeau (ORES) at the below address and copy the New York State Historic Preservation Office (NYSHPO) contact, below.

Kristy E. Primeau, Ph.D., RPA
Agency Preservation Officer, Renewable Energy Siting Specialist 3
Office of Renewable Energy Siting
W.A. Harriman Campus – Building 9
1200 Washington Avenue
Albany, NY 12226
kristy.primeau@ores.ny.gov

We sincerely appreciate the opportunity to work with you on this project. If you have any questions or require additional information, please contact me at azlotuchakozub@edrdpc.com or 315-246-5384 or Patrick Heaton at pheaton@edrdpc.com or (315) 471-0688. We are confident that the North Seneca Solar Project can be developed in a manner that is respectful and mindful of Cayuga Nation heritage.

Sincerely,



Andrea Zlotucha Kozub
EDR Project Manager, Cultural Resources

Attachments:

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

Copies to:

- Bradley Russell (NYSHPO) – bradley.russell@parks.ny.gov

Figure 1. Regional Facility Location



North Seneca Solar Project

Towns of Junius and Waterloo,
Seneca County, New York

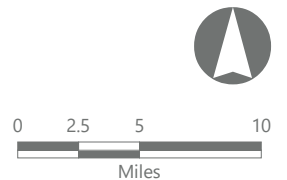
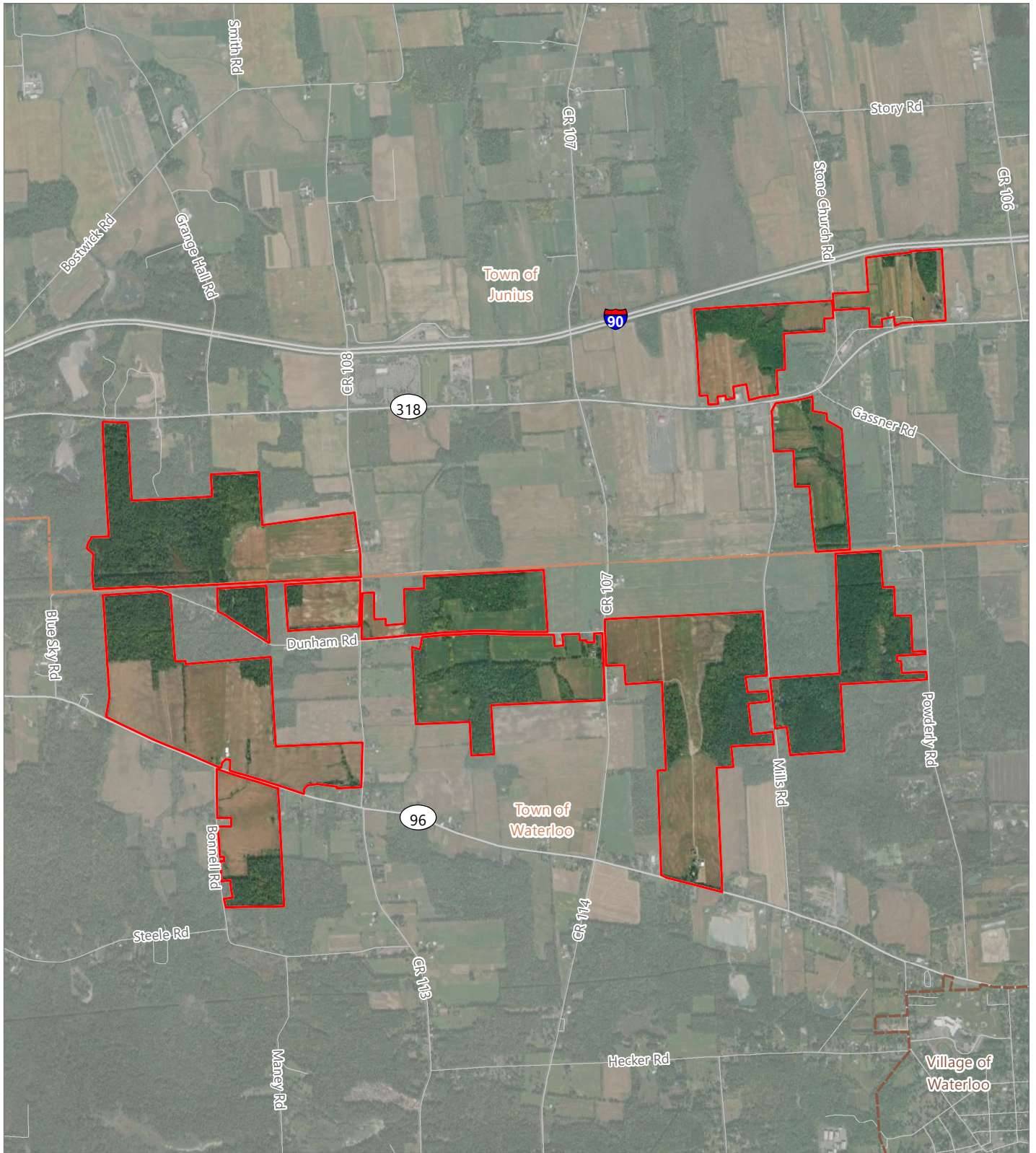



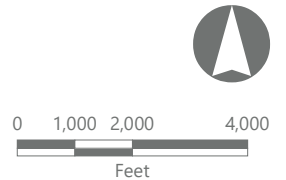
Figure 2. Facility Site



North Seneca Solar Project

Towns of Junius and Waterloo,
Seneca County, New York

 Facility Site





November 9, 2022

Mr. Clint Halftown
Cayuga Nation
P.O. Box 803
Seneca Falls, NY 13148

Email: clint.halftown@gmail.com
c/o sharon.leroy@cayuganation-nsn.gov

**RE: North Seneca Solar Project
Towns of Junius and Waterloo, Seneca County, New York
Cultural Resources Surveys and Environmental Review**

Dear Mr. Halftown:

North Seneca Solar, LLC is currently planning, designing, and conducting environmental permitting studies for the proposed North Seneca Solar Project and would like to invite the Cayuga Nation to begin a discussion about the project. The North Seneca Solar Project is a proposed solar energy generating facility (the Facility) in the Towns of Junius and Waterloo in Seneca County (see Figure 1). We are aware that the Facility is located within traditional Cayuga territory. We hope to initiate a dialogue with the Nation regarding the protection of archaeological sites, historic properties, or other sensitive cultural areas.

The Facility would be built within a total leased parcel area of approximately 1,900 acres (the Facility Site; see Figure 2), but will not encompass all of the land included in the Facility Site. The Area of Potential Effect (i.e., the limits of disturbance) for the Facility represents the specific parcels, or portions thereof, where Facility components and infrastructure will be located. This provides flexibility during Facility development to minimize and avoid potential impacts to cultural resources, visual resources, wetlands, wildlife habitat, and other sensitive resources.

The Facility will consist of photovoltaic panel arrays, access roads, collection lines, and associated infrastructure with a total generating capacity of up to 105 megawatts. The Facility Site consists primarily of active and fallow agricultural land, and second-growth forest.

North Seneca Solar, LLC is seeking a Siting Permit to construct the Facility from New York State through the Office of Renewable Energy Siting (ORES), which issues permits for major renewable energy facilities under Section 94-c of the New York State Executive Law. In addition to consolidating the environmental review process for major renewable energy facilities, Section 94-c ensures that siting decisions are predictable, responsible, delivered in a timely manner, and provide opportunities for stakeholder input.

The Siting Permit Application being prepared for the Facility will include engineering plans and the results of various environmental and cultural resources studies. Once the Siting Permit Application is developed, it will be publicly available at local libraries, on North Seneca Solar, LLC's website (forthcoming), and on the ORES website. The North Seneca Solar Project website will be updated with those locations and application repository hours when available. An additional repository can be created at a location convenient to your community upon request.

For your reference, North Seneca Solar, LLC's Point of Contact for the project is:

Jason Funk
Director of Permitting & Environmental
Savion, LLC
422 Admiral Blvd.
Kansas City, MO 64106
Email: jfunk@savionenergy.com
Phone: 816.421.9598

We are preparing cultural resources studies for the Facility and are providing our preliminary schedule for these studies to facilitate discussion:

- Phase IA Archaeological Survey Report (November 2022, enclosed)
- Historic Resources Survey Methodology Report (anticipated Fall/Winter 2022)
- Historic resources survey fieldwork (anticipated Winter 2023)
- Phase IB archaeological fieldwork (anticipated Spring 2023)
- Historic Resources Survey Report (anticipated Spring 2023)
- Phase IB Archaeological Survey Report (anticipated Summer 2023)
- Siting Permit Application (t.b.a.)

Please provide any cultural resource comments to Kristy Primeau (ORES) at the below address and copy the New York State Historic Preservation Office (NYSHPO) contact, below.

Kristy E. Primeau, Ph.D., RPA
Agency Preservation Officer, Renewable Energy Siting Specialist 3
Office of Renewable Energy Siting
W.A. Harriman Campus – Building 9
1200 Washington Avenue
Albany, NY 12226
kristy.primeau@ores.ny.gov

We sincerely appreciate the opportunity to work with you on this project. If you have any questions or require additional information, please contact me at azlotuchakozub@edrdpc.com or (315) 246-5384, or Patrick Heaton at pheaton@edrdpc.com or (315) 471-0688. We are confident that the North Seneca Solar Project can be developed in a manner that is respectful and mindful of Cayuga Nation heritage.

Sincerely,



Andrea Zlotucha Kozub
EDR Project Manager, Cultural Resources

Attachments:

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

Copies to:

- Bradley Russell (NYSHPO) – bradley.russell@parks.ny.gov

Figure 1. Regional Facility Location



North Seneca Solar Project

Towns of Junius and Waterloo,
Seneca County, New York

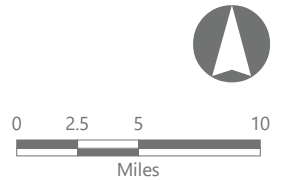
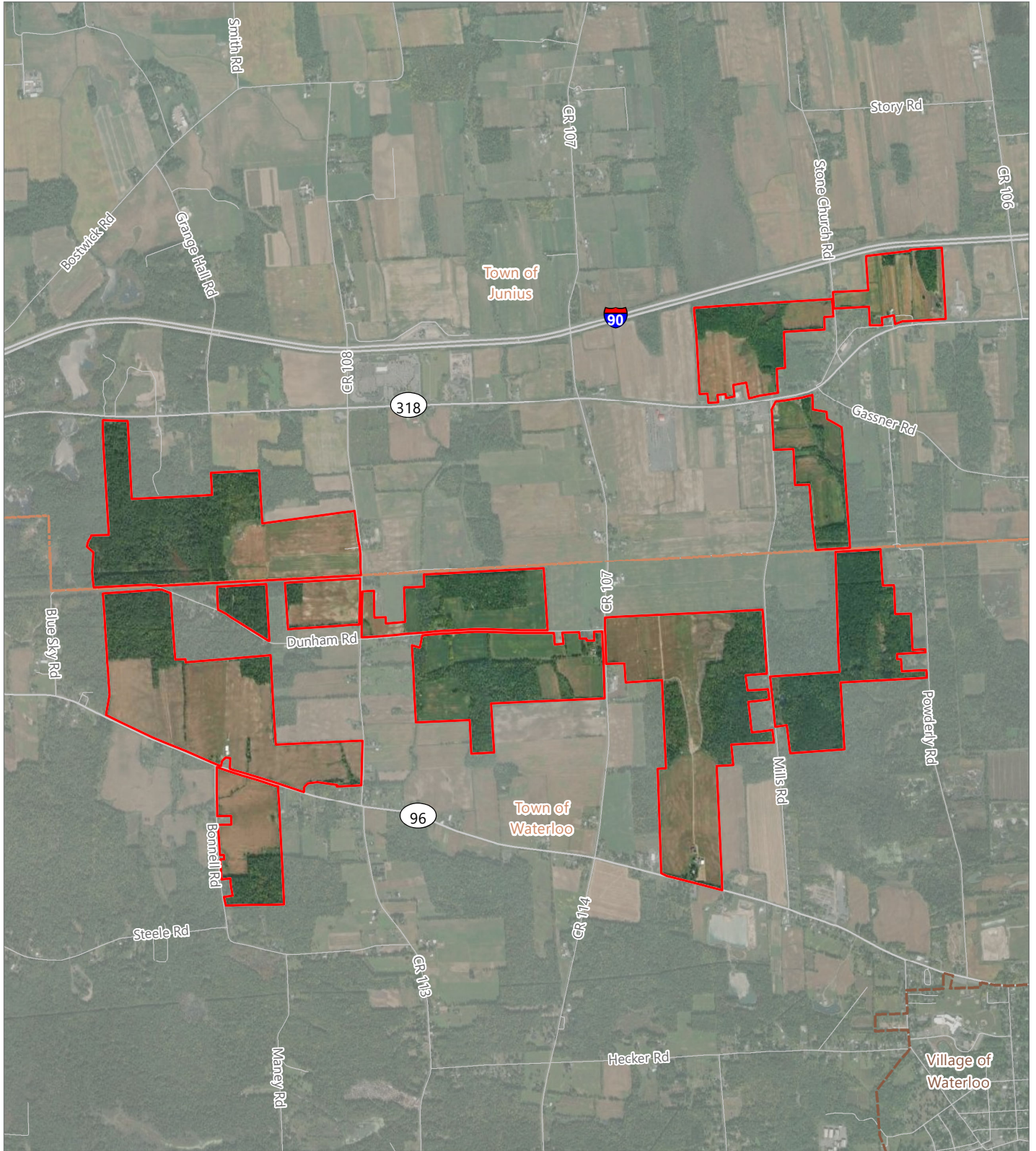



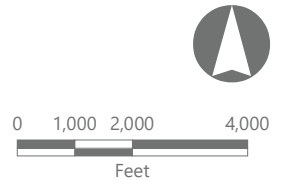
Figure 2. Facility Site



North Seneca Solar Project

Towns of Junius and Waterloo,
Seneca County, New York

 Facility Site





November 9, 2022

Dr. Joe Stahlman
Director – Tribal Historic Preservation Officer
Seneca Nation of Indians
Seneca-Iroquois National Museum
Onõhsagwë: De' Cultural Center
82 West Hetzel Street
Salamanca, NY 14779

Email: joe.stahlman@sni.org

**RE: North Seneca Solar Project
Towns of Junius and Waterloo, Seneca County, New York
Cultural Resources Surveys and Environmental Review**

Dear Dr. Stahlman:

North Seneca Solar, LLC is currently planning, designing, and conducting environmental permitting studies for the proposed North Seneca Solar Project and would like to invite the Seneca Nation of Indians to begin a discussion about the project. The North Seneca Solar Project is a proposed solar energy generating facility (the Facility) in the Towns of Junius and Waterloo in Seneca County (see Figure 1). We are aware that the Facility is located within traditional Seneca territory. We hope to initiate a dialogue with the Nation regarding the protection of archaeological sites, historic properties, or other sensitive cultural areas.

The Facility would be built within a total leased parcel area of approximately 1,900 acres (the Facility Site; see Figure 2), but will not encompass all of the land included in the Facility Site. The Area of Potential Effect (i.e., the limits of disturbance) for the Facility represents the specific parcels, or portions thereof, where Facility components and infrastructure will be located. This provides flexibility during Facility development to minimize and avoid potential impacts to cultural resources, visual resources, wetlands, wildlife habitat, and other sensitive resources.

The Facility will consist of photovoltaic panel arrays, access roads, collection lines, and associated infrastructure with a total generating capacity of up to 105 megawatts. The Facility Site consists primarily of active and fallow agricultural land, and second-growth forest.

North Seneca Solar, LLC is seeking a Siting Permit to construct the Facility from New York State through the Office of Renewable Energy Siting (ORES), which issues permits for major renewable energy facilities under Section 94-c of the New York State Executive Law. In addition to consolidating the environmental review process for major renewable energy facilities, Section 94-c ensures that siting decisions are predictable, responsible, delivered in a timely manner, and provide opportunities for stakeholder input.

The Siting Permit Application being prepared for the Facility will include engineering plans and the results of various environmental and cultural resources studies. Once the Siting Permit Application is developed, it will be publicly available at local libraries, on North Seneca Solar, LLC's website (forthcoming), and on the ORES website. The North Seneca Solar Project website will be updated with those locations and application repository hours when available. An additional repository can be created at a location convenient to your community upon request.

For your reference, North Seneca Solar, LLC's Point of Contact for the project is:

Jason Funk
Director of Permitting & Environmental
Savion, LLC
422 Admiral Blvd.
Kansas City, MO 64106
Email: jfunk@savionenergy.com
Phone: 816.421.9598

We are preparing cultural resources studies for the Facility and are providing our preliminary schedule for these studies to facilitate discussion:

- Phase IA Archaeological Survey Report (November 2022, enclosed)
- Historic Resources Survey Methodology Report (anticipated Fall/Winter 2022)
- Historic resources survey fieldwork (anticipated Winter 2023)
- Phase IB archaeological fieldwork (anticipated Spring 2023)
- Historic Resources Survey Report (anticipated Spring 2023)
- Phase IB Archaeological Survey Report (anticipated Summer 2023)
- Siting Permit Application (t.b.a.)

Please provide any cultural resource comments to Kristy Primeau (ORES) at the below address and copy the New York State Historic Preservation Office (NYSHPO) contact, below.

Kristy E. Primeau, Ph.D., RPA
Agency Preservation Officer, Renewable Energy Siting Specialist 3
Office of Renewable Energy Siting
W.A. Harriman Campus – Building 9
1200 Washington Avenue
Albany, NY 12226
kristy.primeau@ores.ny.gov

We sincerely appreciate the opportunity to work with you on this project. If you have any questions or require additional information, please contact me at azlotuchakozub@edrdpc.com or 315-246-5384, or dpippin@edrdpc.com or (585) 752-6147. We are confident that the North Seneca Solar Project can be developed in a manner that is respectful and mindful of the Seneca Nation of Indians' heritage.

Sincerely,



Andrea Zlotucha Kozub
EDR Project Manager, Cultural Resources

Attachments:

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

Copies to:

- Matthew Pagels (President) – matthew.pagels@sni.org
- Bradley Russell (NYSHPO) – bradley.russell@parks.ny.gov

Figure 1. Regional Facility Location

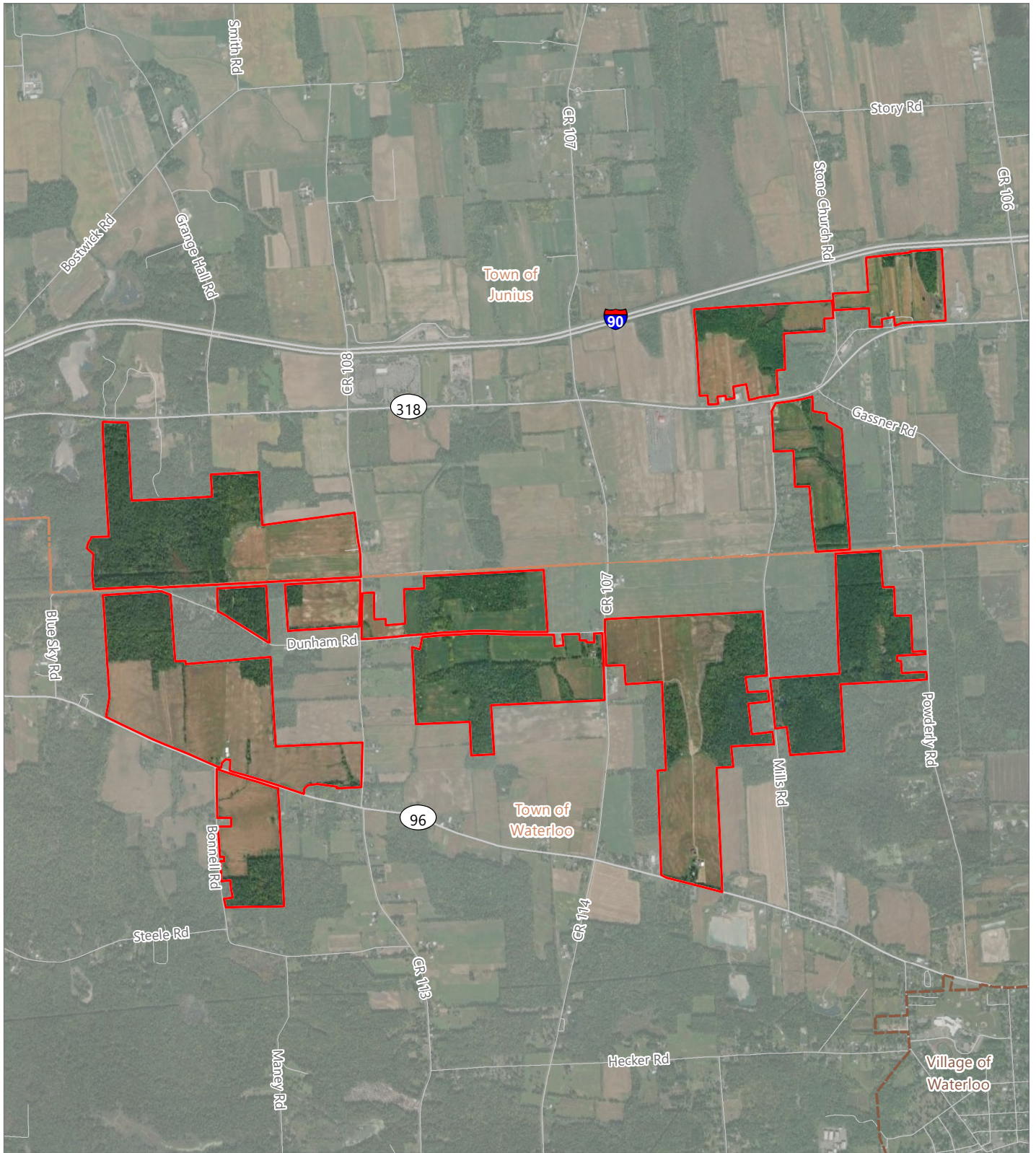


North Seneca Solar Project

Towns of Junius and Waterloo,
Seneca County, New York




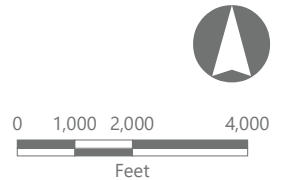
Figure 2. Facility Site



North Seneca Solar Project

Towns of Junius and Waterloo,
Seneca County, New York

 Facility Site





November 9, 2022

Chief Roger Hill and Ms. Christine Abrams
Tonawanda Seneca Nation
7027 Meadville Road
Basom, NY 14013

Email: tonseneca@aol.com

**RE: North Seneca Solar Project
Towns of Junius and Waterloo, Seneca County, New York
Cultural Resources Surveys and Environmental Review**

Dear Chief Hill and Ms. Abrams:

North Seneca Solar, LLC is currently planning, designing, and conducting environmental permitting studies for the proposed North Seneca Solar Project and would like to invite the Tonawanda Seneca Nation to begin a discussion about the project. The North Seneca Solar Project is a proposed solar energy generating facility (the Facility) in the Towns of Junius and Waterloo in Seneca County (see Figure 1). We are aware that the Facility is located within traditional Seneca territory. We hope to initiate a dialogue with the Nation regarding the protection of archaeological sites, historic properties, or other sensitive cultural areas.

The Facility would be built within a total leased parcel area of approximately 1,900 acres (the Facility Site; see Figure 2), but will not encompass all of the land included in the Facility Site. The Area of Potential Effect (i.e., the limits of disturbance) for the Facility represents the specific parcels, or portions thereof, where Facility components and infrastructure will be located. This provides flexibility during Facility development to minimize and avoid potential impacts to cultural resources, visual resources, wetlands, wildlife habitat, and other sensitive resources.

The Facility will consist of photovoltaic panel arrays, access roads, collection lines, and associated infrastructure with a total generating capacity of up to 105 megawatts. The Facility Site consists primarily of active and fallow agricultural land, and second-growth forest.

North Seneca Solar, LLC is seeking a Siting Permit to construct the Facility from New York State through the Office of Renewable Energy Siting (ORES), which issues permits for major renewable energy facilities under Section 94-c of the New York State Executive Law. In addition to consolidating the environmental review process for major renewable energy facilities, Section 94-c ensures that siting decisions are predictable, responsible, delivered in a timely manner, and provide opportunities for stakeholder input.

The Siting Permit Application being prepared for the Facility will include engineering plans and the results of various environmental and cultural resources studies. Once the Siting Permit Application is developed, it will be publicly available at local libraries, on North Seneca Solar, LLC's website (forthcoming), and on the ORES website. The North Seneca Solar Project website will be updated with those locations and application repository hours when available. An additional repository can be created at a location convenient to your community upon request.

For your reference, North Seneca Solar, LLC's Point of Contact for the project is:

Jason Funk
Director of Permitting & Environmental
Savion, LLC
422 Admiral Blvd.
Kansas City, MO 64106
Email: jfunk@savionenergy.com
Phone: 816.421.9598

We are preparing cultural resources studies for the Facility and are providing our preliminary schedule for these studies to facilitate discussion:

- Phase IA Archaeological Survey Report (November 2022, enclosed)
- Historic Resources Survey Methodology Report (anticipated Fall/Winter 2022)
- Historic resources survey fieldwork (anticipated Winter 2023)
- Phase IB archaeological fieldwork (anticipated Spring 2023)
- Historic Resources Survey Report (anticipated Spring 2023)
- Phase IB Archaeological Survey Report (anticipated Summer 2023)
- Siting Permit Application (t.b.a.)

Please provide any cultural resource comments to Kristy Primeau (ORES) at the below address and copy the New York State Historic Preservation Office (NYSHPO) contact, below.

Kristy E. Primeau, Ph.D., RPA
Agency Preservation Officer, Renewable Energy Siting Specialist 3
Office of Renewable Energy Siting
W.A. Harriman Campus – Building 9
1200 Washington Avenue
Albany, NY 12226
kristy.primeau@ores.ny.gov

We sincerely appreciate the opportunity to work with you on this project. If you have any questions or require additional information, please contact me at azlotuchakozub@edrdpc.com or (315) 246-5384, or Patrick Heaton at pheaton@edrdpc.com or (315) 471-0688. We are confident that the North Seneca Solar Project can be developed in a manner that is respectful and mindful of Tonawanda Seneca Nation heritage.

Sincerely,



Andrea Zlotucha Kozub
EDR Project Manager, Cultural Resources

Attachments:

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

Copies to:

- Alexandra Page (Attorney) – alex.c.page@gmail.com
- Bradley Russell (NYSHPO) – bradley.russell@parks.ny.gov

Figure 1. Regional Facility Location

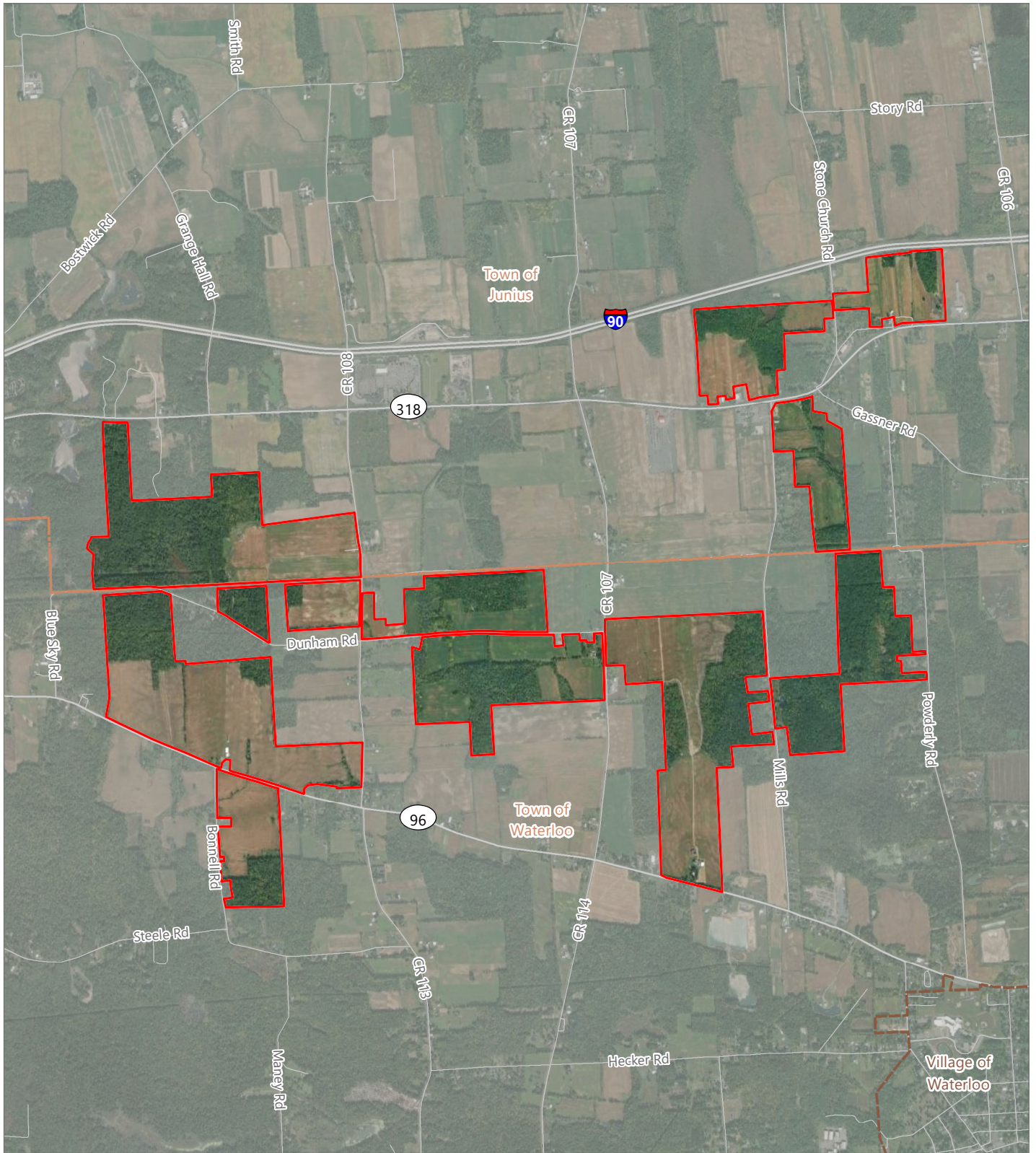


North Seneca Solar Project

Towns of Junius and Waterloo,
Seneca County, New York




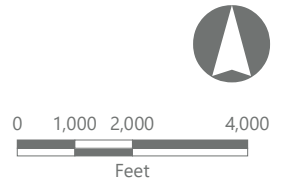
Figure 2. Facility Site



North Seneca Solar Project

Towns of Junius and Waterloo,
Seneca County, New York

 Facility Site



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

Review Responses

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

Information Requests

Process	Status	Reviewer	Review Type	Request Type	Request Entity	Request Item	Request Description
	Processed	Bradley Russell	Archaeology	Request a New Attachment for an Existing Survey	Phase IA Archaeological Survey, North Seneca Solar Project, Towns of Junius and Waterloo, Seneca County, New York. (22SR00577)	Attachment	Please provide shapefiles showing the survey area for the recently submitted Phase IA report.

From: [New York State Parks CRIS Application](#)
To: [Doug Pippin](#)
Cc: [Grant Johnson](#); [William Whipps](#); [Matthew Weiss](#); [Laurie Stubenrauch](#); ifunk@savionenergy.com; Kristy.Primeau@ores.ny.gov; [Andrea Zlotucha Kozub](#)
Subject: NY SHPO: Requested Submission 6IR8E8BYNLI7 Received for Consultation Project 22PR05554
Date: Monday, December 5, 2022 4:36:20 PM

[EXTERNAL SENDER]

Requested Submission Received

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

Requested Submission Token: 6IR8E8BYNLI7

Project Number: 22PR05554

Project Type: Consultation

Project Name: North Seneca Solar Project/105 MW/1909 Acres

Consolidated Response Token: NQISU2N88392

Previous Submission Number: 22PR05554.003

Open Request: Please provide shapefiles showing the survey area for the recently submitted Phase IA report.

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

New York State Historic Preservation Office

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

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

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

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

Who sent this email?

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

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

Why did I receive this email?

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

What do I need to do?

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

What will happen next?

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

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

What else can I do?

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

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

Where can I get help?

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

If you still have questions about CRIS, please contact CRIS Help at CRISHelp@parks.ny.gov.

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



**New York State
Parks, Recreation and
Historic Preservation**

KATHY HOCHUL
Governor

ERIK KULLESEID
Commissioner

December 19, 2022

Douglas Pippin
Senior Project Manager, Archaeology
EDR
274 North Goodman Street
Rochester, NY 14607

Re: ORES
North Seneca Solar Project/105 MW/1909 Acres
22PR05554

Dear Douglas Pippin:

Thank you for requesting the comments of the Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted materials in accordance with the New York State Historic Preservation Act of 1980 (section 14.09 of the New York Parks, Recreation and Historic Preservation Law). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8) and its implementing regulations (6NYCRR Part 617).

OPRHP has reviewed the Phase IA Archaeological Survey letter report for the North Seneca Solar Project/105 MW/1909 Acres project (22PR05554) prepared by Environmental Design & Research, D.P.C., Consulting Archaeologists (November 2022; 22SR00577).

OPRHP concurs with the report recommendation that a Phase IB Archaeological Survey is warranted, and we support the Phase IB testing strategy outlined in the report.

If you have any questions, I can be reached at Bradley.Russell@parks.ny.gov.

Sincerely,

Bradley W. Russell, Ph.D.
Historic Preservation Specialist - Archaeology



July 31, 2023

Walter J. Gable
Seneca County Historian

**RE: North Seneca Solar Project, Towns of Junius and Waterloo, Seneca County, New York
Historic Resources Survey Outreach**

Dear Mr. Gable,

As you may be aware, North Seneca Solar, LLC (the Applicant) is in the process of developing the North Seneca Solar Project (hereafter, the Facility), a proposed solar energy generation facility of up to 105 megawatts (MW) consisting of rows of photovoltaic arrays and associated infrastructure located in the Towns of Junius and Waterloo in Seneca County, New York. This Facility is being reviewed by the New York State Office of Renewable Energy Siting (ORES) under Section 94-c of the New York State Executive Law (which establishes the permitting process for large-scale renewable energy projects) and the New York State Historic Preservation Office (NYSHPO) under Section 14.09 of the New York State Parks, Recreation, and Historic Preservation Law.

As required under Section 94-c, Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C. (EDR) is conducting historic resources surveys for review by the NYSHPO, which include the identification of historic resources (e.g., historic buildings, cemeteries, and bridges) that may be eligible for the State and National Registers of Historic Places (S/NRHP), as well as the evaluation of potential visual impacts to these resources.

The Section 94-c regulations also require consultation with local historic preservation groups and federal/state-recognized Indian Nations to identify potentially historic sites or structures within the Facility's study area. The study area consists of a one-mile radius surrounding the proposed Facility and includes portions of the Towns of Junius and Waterloo in Seneca County, and a very small portion of the Town of Phelps in Ontario County, New York (see Attachment A).

The following potentially historic resources have been identified within this study area in the NYSHPO's Cultural Resources Information System (CRIS) database:



NYSHPO Identification Number	Property Name and/or Description	Address	Municipality	S/NRHP Eligibility (NYSHPO Determined)
USN 09903.000013	A farmstead with a five-bay brick Greek Revival style residence	1329 Nine Foot Road	Town of Junius	S/NRHP-Eligible (NYSHPO Determined)
USN 09910.000132	A farmstead with a two-story brick Queen Anne style residence	1067 State Route 96	Town of Waterloo	S/NRHP Eligibility Undetermined
N/A	Bowdish Cemetery, a small nineteenth-century cemetery	West of 605 State Route 96	Town of Waterloo	S/NRHP Eligibility Undetermined
N/A	Quaker Cemetery, a nineteenth-century cemetery associated with a meetinghouse (not extant) with an estimated 180 burials, including at least one Revolutionary War veteran and several members of prominent Quaker activist families	North of 1999 Nine Foot Road	Town of Waterloo	S/NRHP Eligibility Undetermined
N/A	Hubbard Cemetery, a nineteenth-century cemetery with an estimated 80 burials	West of 932 Dunham Road	Town of Waterloo	S/NRHP Eligibility Undetermined

EDR is requesting your assistance in identifying any additional buildings, structures, or sites within the study area that may derive historic significance from their association with an historical event or person(s).

Please reach out via email at cstokes@edrdpc.com, or by phone at 315-471-0688 x688 if you have any questions and/or to discuss potential historic resources within the study area. Thank you for your time and attention.

Sincerely,

Kristen Olson
Historic Preservation Project Manager

Copies to: C. Ernest Brownell, Town of Junius Historian; Sandra L. Ridley, Town of Waterloo Historian; and Cyndi Park-Sheils, Waterloo Library & Historical Society



July 31, 2023

C. Ernest Brownell
Town of Junius Historian

**RE: North Seneca Solar Project, Towns of Junius and Waterloo, Seneca County, New York
Historic Resources Survey Outreach**

Dear Mr. Brownell,

As you may be aware, North Seneca Solar, LLC (the Applicant) is in the process of developing the North Seneca Solar Project (hereafter, the Facility), a proposed solar energy generation facility of up to 105 megawatts (MW) consisting of rows of photovoltaic arrays and associated infrastructure located in the Towns of Junius and Waterloo in Seneca County, New York. This Facility is being reviewed by the New York State Office of Renewable Energy Siting (ORES) under Section 94-c of the New York State Executive Law (which establishes the permitting process for large-scale renewable energy projects) and the New York State Historic Preservation Office (NYSHPO) under Section 14.09 of the New York State Parks, Recreation, and Historic Preservation Law.

As required under Section 94-c, Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C. (EDR) is conducting historic resources surveys for review by the NYSHPO, which include the identification of historic resources (e.g., historic buildings, cemeteries, and bridges) that may be eligible for the State and National Registers of Historic Places (S/NRHP), as well as the evaluation of potential visual impacts to these resources.

The Section 94-c regulations also require consultation with local historic preservation groups and federal/state-recognized Indian Nations to identify potentially historic sites or structures within the Facility's study area. The study area consists of a one-mile radius surrounding the proposed Facility and includes portions of the Towns of Junius and Waterloo in Seneca County, and a very small portion of the Town of Phelps in Ontario County, New York (see Attachment A).

The following potentially historic resources have been identified within this study area in the NYSHPO's Cultural Resources Information System (CRIS) database:



NYSHPO Identification Number	Property Name and/or Description	Address	Municipality	S/NRHP Eligibility (NYSHPO Determined)
USN 09903.000013	A farmstead with a five-bay brick Greek Revival style residence	1329 Nine Foot Road	Town of Junius	S/NRHP-Eligible (NYSHPO Determined)
USN 09910.000132	A farmstead with a two-story brick Queen Anne style residence	1067 State Route 96	Town of Waterloo	S/NRHP Eligibility Undetermined
N/A	Bowdish Cemetery, a small nineteenth-century cemetery	West of 605 State Route 96	Town of Waterloo	S/NRHP Eligibility Undetermined
N/A	Quaker Cemetery, a nineteenth-century cemetery associated with a meetinghouse (not extant) with an estimated 180 burials, including at least one Revolutionary War veteran and several members of prominent Quaker activist families	North of 1999 Nine Foot Road	Town of Waterloo	S/NRHP Eligibility Undetermined
N/A	Hubbard Cemetery, a nineteenth-century cemetery with an estimated 80 burials	West of 932 Dunham Road	Town of Waterloo	S/NRHP Eligibility Undetermined

EDR is requesting your assistance in identifying any additional buildings, structures, or sites within the study area that may derive historic significance from their association with an historical event or person(s).

Please reach out via email at cstokes@edrdpc.com, or by phone at 315-471-0688 x688 if you have any questions and/or to discuss potential historic resources within the study area. Thank you for your time and attention.

Sincerely,

Kristen Olson
Historic Preservation Project Manager

Copies to: Walter J. Gable, Seneca County Historian; Sandra L. Ridley, Town of Waterloo Historian; and Cyndi Park-Sheils, Waterloo Library & Historical Society



July 31, 2023

Sandra L. Ridley
Town of Waterloo Historian

**RE: North Seneca Solar Project, Towns of Junius and Waterloo, Seneca County, New York
Historic Resources Survey Outreach**

Dear Ms. Ridley,

As you may be aware, North Seneca Solar, LLC (the Applicant) is in the process of developing the North Seneca Solar Project (hereafter, the Facility), a proposed solar energy generation facility of up to 105 megawatts (MW) consisting of rows of photovoltaic arrays and associated infrastructure located in the Towns of Junius and Waterloo in Seneca County, New York. This Facility is being reviewed by the New York State Office of Renewable Energy Siting (ORES) under Section 94-c of the New York State Executive Law (which establishes the permitting process for large-scale renewable energy projects) and the New York State Historic Preservation Office (NYSHPO) under Section 14.09 of the New York State Parks, Recreation, and Historic Preservation Law.

As required under Section 94-c, Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C. (EDR) is conducting historic resources surveys for review by the NYSHPO, which include the identification of historic resources (e.g., historic buildings, cemeteries, and bridges) that may be eligible for the State and National Registers of Historic Places (S/NRHP), as well as the evaluation of potential visual impacts to these resources.

The Section 94-c regulations also require consultation with local historic preservation groups and federal/state-recognized Indian Nations to identify potentially historic sites or structures within the Facility's study area. The study area consists of a one-mile radius surrounding the proposed Facility and includes portions of the Towns of Junius and Waterloo in Seneca County, and a very small portion of the Town of Phelps in Ontario County, New York (see Attachment A).

The following potentially historic resources have been identified within this study area in the NYSHPO's Cultural Resources Information System (CRIS) database:



NYSHPO Identification Number	Property Name and/or Description	Address	Municipality	S/NRHP Eligibility (NYSHPO Determined)
USN 09903.000013	A farmstead with a five-bay brick Greek Revival style residence	1329 Nine Foot Road	Town of Junius	S/NRHP-Eligible (NYSHPO Determined)
USN 09910.000132	A farmstead with a two-story brick Queen Anne style residence	1067 State Route 96	Town of Waterloo	S/NRHP Eligibility Undetermined
N/A	Bowdish Cemetery, a small nineteenth-century cemetery	West of 605 State Route 96	Town of Waterloo	S/NRHP Eligibility Undetermined
N/A	Quaker Cemetery, a nineteenth-century cemetery associated with a meetinghouse (not extant) with an estimated 180 burials, including at least one Revolutionary War veteran and several members of prominent Quaker activist families	North of 1999 Nine Foot Road	Town of Waterloo	S/NRHP Eligibility Undetermined
N/A	Hubbard Cemetery, a nineteenth-century cemetery with an estimated 80 burials	West of 932 Dunham Road	Town of Waterloo	S/NRHP Eligibility Undetermined

EDR is requesting your assistance in identifying any additional buildings, structures, or sites within the study area that may derive historic significance from their association with an historical event or person(s).

Please reach out via email at cstokes@edrdpc.com, or by phone at 315-471-0688 x688 if you have any questions and/or to discuss potential historic resources within the study area. Thank you for your time and attention.

Sincerely,

Kristen Olson
Historic Preservation Project Manager

Copies to: Walter J. Gable, Seneca County Historian; C. Ernest Brownell, Town of Junius Historian; and Cyndi Park-Sheils, Waterloo Library & Historical Society



July 31, 2023

Cyndi Park-Sheils
Waterloo Library & Historical Society

**RE: North Seneca Solar Project, Towns of Junius and Waterloo, Seneca County, New York
Historic Resources Survey Outreach**

Dear Ms. Park-Sheils,

As you may be aware, North Seneca Solar, LLC (the Applicant) is in the process of developing the North Seneca Solar Project (hereafter, the Facility), a proposed solar energy generation facility of up to 105 megawatts (MW) consisting of rows of photovoltaic arrays and associated infrastructure located in the Towns of Junius and Waterloo in Seneca County, New York. This Facility is being reviewed by the New York State Office of Renewable Energy Siting (ORES) under Section 94-c of the New York State Executive Law (which establishes the permitting process for large-scale renewable energy projects) and the New York State Historic Preservation Office (NYSHPO) under Section 14.09 of the New York State Parks, Recreation, and Historic Preservation Law.

As required under Section 94-c, Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C. (EDR) is conducting historic resources surveys for review by the NYSHPO, which include the identification of historic resources (e.g., historic buildings, cemeteries, and bridges) that may be eligible for the State and National Registers of Historic Places (S/NRHP), as well as the evaluation of potential visual impacts to these resources.

The Section 94-c regulations also require consultation with local historic preservation groups and federal/state-recognized Indian Nations to identify potentially historic sites or structures within the Facility's study area. The study area consists of a one-mile radius surrounding the proposed Facility and includes portions of the Towns of Junius and Waterloo in Seneca County, and a very small portion of the Town of Phelps in Ontario County, New York (see Attachment A).

The following potentially historic resources have been identified within this study area in the NYSHPO's Cultural Resources Information System (CRIS) database:



NYSHPO Identification Number	Property Name and/or Description	Address	Municipality	S/NRHP Eligibility (NYSHPO Determined)
USN 09903.000013	A farmstead with a five-bay brick Greek Revival style residence	1329 Nine Foot Road	Town of Junius	S/NRHP-Eligible (NYSHPO Determined)
USN 09910.000132	A farmstead with a two-story brick Queen Anne style residence	1067 State Route 96	Town of Waterloo	S/NRHP Eligibility Undetermined
N/A	Bowdish Cemetery, a small nineteenth-century cemetery	West of 605 State Route 96	Town of Waterloo	S/NRHP Eligibility Undetermined
N/A	Quaker Cemetery, a nineteenth-century cemetery associated with a meetinghouse (not extant) with an estimated 180 burials, including at least one Revolutionary War veteran and several members of prominent Quaker activist families	North of 1999 Nine Foot Road	Town of Waterloo	S/NRHP Eligibility Undetermined
N/A	Hubbard Cemetery, a nineteenth-century cemetery with an estimated 80 burials	West of 932 Dunham Road	Town of Waterloo	S/NRHP Eligibility Undetermined

EDR is requesting your assistance in identifying any additional buildings, structures, or sites within the study area that may derive historic significance from their association with an historical event or person(s).

Please reach out via email at cstokes@edrdpc.com, or by phone at 315-471-0688 x688 if you have any questions and/or to discuss potential historic resources within the study area. Thank you for your time and attention.

Sincerely,

Kristen Olson
Historic Preservation Project Manager

Copies to: Walter J. Gable, Seneca County Historian; C. Ernest Brownell, Town of Junius Historian; and Sandra L. Ridley, Town of Waterloo Historian

From: [New York State Parks CRIS Application](#)
To: [Doug Pippin](#)
Cc: [Grant Johnson](#); [William Whipps](#); [Matthew Weiss](#); [Laurie Reynolds](#); [ifunk@savionenergy.com](#); [Kristy.Primeau@ores.ny.gov](#); [Andrea Zlotucha Kozub](#); [Jennifer.Betsworth@ores.ny.gov](#); [Kristen Olson](#)
Subject: NY SHPO: Requested Submission 54FPQ8MQLFEF Accepted for Consultation Project 22PR05554
Date: Friday, August 25, 2023 1:55:11 PM

[EXTERNAL SENDER]

Requested Submission Accepted

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

Requested Submission Token: 54FPQ8MQLFEF

New Submission Number: 22PR05554.005

Project Number: 22PR05554

Project Type: Consultation

Project Name: North Seneca Solar Project/105 MW/1909 Acres

Consolidated Response Token: KEFAEJ2ANL21

Previous Submission Number: 22PR05554.001

Closed Request: For solar arrays covering more than 200-acres, establish a project Zone of Visual Impact (“ZVI”) through a GIS analysis of areas that will have positive visibility of the solar field based upon topography only (do not factor in vegetation). Survey all properties (buildings, structures, sites, historic districts) 50-years old or older within 1-mile of the solar array ZVI. Survey should be completed by a 36 CFR 61 qualified consultant as the surveyor needs to be 36 CFR 61 qualified to make determinations of National Register eligibility. Surveyor will submit the proposed ZVI and Methodology/Survey Work Plan to CRIS prior to undertaking any survey field work. Survey will include all properties within the ZVI that were previously determined eligible for inclusion in or are already listed in the New York State and National Registers of Historic Places using the Division’s Cultural Resource Information System (CRIS). Documentation must include, at a minimum, clear digital images taken from ground level and showing the front and sides of the main building and any associated outbuildings; address and map location; and date of construction (if known), and eligibility (if known). For questions about this survey request, contact virginia.bartos@parks.ny.gov.

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

New York State Historic Preservation Office

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

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

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

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

Who sent this email?

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

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

Why did I receive this email?

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

What do I need to do?

You do not need to take any action at this time. The requested submission is now under SHPO review as project submission 22PR05554.005.

What will happen next?

SHPO will review the submission. If SHPO sends comments or questions in response to this submission, the project contacts will receive an email notification with a link to SHPO's correspondence.

What else can I do?

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

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

Where can I get help?

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

If you still have questions about CRIS, please contact CRIS Help at CRISHelp@parks.ny.gov.

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

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

Review Responses

Reviewer	Review Type	Response
Virginia Bartos	Survey and Evaluation	In order for SHPO to complete our evaluation of the historic significance of all buildings/structures /districts within or adjacent to your project area, we need further information. Please review the specific information request(s) below and click the Process button to respond to each request.

Information Requests

Process	Status	Reviewer	Review Type	Request Type	Request Entity	Request Item	Request Description
	Information Requested	Virginia Bartos	Survey and Evaluation	Request a New Trekker Survey			Methodology has been accepted. After methodology approval by SHPO, you will be granted access to specific field inventory forms via the Survey123 app, as well as Trekker Manager. This survey request is for buildings and structures 50 years of age or older, as well as previously identified CRIS resources that are eligible or listed. A separate CRIS request for the survey report will also be sent at this time to be fulfilled once field work has been completed. Please supply the standard survey report consisting of an overview, context and an assessment of any resources that may be eligible. Contact Chelsea Towers at chelsea.towers@park with any questions. Thank you.



October 12, 2023

**Municipal Planning, State Agency, and Party List Representatives
Per Attached Distribution List**

RE: North Seneca Solar Project (ORES Matter No. Pending), Towns of Junius and Waterloo, Seneca County, New York
Official Request for Stakeholder Input on Visually Sensitive Resources and Representative Viewpoints

Dear Municipal Planning, State Agency, or Party List Representative:

As you may be aware, North Seneca Solar Project, LLC (the Applicant) is proposing to construct and operate the North Seneca Solar Project (the Project), an up to 90-megawatt (MW) alternating current (AC) solar energy generation facility in the Towns of Junius and Waterloo, Seneca County, New York (hereafter referred to as the Facility; see Attachment A, Figure 1). The proposed Facility is subject to review under Chapter XVIII, Title 19 of New York Codes, Rules, and Regulations (NYCRR) Part 900, §900-2.9 and Section 94-c of the New York State Executive Law (hereafter referred to as Section 94-c). In accordance with Section 94-c regulations, Exhibit 8, Visual Impacts, *"the applicant shall confer with municipal planning representatives, the Office, and where appropriate, OPRHP and/or APA in its selection of important or representative viewpoints."*

Pursuant to Section 94-c requirements, Environmental Design and Research, Landscape Architecture, Engineering and Environmental Services, D.P.C. (EDR) is reaching out to representatives from state agencies and each jurisdiction in the Visual Study Area on behalf of the Applicant to request your assistance in identifying visually sensitive resources, existing and proposed sensitive land-uses, and potential photosimulation locations in the vicinity of the proposed Facility (see Attachment B for a list of all representatives included in this correspondence). This information will help inform the content of a Visual Impact Assessment (VIA) that is being prepared to assess the potential visual effects resulting from the Facility. The information presented in this letter and its attachments are intended to provide you with enough context and information to assist in the identification of visually sensitive resources and candidate photosimulation locations.

List of Attachments

Attachment A: Figures

Figure 1: Visual Study Area and Facility Site

Figure 2: Visual Sensitive Resources and Viewshed

Figure 3: Landscape Similarity Zones

Attachment B: Distribution List

Attachment C: Visually Sensitive Resources Table

Attachment D: Viewpoint Photolog

Definitions of Specific Terms and Acronyms Used in this Letter

Visual Impact Assessment (VIA) is a study evaluating the potential visibility, appearance, and visual impact associated with a proposed project.

Visual Study Area (VSA) is defined as the area within a 2-mile radius of Facility components in accordance with 94-c regulations. The VSA boundary for the Facility is shown on Attachment A, Figure 1.

Viewshed Analysis was performed to identify locations within the VSA where there is potential for the proposed photovoltaic (PV) panels to be seen from ground-level vantage points. This analysis considers the height and location of all surface features, including ground surface topography, existing structures, and existing vegetation. The results of the viewshed analysis are shown in Attachment A, Figure 2.

Distance Zones are defined in visual studies to divide a study area into distance sub-areas based on the various levels of landscape and Facility detail available to the viewers. EDR has defined four preliminary distance zones within the visual study area (as measured from the perimeter of the current PV panels and interconnection facility locations): Near-Foreground (0-300 feet), Foreground (300 feet- 0.5 mile), Middle Ground (0.5 – 4.0 miles), Background (4.0+ miles). Mapped locations of the distance zones are shown in Attachment A, Figure 1.

Landscape Similarity Zones (LSZs) are subsets of the VSA that are defined based on the similarity of various landscape characteristics including topography, vegetation, water, and land use patterns, in accordance with established visual assessment methods. EDR has defined six preliminary LSZs within the visual study area: forest, agriculture/rural residential, commercial, open water, transportation and village. Mapped locations of the LSZs are shown in Attachment A, Figure 3, and a brief description of each LSZ is provided below.

Photosimulations are images of a realistic three dimensional (3D) model of the proposed Facility superimposed on photographs of the existing landscape. The photosimulations accurately illustrate how the proposed Facility would appear upon completion and are used to evaluate the visual contrast of the proposed Facility with the existing visual environment.

Visually Sensitive Resources

Visually Sensitive Resources (VSRs) were identified within the 2-mile VSA in accordance with guidance provided by New York State Department of Environmental Conservation (NYSDEC) Program Policy DEP-00-2 *Assessing and Mitigating Visual and Aesthetic Impacts* (NYSDEC, 2019) and the requirements of Section 94-c. In addition, EDR identified other resources that could be considered visually sensitive based on the type or intensity of use they receive. The category of VSRs identified for this VIA include the following:

- **Properties of Historic Significance** (*National/State Historic Landmarks, Properties/Districts Listed on the National or State Register of Historic Places, Properties Eligible for listing on the National or State Register of Historic Places*)
- **Designated Scenic Resources** (*Rivers Designated as National or State Wild, Scenic or Recreational, Adirondack Park Scenic Vistas, Sites, Areas, Lakes, Reservoirs or Highways Designated or Eligible for Designation as Scenic, Scenic Areas of Statewide Significance, Other Designated Scenic Resources (Easements, Roads, Districts, and Overlooks).*)
- **Public Lands and Recreational Resources** (*National Parks, Recreation Areas, Seashores, and Forests, National Natural Landmarks, National Wildlife Refugees, Heritage Areas, State Parks, State Nature and Historic Preserve Areas, State Forest Preserve, Other State Lands; Wildlife Management Areas and Game Refugees, State Forests, State Fishing/Waterway Access Sites, Trails, State and Federal Trails, Snowmobile/ATV Trails, Bike Trails/Routes, Palisades Park, Local Parks and Recreational Areas, Publicly Accessible Conservation Lands/Easements, Rivers and Streams with Public Fishing Rights Easements, Named Lakes, Ponds and Reservoirs*)
- **High-Use Public Areas** (*US, State and Interstate Highways, Schools, Cities, Villages, Hamlets*)
- **Native American Lands**

Please note that the architectural survey that identifies properties eligible for listing in the National or State Register of Historic Places is ongoing. Therefore, these resources have not been identified at this time. Once the architectural survey is completed, any resources identified as eligible for listing on the National or State Register of Historic Places will be added to the VSR inventory.

Attachment A, Figure 2 illustrates the location of each identified resource and Attachment C provides information about each resource, including its name, distance zone, and the potential visibility of the PV panels based on a preliminary viewshed analysis.

Landscape Similarity Zones

Six discrete LSZs within the VSA were defined based on the similarity of various landscape characteristics, including landform, vegetation, water, and land use patterns. The LSZs are illustrated in Attachment A Figure 3 and a brief description of each LSZ is provided below. The LSZs will be described in greater detail in the VIA.

- **Forest LSZ** is characterized by large, contiguous areas of mixed deciduous and coniferous tree species. Typical views within this LSZ are short range and include substantial foreground screening. Where open views are available, they are often tightly enclosed by trees and other vegetation, such as views along roadway corridors or in small clearings. Views from the edge of the Forest LSZ can be more open, particularly during leaf-off conditions and when adjacent to agricultural land.
- **Agricultural/Rural Residential LSZ** is characterized by open agricultural land mixed with farm complexes, small woodlots, and low-density residential development that is dissected by a network of local roads and state routes. Views available in this LSZ typically feature a relatively level and open foreground of agricultural fields with scattered homes and agricultural structures that are

backed or bordered by forested areas. In some conditions, such as before harvest, views may be very short-range due to screening provided by roadside crops.

- **Village LSZ** is characterized by moderate to high-density residential and commercial development. Buildings and structures are arranged along an organized street pattern that tends to screen outward views and focus views along the main streets. Views within this LSZ are generally short-range and feature commercial buildings or residences and associated yard vegetation backed by trees and other vegetation. However, the edges of the Village LSZ (where there is typically less dense development) and large, open areas (such as sports fields) offer the opportunity for more open, unobstructed views of the surrounding landscape.
- **Commercial LSZ** consists of the Waterloo Premium Outlet Mall, which is characterized by one to three story commercial shops in separate buildings that are arranged along the perimeter of a large parking area. Views within this LSZ are generally short-range and feature paved, parking areas interspersed with planted islands in the foreground backed by retail buildings.
- **Open Water LSZ** consists of broad expanses of water that provide open views of the surrounding landscape. Within the VSA, this LSZ includes prominent lakes and ponds, such as Burnett and Junius Ponds, and the Seneca River. Outward views from boats on the river or pond surface and from points along the shore typically feature open water in the foreground backed by trees and man-made structures.
- **Transportation LSZ** consists of the Interstate 90 corridor, which is characterized as a divided-multi-lane highway with limited access. Typical views are dominated by pavement and moving vehicles in the immediate foreground backed by a mix of forest and agricultural land and low density rural residential houses.

Field Review

EDR personnel conducted field review within the VSA on March 22, 2023, and September 15, 2023. During field review, EDR staff members traveled public roads and visited public vantage points throughout the VSA to confirm the results of the viewshed analysis and obtain photographs to document existing views/visual character for subsequent development of photosimulations. Field review resulted in documentation of 39 representative viewpoints. Photographs for each viewpoint, including a panorama composition illustrating the view context and a single-frame photograph illustrating the most open, unobstructed view available towards the Facility Site, are included within Attachment D (Viewpoint Photolog). The viewpoint locations are illustrated in Attachment A, Figure 1.

Feedback Requests

Visually Sensitive Resources

EDR and the Applicant are formally requesting feedback from you to identify additional VSRs.

Please review the mapped locations of VSRs identified to date in Attachment A, Figure 2 and listed in Attachment C. The Applicant believes the list of the VSRs included herein represents a substantially

complete inventory of the VSRs within the VSA. Please let us know whether there are any additional sites/locations that are visually sensitive and that you believe should be added to the inventory and subsequently evaluated in the VIA. If so, please provide the name, location, and a brief description for each resource.

Proposed Land Use

EDR and the Applicant are requesting feedback from you in the identification of any proposed land uses that may be sensitive to visual impact.

Pursuant to Section 94-c requirements, “proposed land uses” are required to be considered as part of the viewpoint selection process. Publicly available zoning codes, comprehensive plans, and local laws for each town within the VSA will be reviewed to identify current and future land uses within the VSA. However, the Applicant anticipates instances in which a municipality is in process of completing updates to existing zoning codes, comprehensive plans, or local laws. In addition, it is recognized that projects/developments may be pending or currently under review by town boards, planning boards, or the zoning board of appeals. Please provide information outlining amendments to local codes or laws and/or information regarding proposed projects and/or land uses that should be considered in the VIA.

Photosimulation Locations

EDR and the Applicant are requesting feedback from you in the selection of viewpoints for the production of photosimulations.

As mentioned previously, a full viewpoint photolog including a representative photograph from each of the visited sites can be found in Attachment D, and viewpoint locations are illustrated in Attachment A, Figure 1. The Applicant anticipates preparing representative photosimulations to illustrate the appearance of the proposed Facility from various distances within a range of visual settings. The Applicant is considering the following nine viewpoints for the production of photosimulations:

Viewpoint	Location, Coordinates	Municipality	Reason for Recommendation
5	State Route 318 42.95443, -76.89603	Town of Junius	Representative of one of the few relatively open, unobstructed views that are anticipated to be available from the middle ground distance zone. This viewpoint is from one of the major roads in the VSA and therefore is expected to have a high degree of viewer exposure.
7	Mill Road 42.94473, -76.88693	Town of Junius	Representative view from the foreground distance zone and Agricultural/Rural Residential LSZ. It is anticipated that Facility visibility will be concentrated to this distance zone and LSZ.
10	Mill Road 42.92403, -76.88519	Town of Waterloo	Representative view from the foreground distance zone and Agricultural/Rural Residential LSZ. This viewpoint is from an area with a relatively high density of residential development within this LSZ.

Viewpoint	Location, Coordinates	Municipality	Reason for Recommendation
13	State Route 96 42.92334, -76.89658	Town of Waterloo	Representative view from the foreground distance zone and Agricultural/Rural Residential LSZ. This viewpoint is from one of the major roads in the VSA and is expected to have a high degree of viewer exposure.
15	State Route 95 and Hidden Spring Lane 42.92874, -76.92889	Town of Waterloo	Representative view from the foreground distance zone and Agricultural/Rural Residential LSZ. This viewpoint is from one of the major roads in the VSA and is expected to have a high degree of viewer exposure.
25	Ninefoot Road 42.94215, -76.92339	Town of Waterloo	Representative of the most open, unobstructed views of anticipated to be available of the proposed substations.
26	Ninefoot Road 42.94606, -76.92374	Town of Junius	Representative view from the foreground distance zone and Agricultural/Rural Residential LSZ. It is anticipated that Facility visibility will be concentrated to this distance zone and LSZ.
35	Whiskey Hill Road and Dunham Road 42.93956, -76.90174	Town of Waterloo	Representative view from the foreground distance zone and Agricultural/Rural Residential LSZ. It is anticipated that Facility visibility will be concentrated to this distance zone and LSZ.
36A	Whiskey Hill Road 42.93776, -76.90161	Town of Waterloo	Representative of views from the near-foreground distance zone and Agricultural/Rural Residential LSZ.

Please review the recommended viewpoints and provide feedback regarding whether these viewpoints are appropriate, or if there are any additional locations that you would like to be considered as candidate viewpoints for photosimulation development.

In order to provide sufficient time to incorporate your feedback into the Visual Impact Assessment, we request that any responses by November 10, 2023.

October 12, 2023

All future correspondence regarding the VIA for the Facility will be by email, unless otherwise specified. Please confirm your email address from the distribution list or, if missing, please provide your email address in your response to this letter. Please direct any future correspondence specific to the visual assessment, visual resources, and photosimulations, including responses to this request, to the contact below. If you would like to meet to discuss the information presented in this letter, please send a request to the contact below. Please note email responses in excess of 15 megabytes will not be received. If you do not receive confirmation of email receipt, please call 315.471.0688 extension 684 and leave a voicemail for Jessey Horvat.

- Via email to: jhorvat@edrdpc.com
- Via written letter to:
Attn: Jessey Horvat
Environmental Design & Research
Suite 700
217 Montgomery Street
Syracuse, NY 13202

Thank you in advance for your participation in this process.

Sincerely,



Jessey Horvat

Visualization Project Manager

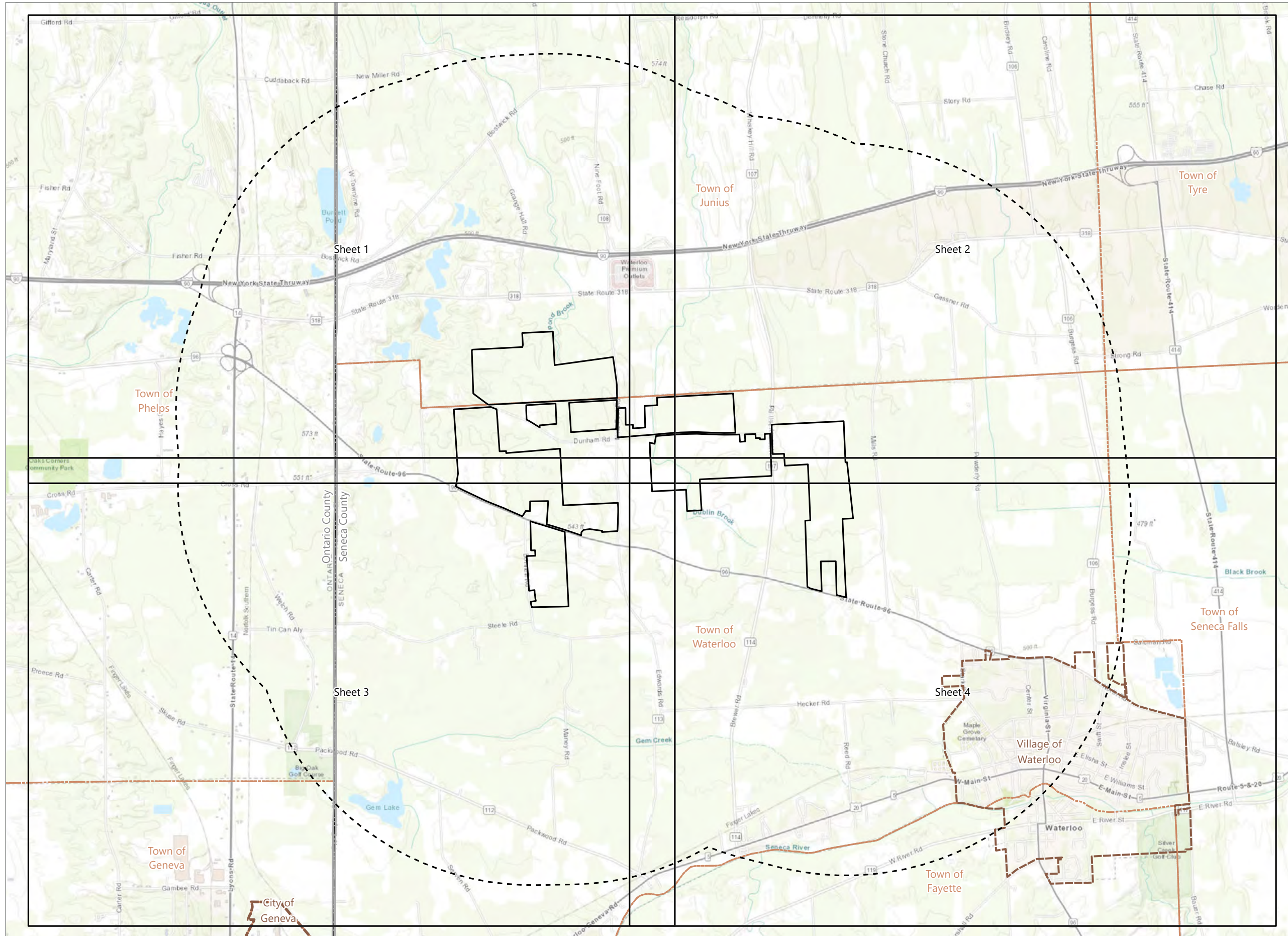
Attachment A: Figures

North Seneca Solar Project

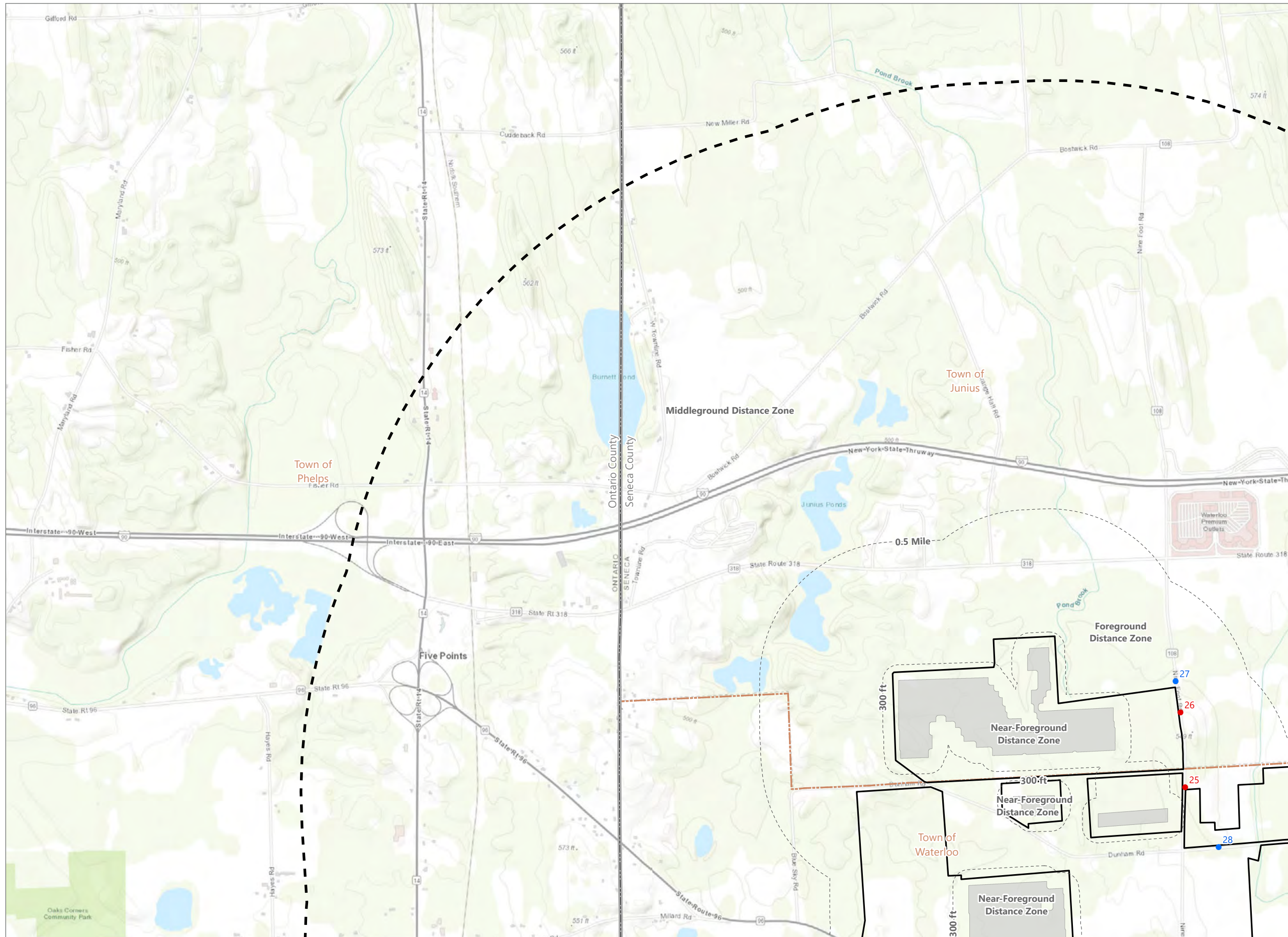
Towns of Waterloo and Junius
Seneca County, New York

Visual Impact Assessment Public Outreach Letter

-  2-Mile Visual Study Area
-  Facility Site



Prepared October 4, 2023
 Basemap: Esri "World Topographic Map" map service

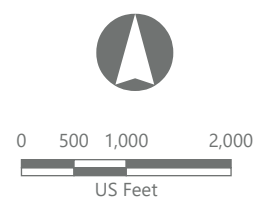
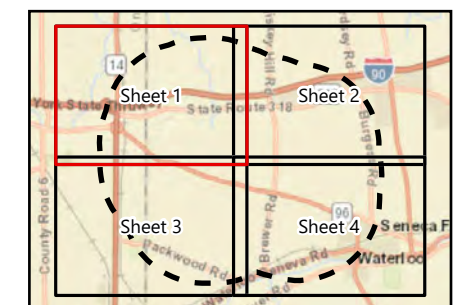


North Seneca Solar Project

Towns of Waterloo and Junius
Seneca County, New York

Visual Impact Assessment Public Outreach Letter

- Viewpoint Location
- Recommended Viewpoint
 - Viewpoint Location
 - 2-Mile Visual Study Area
 - - - Distance Zone
 - ▭ Facility Site
 - ▭ PV Array



Prepared October 12, 2023
Basemap: Esri "World Topographic Map" map service

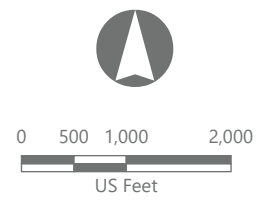
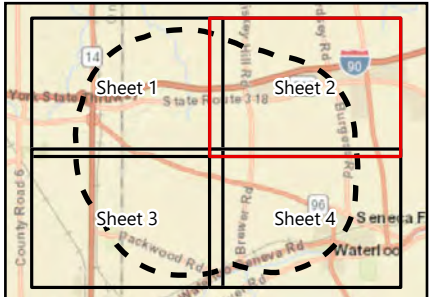
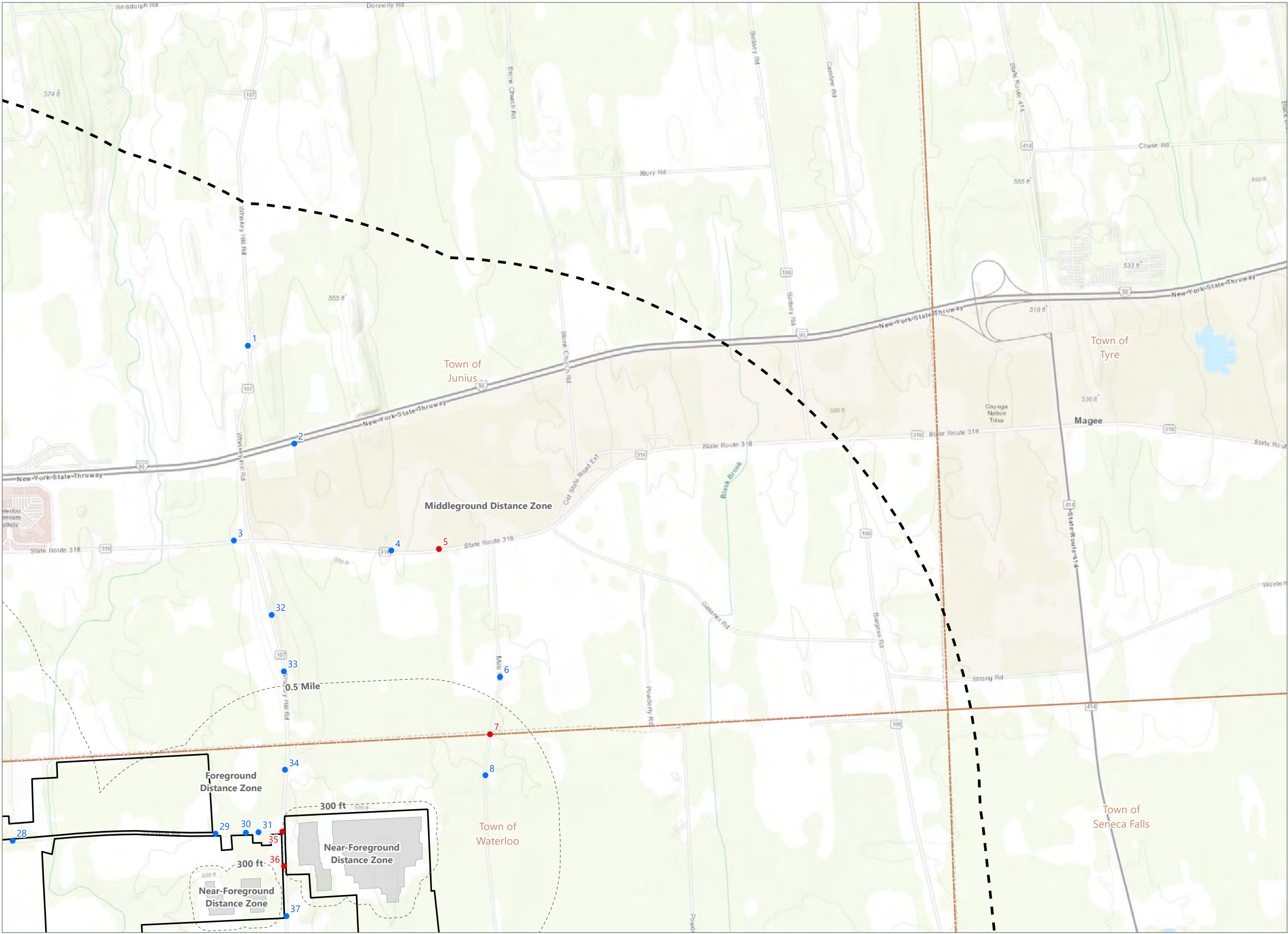
Figure 1. Visual Study Area and Facility Site

North Seneca Solar Project

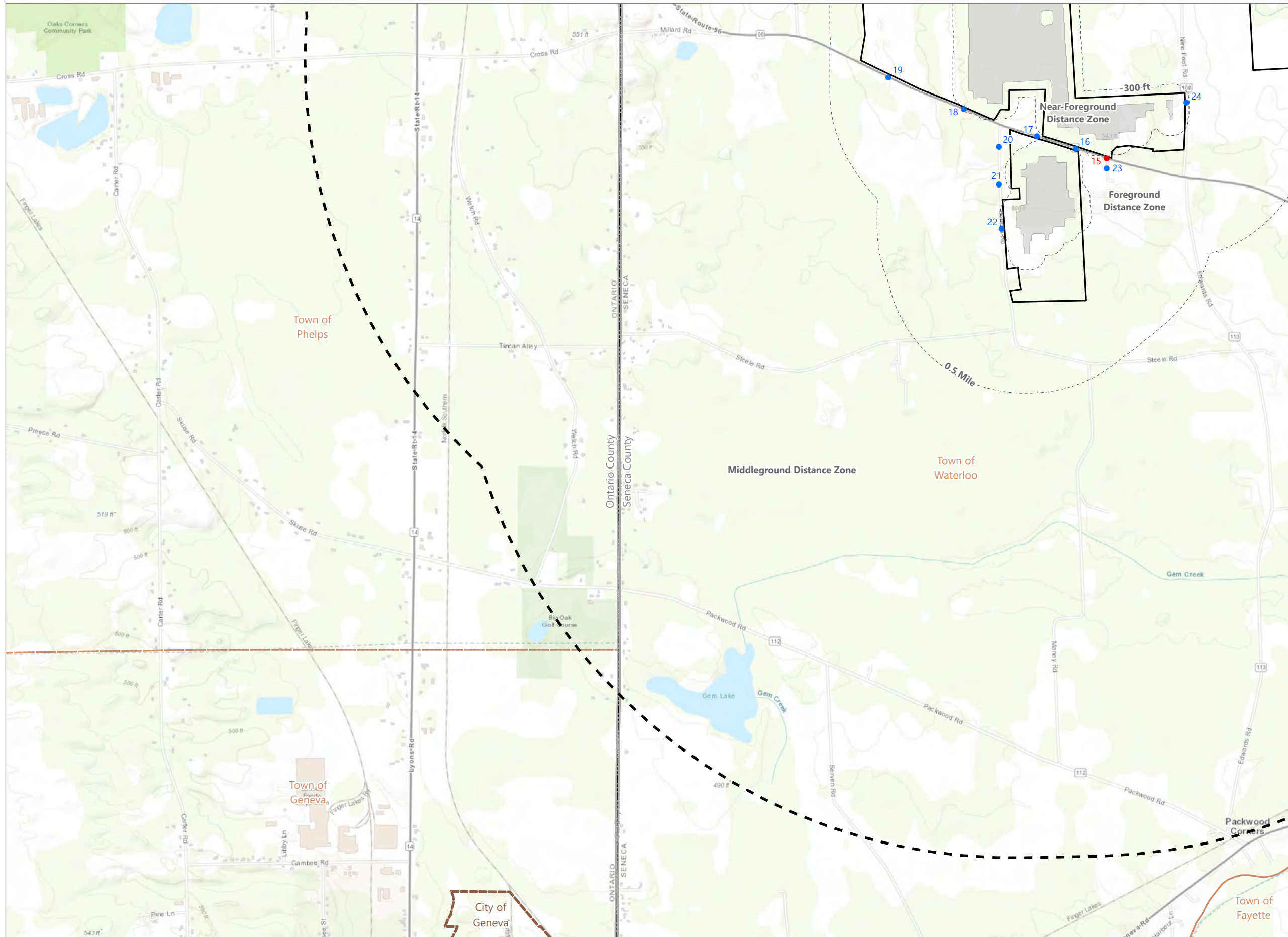
Towns of Waterloo and Junius
Seneca County, New York

Visual Impact Assessment Public Outreach Letter

- Viewpoint Location
 - Recommended Viewpoint
 - Viewpoint Location
- 2-Mile Visual Study Area
- Distance Zone
- Facility Site
- PV Array



Prepared October 12, 2023
Basemap: Esri "World Topographic Map" map service

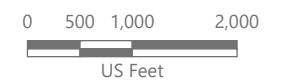
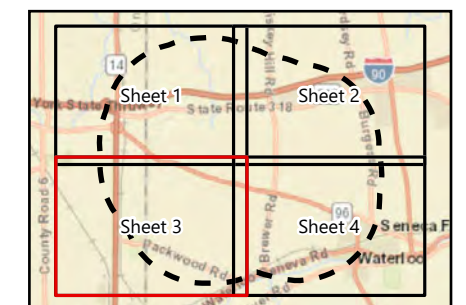


North Seneca Solar Project

Towns of Waterloo and Junius
Seneca County, New York

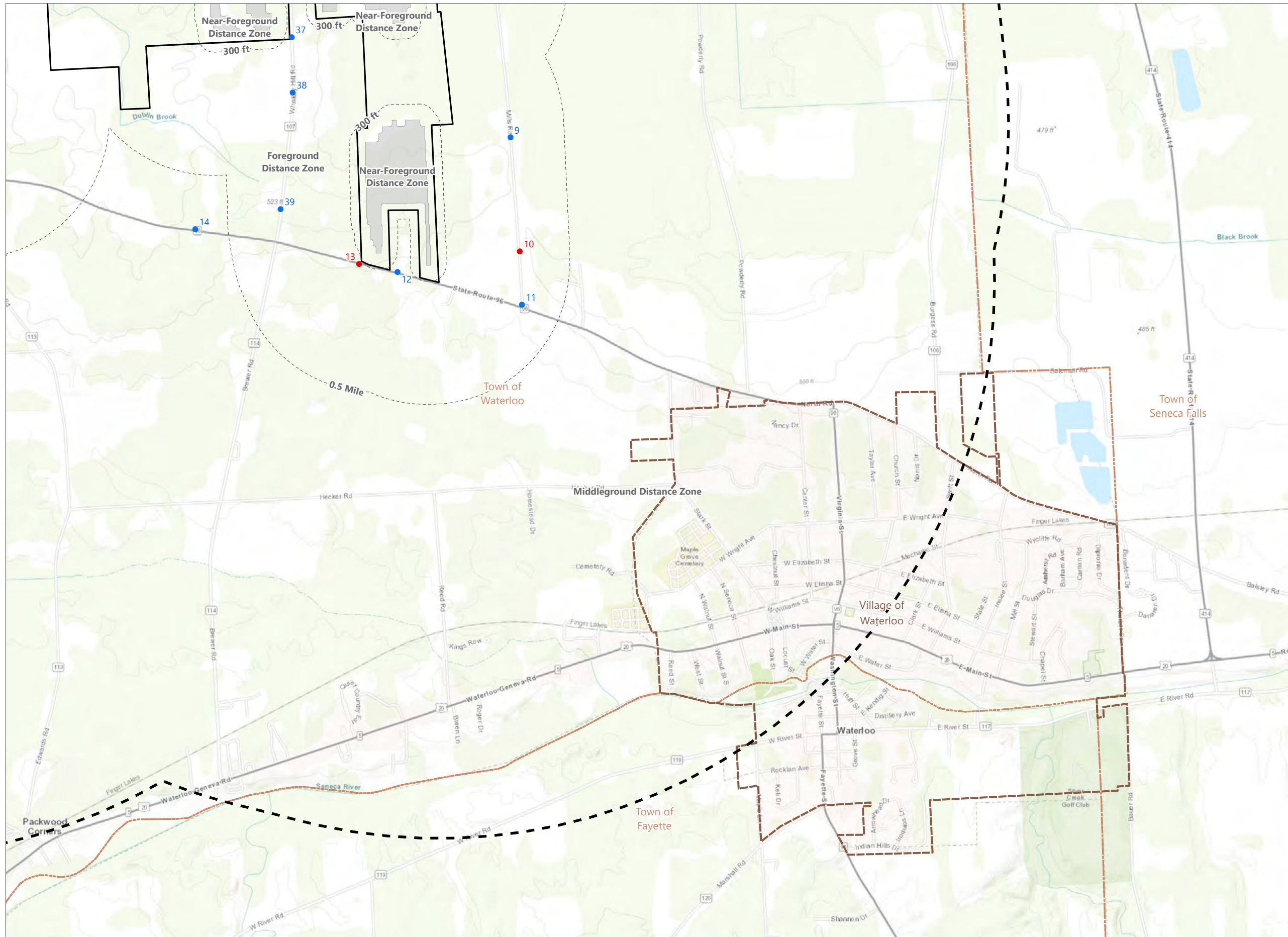
Visual Impact Assessment Public Outreach Letter

- Viewpoint Location
- Recommended Viewpoint
 - Viewpoint Location
 - 2-Mile Visual Study Area
 - Distance Zone
 - Facility Site
 - PV Array



Prepared October 12, 2023
Basemap: Esri "World Topographic Map" map service

Figure 1. Visual Study Area and Facility Site

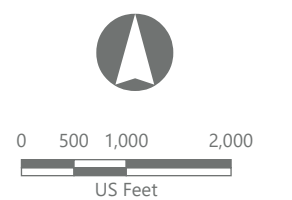
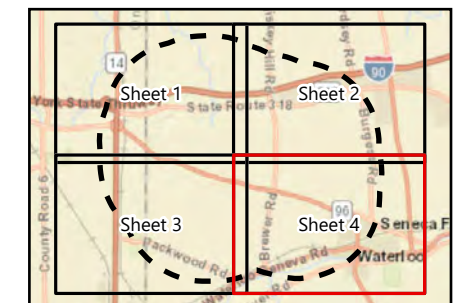


North Seneca Solar Project

Towns of Waterloo and Junius
Seneca County, New York

Visual Impact Assessment Public Outreach Letter

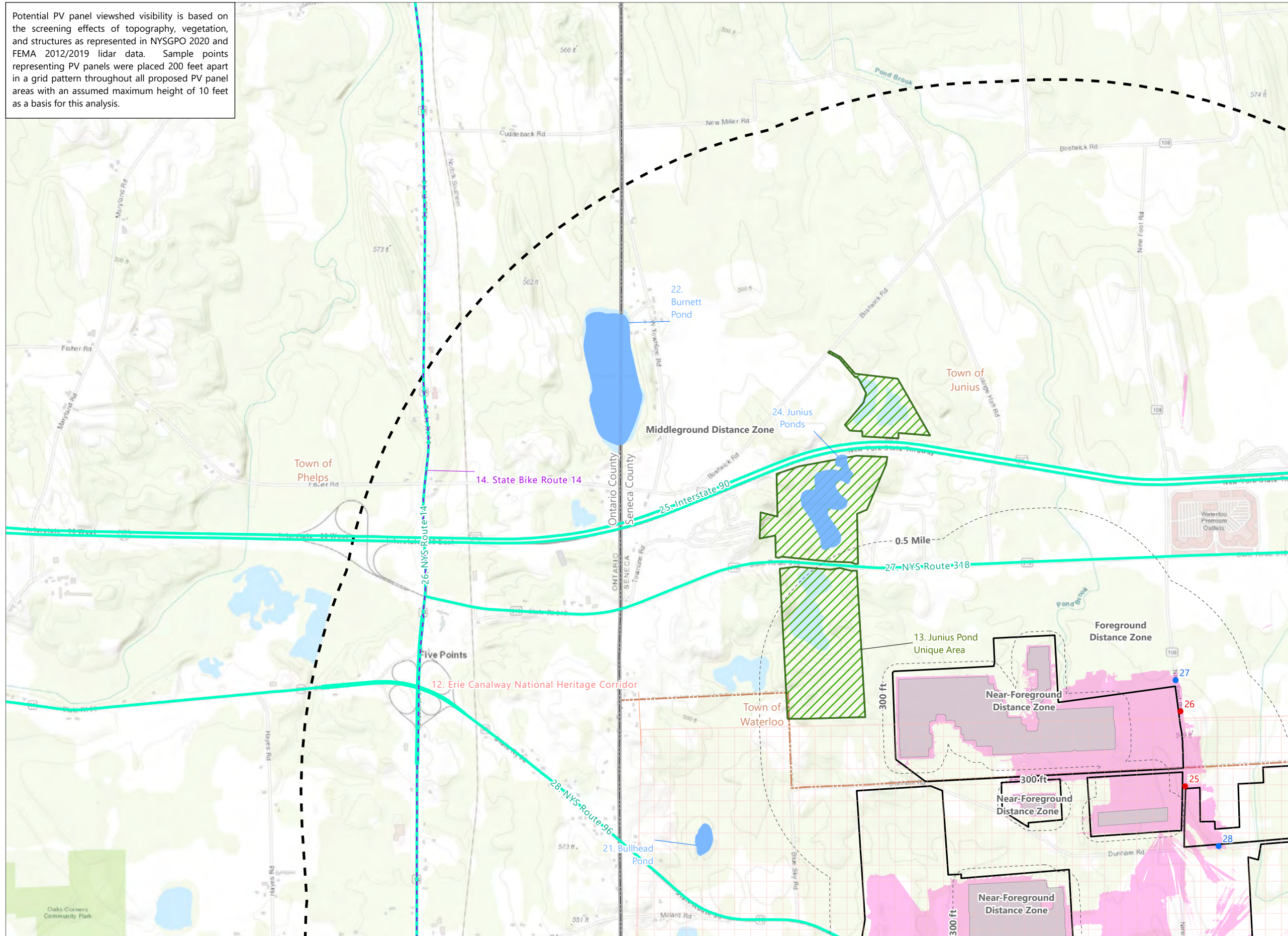
- Viewpoint Location
- Recommended Viewpoint
 - Viewpoint Location
 - 2-Mile Visual Study Area
 - - - Distance Zone
 - ▭ Facility Site
 - ▭ PV Array



Prepared October 12, 2023
Basemap: Esri "World Topographic Map" map service

Figure 2. Visually Sensitive Resources and Viewshed Results

Potential PV panel viewshed visibility is based on the screening effects of topography, vegetation, and structures as represented in NYSGPO 2020 and FEMA 2012/2019 lidar data. Sample points representing PV panels were placed 200 feet apart in a grid pattern throughout all proposed PV panel areas with an assumed maximum height of 10 feet as a basis for this analysis.



North Seneca Solar Project

Towns of Waterloo and Junius
Seneca County, New York

**Visual Impact Assessment
Public Outreach Letter**

Viewpoint Location

- Recommended Viewpoint
- Viewpoint Location

--- 2-Mile Visual Study Area

--- Distance Zone

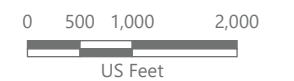
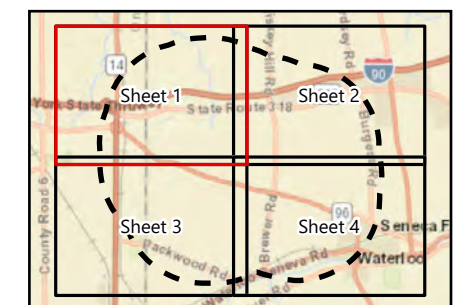
□ Facility Site

■ PV Array

■ PV Panel DSM Viewshed Visibility

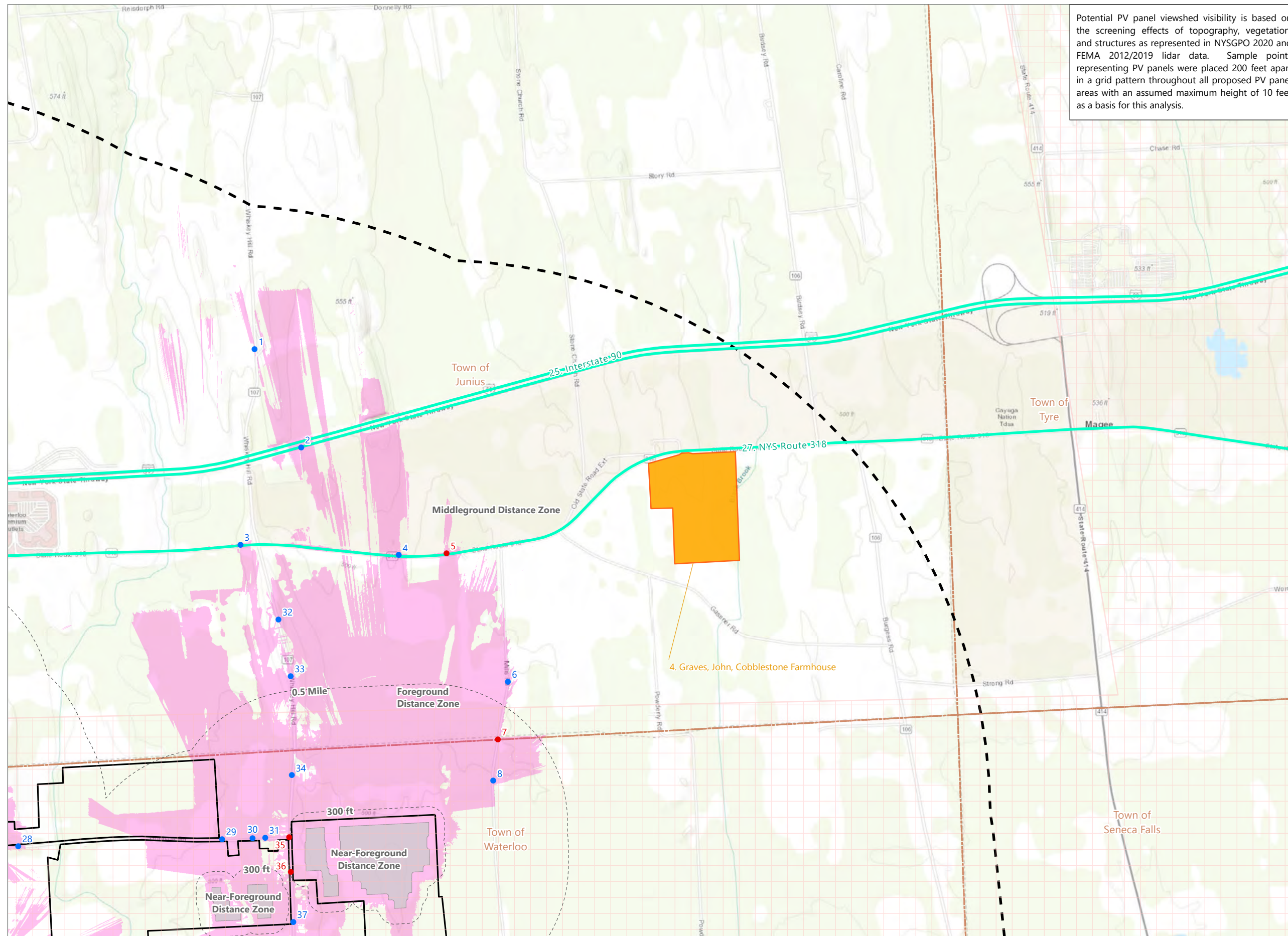
Visually Sensitive Resources

- Bike Trail Route
- State/US/Interstate Highway
- Heritage Area
- Named Lake Pond and Reservoir
- Other State Land



Prepared October 12, 2023
Basemap: Esri "World Topographic Map" map service

Figure 2. Visually Sensitive Resources and Viewshed Results



Potential PV panel viewshed visibility is based on the screening effects of topography, vegetation, and structures as represented in NYSGPO 2020 and FEMA 2012/2019 lidar data. Sample points representing PV panels were placed 200 feet apart in a grid pattern throughout all proposed PV panel areas with an assumed maximum height of 10 feet as a basis for this analysis.

North Seneca Solar Project

Towns of Waterloo and Junius
Seneca County, New York

Visual Impact Assessment Public Outreach Letter

Viewpoint Location

- Recommended Viewpoint
- Viewpoint Location

2-Mile Visual Study Area

Distance Zone

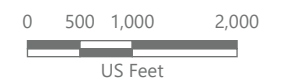
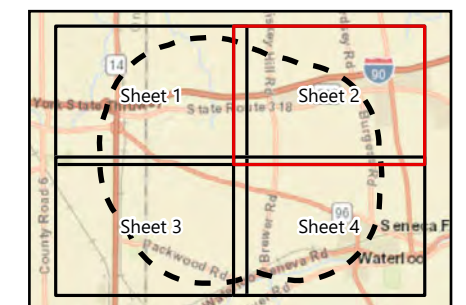
Facility Site

PV Array

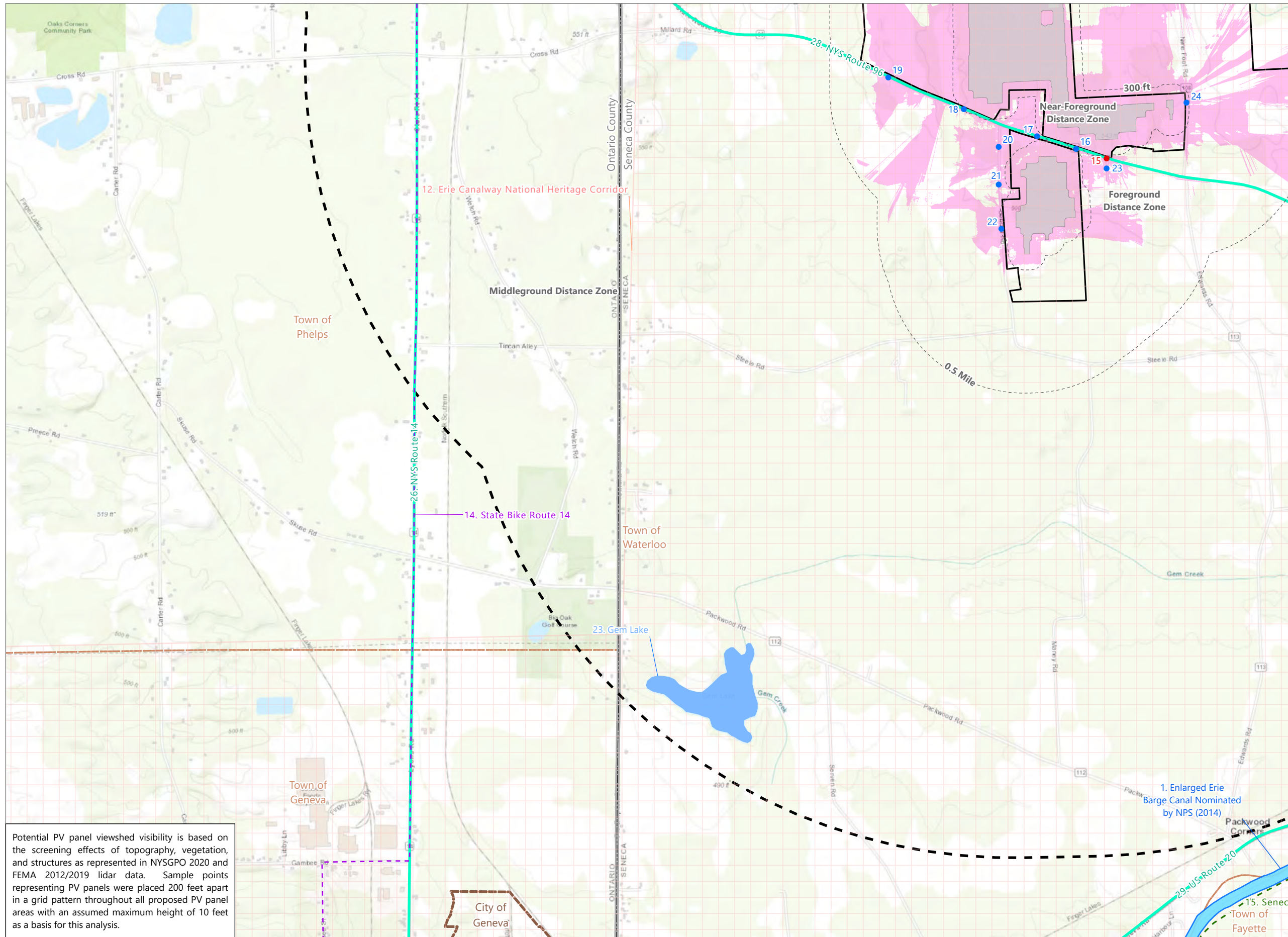
PV Panel DSM Viewshed Visibility

Visually Sensitive Resources

- State/US/Interstate Highway
- Heritage Area
- NRHP-Listed Resource



Prepared October 12, 2023
Basemap: Esri "World Topographic Map" map service



Potential PV panel viewshed visibility is based on the screening effects of topography, vegetation, and structures as represented in NYSGPO 2020 and FEMA 2012/2019 lidar data. Sample points representing PV panels were placed 200 feet apart in a grid pattern throughout all proposed PV panel areas with an assumed maximum height of 10 feet as a basis for this analysis.

North Seneca Solar Project

Towns of Waterloo and Junius
Seneca County, New York

Visual Impact Assessment Public Outreach Letter

Viewpoint Location

- Recommended Viewpoint
- Viewpoint Location

2-Mile Visual Study Area

Distance Zone

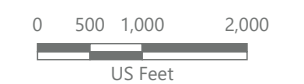
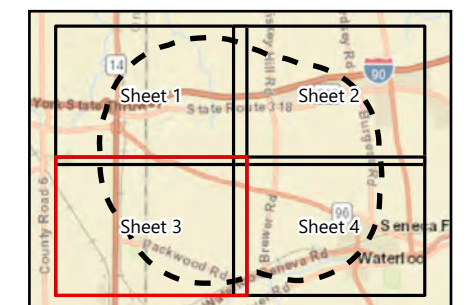
Facility Site

PV Array

PV Panel DSM Viewshed Visibility

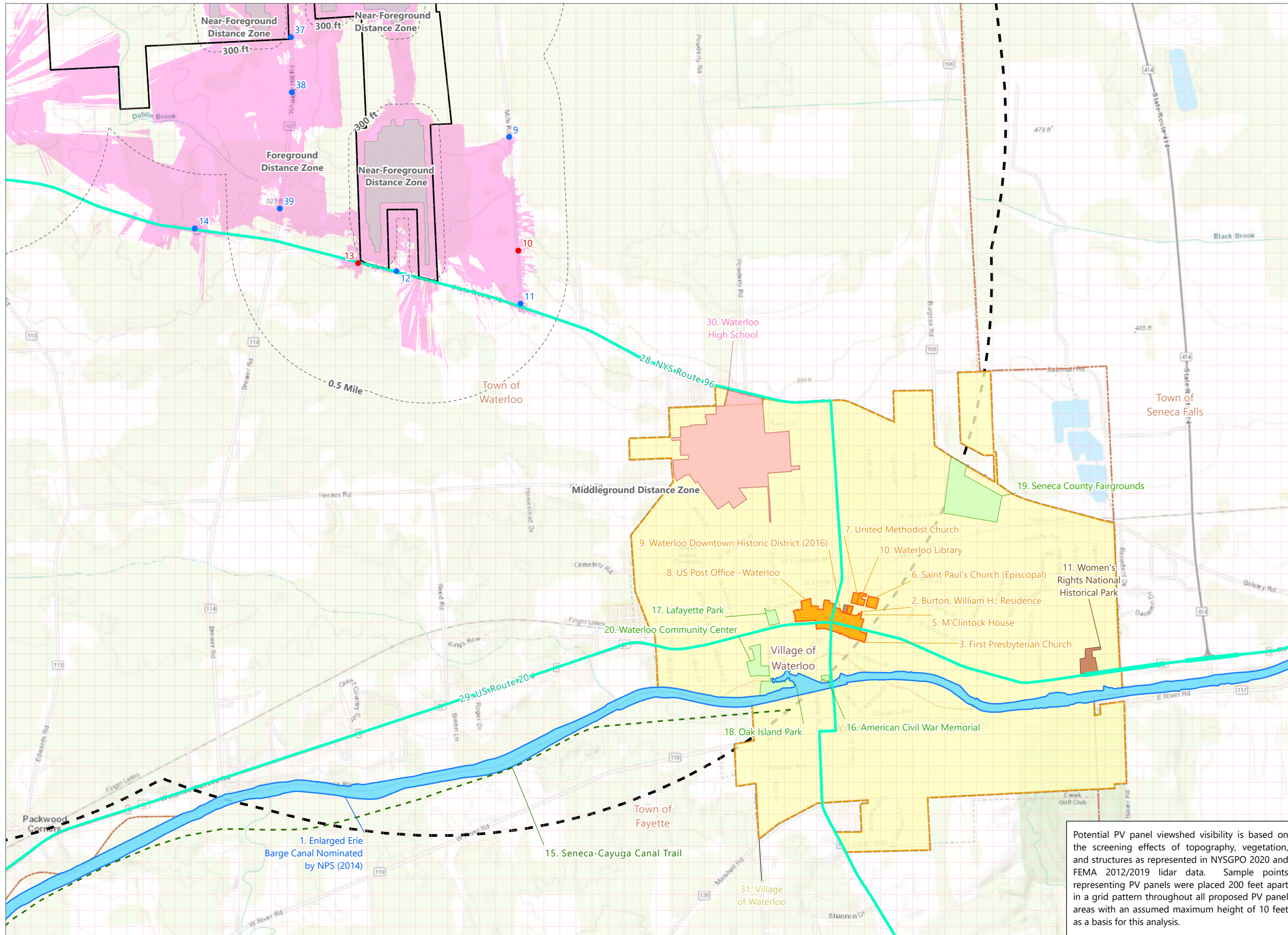
Visually Sensitive Resources

- Trail
- Bike Trail Route
- State/US/Interstate Highway
- Heritage Area
- Named Lake Pond and Reservoir
- National State Historic Landmark



Prepared October 12, 2023
Basemap: Esri "World Topographic Map" map service

Figure 2. Visually Sensitive Resources and Viewshed Results

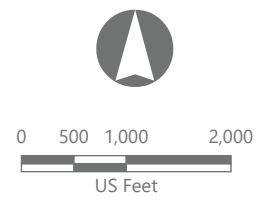
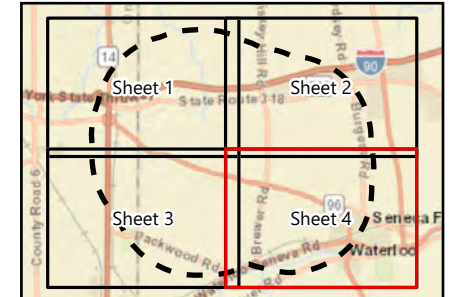


North Seneca Solar Project

Towns of Waterloo and Junius
 Seneca County, New York

Visual Impact Assessment Public Outreach Letter

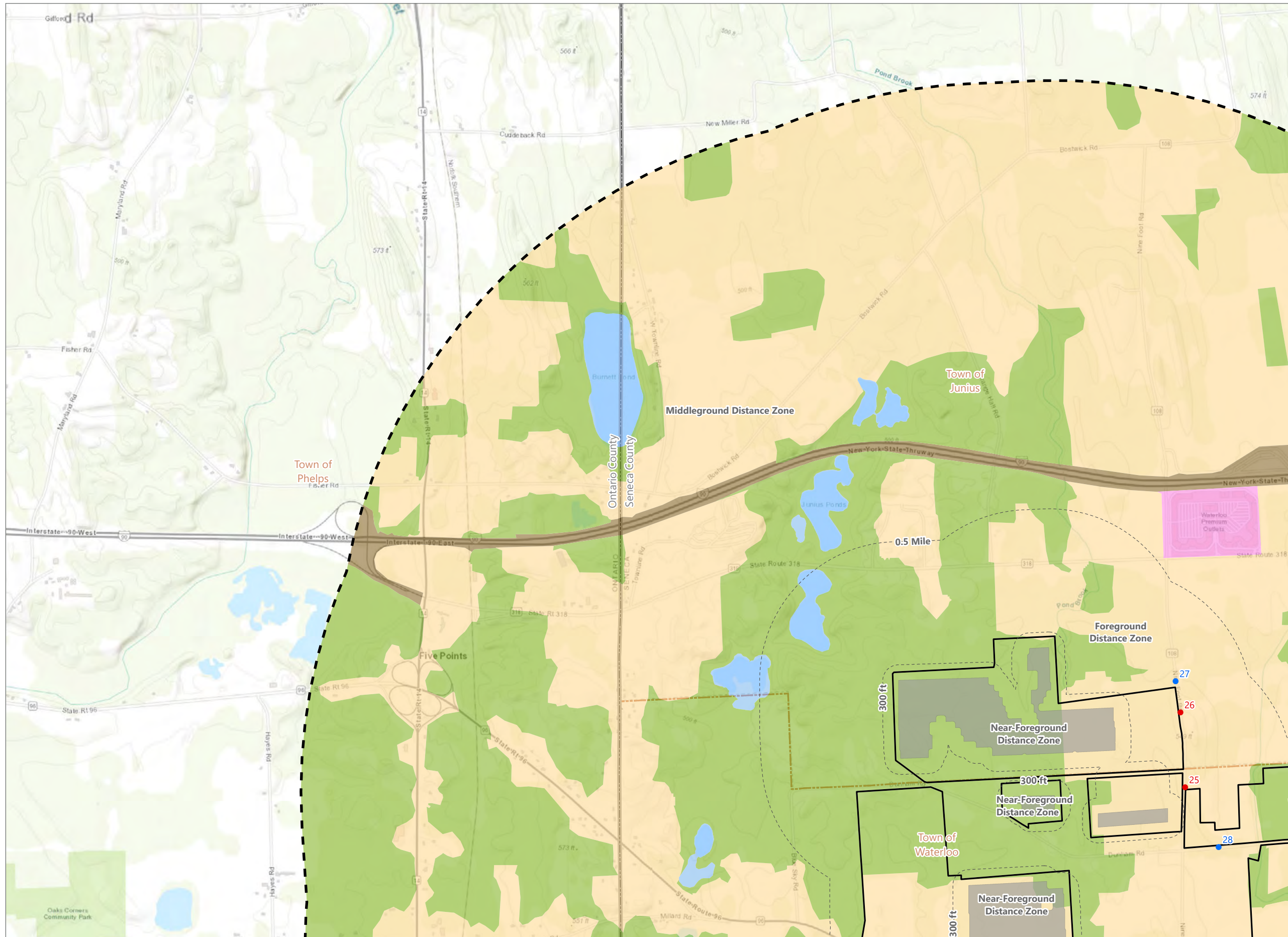
- Viewpoint Location**
- Recommended Viewpoint
 - Viewpoint Location
- Distance Zone**
- 2-Mile Visual Study Area
 - Distance Zone
- Facility Site**
- Facility Site
 - PV Array
 - PV Panel DSM Viewshed Visibility
- Visually Sensitive Resources**
- Trail
 - State/US/Interstate Highway
 - Heritage Area
 - Local Park/Recreation Area
 - National Park Recreation Area Seashore and Forest
 - National State Historic Landmark
 - NRHP-Listed Resource
 - School
 - Village



Potential PV panel viewshed visibility is based on the screening effects of topography, vegetation, and structures as represented in NYSGPO 2020 and FEMA 2012/2019 lidar data. Sample points representing PV panels were placed 200 feet apart in a grid pattern throughout all proposed PV panel areas with an assumed maximum height of 10 feet as a basis for this analysis.

Prepared October 12, 2023
 Basemap: Esri "World Topographic Map" map service

Figure 3. Landscape Similarity Zones

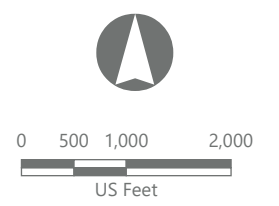
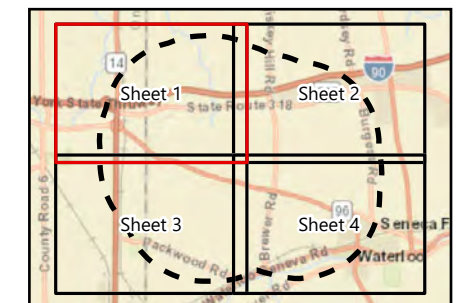


North Seneca Solar Project

Towns of Waterloo and Junius
Seneca County, New York

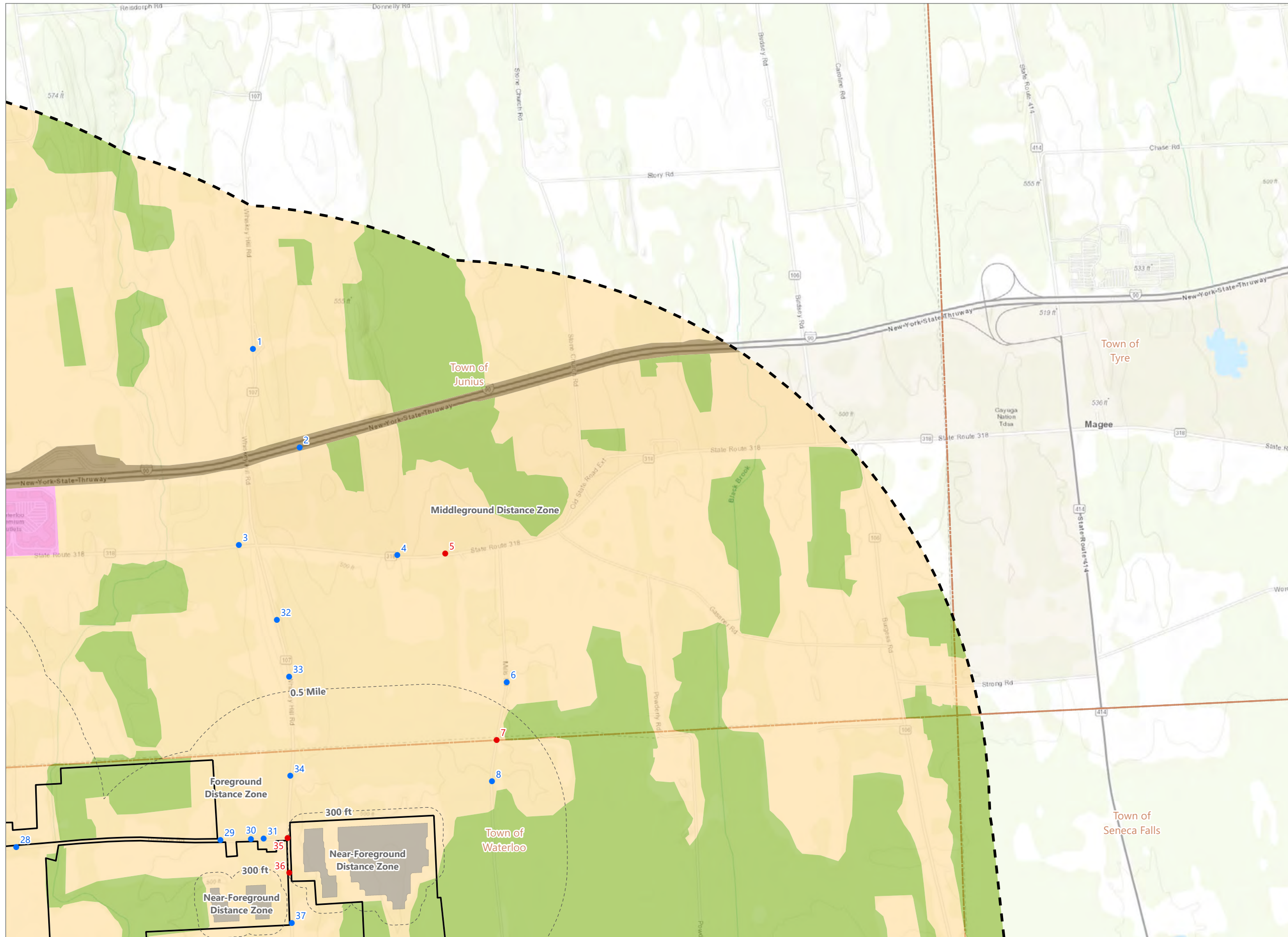
Visual Impact Assessment Public Outreach Letter

- Viewpoint Location
 - Recommended Viewpoint
 - Viewpoint Location
- 2-Mile Visual Study Area
- - - Distance Zone
- ▭ Facility Site
- PV Array
- Landscape Similarity Zone
 - Agricultural/Rural Residential
 - Commercial
 - Forest
 - Open Water
 - Transportation



Prepared October 12, 2023
Basemap: Esri "World Topographic Map" map service

Figure 3. Landscape Similarity Zones

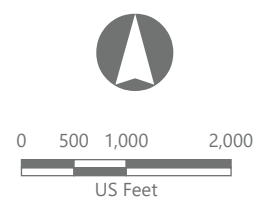
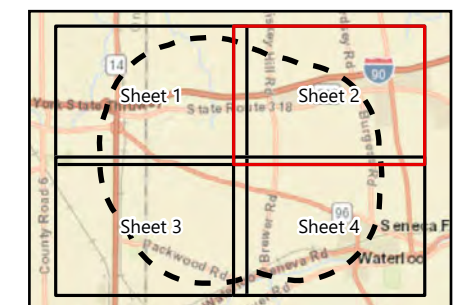


North Seneca Solar Project

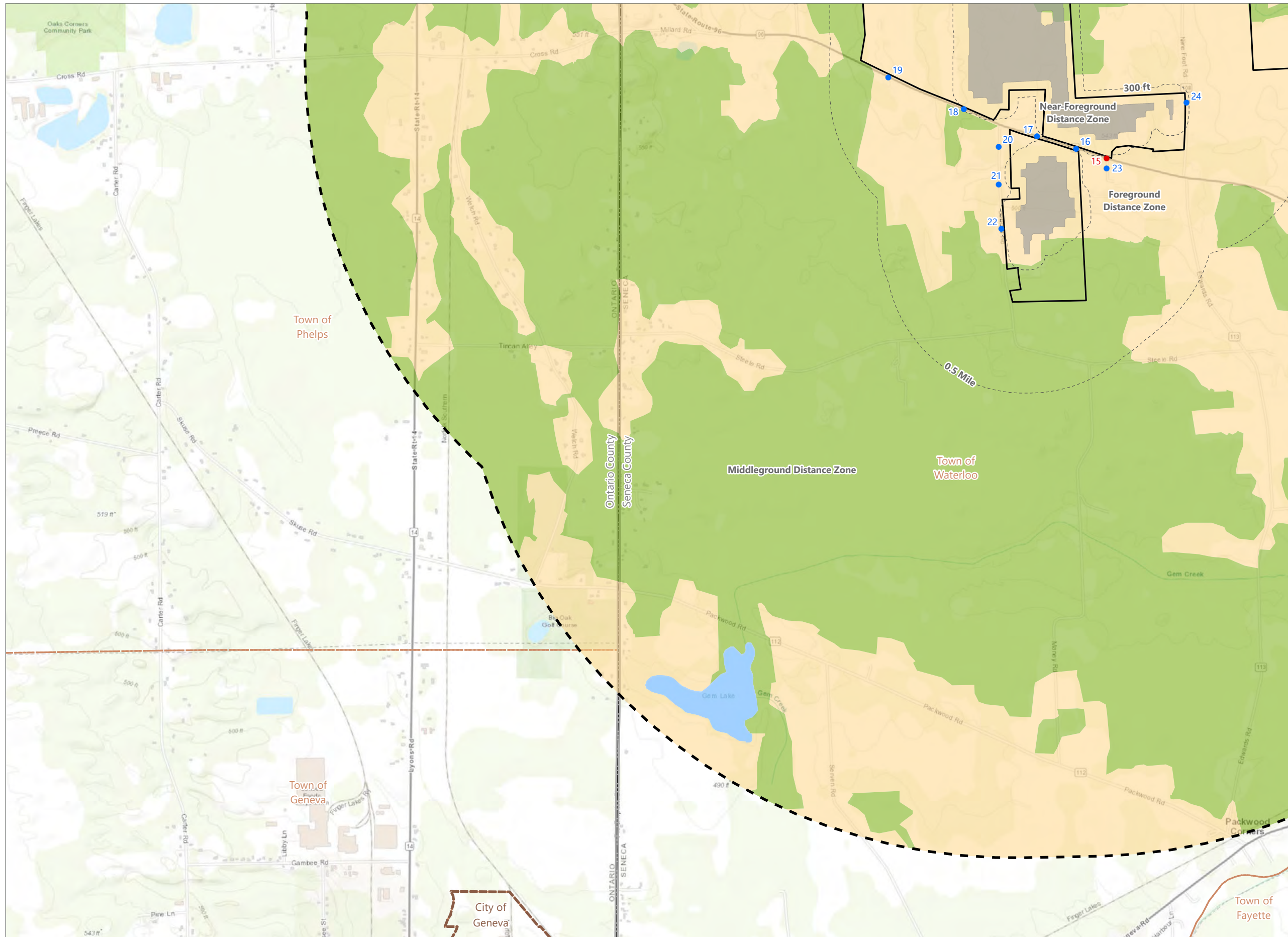
Towns of Waterloo and Junius
Seneca County, New York

**Visual Impact Assessment
Public Outreach Letter**

- Viewpoint Location
- Recommended Viewpoint
 - Viewpoint Location
- 2-Mile Visual Study Area
- Distance Zone
- Facility Site
- PV Array
- Landscape Similarity Zone**
- Agricultural/Rural Residential
 - Commercial
 - Forest
 - Transportation
 - Village



Prepared October 12, 2023
Basemap: Esri "World Topographic Map" map service

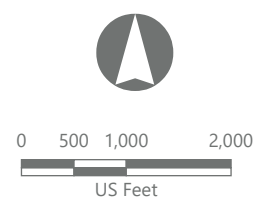
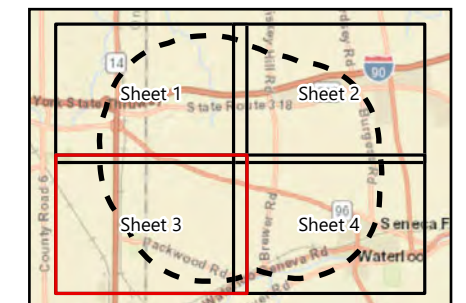


North Seneca Solar Project

Towns of Waterloo and Junius
Seneca County, New York

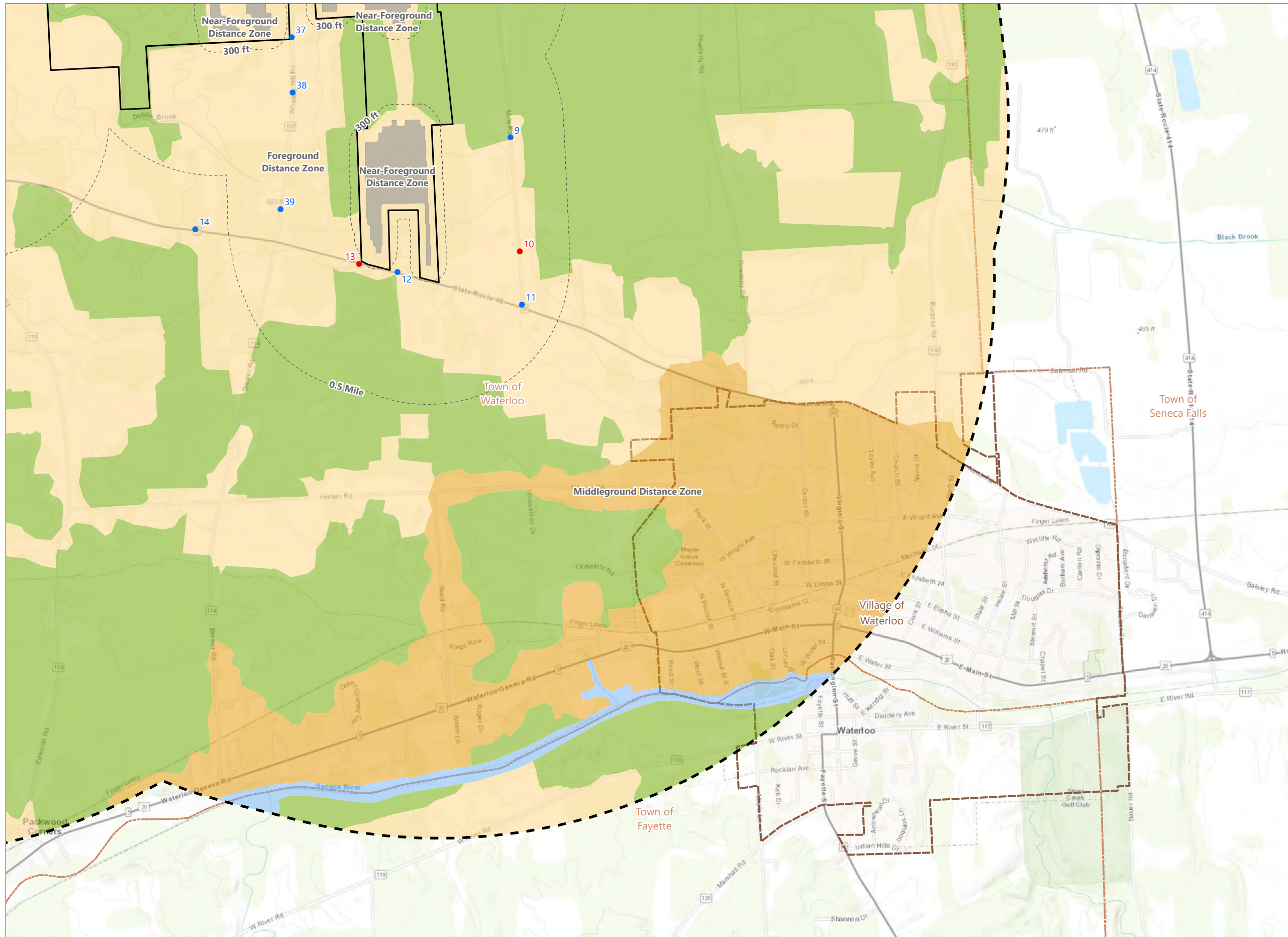
Visual Impact Assessment Public Outreach Letter

- Viewpoint Location
- Recommended Viewpoint
 - Viewpoint Location
 - 2-Mile Visual Study Area
 - Distance Zone
 - Facility Site
 - PV Array
- Landscape Similarity Zone
- Agricultural/Rural Residential
 - Forest
 - Open Water



Prepared October 12, 2023
Basemap: Esri "World Topographic Map" map service

Figure 3. Landscape Similarity Zones

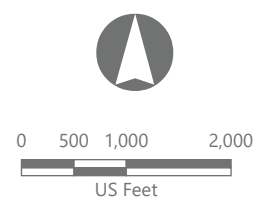
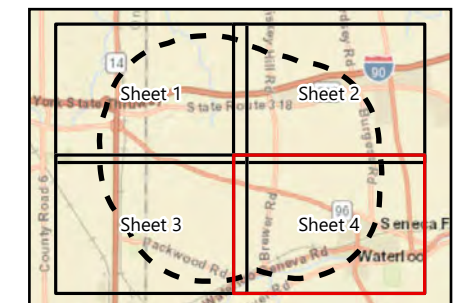


North Seneca Solar Project

Towns of Waterloo and Junius
Seneca County, New York

Visual Impact Assessment Public Outreach Letter

- Viewpoint Location
- Recommended Viewpoint
 - Viewpoint Location
 - 2-Mile Visual Study Area
 - - - Distance Zone
 - ▭ Facility Site
 - PV Array
- Landscape Similarity Zone
- Agricultural/Rural Residential
 - Forest
 - Open Water
 - Village



Prepared October 12, 2023
Basemap: Esri "World Topographic Map" map service

Attachment B: Distribution List

Attachment B: Distribution List

Representative	Mailing Address One	Mailing Address Two	City	State	Zip	Email Address
Town and Local Representatives						
C. Ernest Brownell, Supervisor	Town of Junius	655 Dublin Rd.	Clyde	NY	14433	erniebrownell@gmail.com
Colleen Smith, Town Clerk	Town of Junius	655 Dublin Rd.	Clyde	NY	14434	csmithjuniusclerk@gmail.com
Deb Patsos, Town Historian	Junius Town Historian	214 St. Rt. 414	Waterloo	NY	13165	dpatsos214@gmail.com
Don Trout, Town Supervisor	Town of Waterloo	66 Virginia St.	Waterloo	NY	13165	d-trout@live.com
Rosemarie Marsh, Town Clerk	Town of Waterloo	66 Virginia St.	Waterloo	NY	13165	rmarsh@townofwaterloo.org
Jim Cleere, Town Assessor/Code/Zoning	Town of Waterloo	66 Virginia St.	Waterloo	NY	13165	jcleere@townofwaterloo.org
Sandra L. Riley	Town of Waterloo	66 Virginia St.	Waterloo	NY	13165	sridley@townofwaterloo.org
Cyndi Park-Sheils	Waterloo Historical Society & Library	31 E. Williams Street	Waterloo	NY	13165	waterloolin@gmail.com
Jeff Trout, Supervisor	Town of Fayette	1439 Yellow Tavern Rd.	Waterloo	NY	13165	jhtrout@gmail.com
Macy Nesbit, Town Clerk	Town of Fayette	1439 Yellow Tavern Rd.	Waterloo	NY	13165	townclerk@townoffayetteny.org
Charles Kelsey, Chairman, Planning Board	Town of Fayette	3449 Parker Road	Seneca Falls	NY	13148	kelseyconstruction@yahoo.com
Robert Steele, Land Use Officer	Town of Fayette	1439 Yellow Tavern Rd.	Waterloo	NY	13165	Rsteele0932@yahoo.com
Emily Sisson	Fayette Historical Society	3681 State Route 414	Seneca Falls	NY	13148	emilie895@yahoo.com
Mark Venuti, Supervisor	Town of Geneva	3750 County Road 6	Geneva	NY	14456	supervisor@townofgeneva.com
Lorrie S. Naegele, Town Clerk	Town of Geneva	3750 County Road 6	Geneva	NY	14456	townclerk@townofgeneva.com
Floyd Kofahl, Code Enforcement Officer	Town of Geneva	3750 County Road 6	Geneva	NY	14456	codeenforcement1@townofgeneva.com
Norm Teed, Supervisor	Town of Phelps	1331 NYS Route 88	Phelps	NY	14532	super@phelpsnny.com

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach

Attachment B: Distribution List

Linda Nieskes, Town Clerk	Town of Phelps	1331 NYS Route 88	Phelps	NY	14532	tclerk@phelpsny.com
Steve Studley, Zoning/Planning Board	Town of Phelps	1331 NYS Route 88	Phelps	NY	14532	tzoning@phelpsny.com
Sarah Riegel, Phelps Town Historian	Phelps Community Historical Society Office and Museum	66 Main St.	Phelps	NY	14532	histoc2@gmail.com
Michael J. Ferrara, Supervisor	Town of Seneca Falls	130 Ovid Street	Seneca Falls	NY	13148	mferrara@co.seneca.ny.us
Nicaletta Greer, Town Clerk	Town of Seneca Falls	130 Ovid Street	Seneca Falls	NY	13148	ngreer@senecafalls.com
Peter Porcelli, Code Enforcement Officer	Town of Seneca Falls	130 Ovid Street	Seneca Falls	NY	13148	pporcelli@senecafalls.com
Frances Barbieri, Seneca Falls Historian	Town of Seneca Falls	2895 Garden Street Ext.	Seneca Falls	NY	13148	ftbarbieri@hotmail.com
Seneca Falls Historical Society	Seneca Falls Historical Society	55 Cayuga Street	Seneca Falls	NY	13148	sfhs@rochester.rr.com
Elizabeth Partee, Supervisor	Town of Tyre	1082 Gravel Rd.	Seneca Falls	NY	13148	supervisor@tyreny.com
Carolyn Sosnowski, Town Clerk	Town of Tyre	1082 Gravel Rd.	Seneca Falls	NY	13148	townclerk@tyreny.com
Ann Marie Heizmann, Zoning Enforcement Officer	Town of Tyre	1082 Gravel Rd.	Seneca Falls	NY	13148	zoningofficer@tyreny.com
Kathy Jans-Duffy, Town of Tyre Historian	Town of Tyre	1315 Middle Black Brook Road	Seneca Falls	NY	13148	kjansduffy@gmail.com
Don Northrup, Village Clerk	Village of Waterloo	41 West Main Street	Waterloo	NY	13165	villageoffice@waterloony.com
Lee Marquart, Code Enforcement Officer	Village of Waterloo	41 West Main Street	Waterloo	NY	13165	waterloocodes@waterloopd.com
County Representatives						
Kyle Lovell, County Manager	Seneca County	1 DiPronio Drive	Waterloo	NY	13165	klovell@seneca.ny.us
Jill Henry, Planning Board Director	Seneca County Planning and Community Development Department	1 DiPronio Drive	Waterloo	NY	13165	jhenry@co.seneca.ny.us
Walter Gable, County Historian	Seneca County Historian's Office	1 DiPronio Drive	Waterloo	NY	13165	wgable@co.seneca.ny.us

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach

Attachment B: Distribution List

State Agency Representatives						
Houtan Moaveni, Executive Director	Office of Renewable Energy Siting	Empire State Plaza, Swan Street – Core 1, Room #110-119	Albany	NY	12239	Houtan.Moaveni@ores.ny.gov
Kristy Primeau, Renewable Energy Siting Specialist 3	Office of Renewable Energy Siting	W.A. Harriman Campus Building 9, 1220 Washington Avenue	Albany	NY	12226	kristy.primeau@ores.ny.gov
Thaddeus Kolankowksi, RLA, Renewable Energy Siting Specialist 2	Office of Renewable Energy Siting	W.A. Harriman Campus Building 9, 1220 Washington Avenue	Albany	NY	12226	thaddeus.kolankowski@ores.ny.gov
Fred Bonn, Regional Director	NYS Office of Parks, Recreation and Historic Preservation, Region 4 - Finger Lakes	2221 Taughannock Road	Trumansburg	NY	14886	fred.bonn@parks.ny.gov
Office of Parks, Recreation and Historic Preservation	Submitted through the Cultural Resource Information System					
Indigenous Nation Representatives						
Chief Clint Halftown	Cayuga Nation	P.O. Box 803	Seneca Falls	NY	13148	clint.halftown@gmail.com
Chief Sam George	Cayuga Nation	P.O. Box 433	Union Springs	NY	13160	sevenclansam@gmail.com
Dr. Joe Stahlman, Director - Tribal Historic Preservation Officer Seneca Nation of Indiana	Seneca-Iroquois National Museum Onōhsagwë: De' Cultural Center	82 West Hetzel Street	Salamanca	NY	14779	joe.stahlman@sni.org
Chief Roger Hill and Ms. Christine Abrams	Tonawanda Seneca Nation	Tonawanda Seneca Nation	Basom	NY	14013	tonseneca@aol.com

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach

Attachment C: Visually Sensitive Resources

Attachment C: Visually Sensitive Resource Table

Visually Sensitive Resource	Resource Number	Location		Representative Viewpoint Number(s) ¹	Distance Zone ²	PV Panel Visibility (DSM viewshed results)	
		Municipality	County			Visible (+)	Not Visible (-)
Properties of Historic Significance [6 NYCRR 617.4 (b)(9)]							
National/State Historic Landmarks							
Enlarged Erie Barge Canal Nominated by NPS (2014)	1	Towns of Fayette, Seneca Falls, Tyre, and Waterloo	Seneca		Middle ground	-	
Properties/Districts Listed on National or State Registers of Historic Places (NRHP/SRHP)							
Burton, William H., Residence	2	Town of Waterloo	Seneca		Middle ground	-	
First Presbyterian Church	3	Town of Waterloo	Seneca		Middle ground	-	
Graves, John, Cobblestone Farmhouse	4	Town of Junius	Seneca		Middle ground	-	
M'Clintock House	5	Town of Waterloo	Seneca		Middle ground	-	
Saint Paul's Church (Episcopal)	6	Town of Waterloo	Seneca		Middle ground	-	
United Methodist Church	7	Town of Waterloo	Seneca		Middle ground	-	
US Post Office--Waterloo	8	Town of Waterloo	Seneca		Middle ground	-	
Waterloo Downtown Historic District (2016)	9	Town of Waterloo	Seneca		Middle ground	-	
Waterloo Library	10	Town of Waterloo	Seneca		Middle ground	-	
Properties Eligible for Listing on National or State Registers of Historic Places							
Not identified at this time.							
Designated Scenic Resources							
Rivers Designated as National or State Wild, Scenic or Recreational							
None Identified							
Adirondack Park Scenic Vistas [Adirondack Park Land Use and Development Map]							
None Identified							
Sites, Areas, Lakes, Reservoirs or Highways Designated or Eligible for Designation as Scenic ([ECL Article 49 Title 1] or equivalent)							
None Identified							
Scenic Areas of Statewide Significance [Article 42 of Executive Law]							
None Identified							
Other Designated Scenic Resources (Easements, Roads, Districts, and Overlooks)							
None Identified							
Public Lands and Recreational Resources							
National Parks, Recreation Areas, Seashores, and Forests [16 U.S.C. 1c]							
Women's Rights National Historical Park	11	Towns of Seneca Falls and Waterloo	Seneca		Middle ground	-	
National Natural Landmarks [36 CFR Part 62]							
None Identified							

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach

Attachment C: Visually Sensitive Resource Table

Visually Sensitive Resource	Resource Number	Location		Representative Viewpoint Number(s) ¹	Distance Zone ²	PV Panel Visibility (DSM viewshed results)	
		Municipality	County			Visible (+)	Not Visible (-)
National Wildlife Refuges [16 U.S.C. 668dd]							
None Identified							
Heritage Areas (formerly Urban Cultural Parks) [Parks, Recreation and Historic Preservation Law Section 35.15]							
Erie Canalway National Heritage Corridor	12	Towns of Fayette, Geneva, Junius, Phelps, Seneca Falls, Tyre, and Waterloo	Seneca, Ontario	7-26, 28-31, 34-39	Near-Foreground, Foreground, Middle ground		+
State Parks [Parks, Recreation and Historic Preservation Law Section 3.09]							
None Identified							
State Nature and Historic Preserve Areas [Section 4 of Article XIV of the State Constitution]							
None Identified							
State Forest Preserve [NYS Constitution Article XIV]							
None Identified							
Other State Lands							
Junius Pond Unique Area	13	Towns of Junius and Waterloo	Seneca		Foreground, Middle ground		-
Wildlife Management Areas & Game Refuges							
None Identified							
State Forests							
None Identified							
State Fishing/Waterway Access Sites							
None Identified							
Trails							
<i>State and Federal Trails³</i>							
None Identified							
<i>Snowmobile/ATV Trails</i>							
None Identified							
<i>Bike Trails/Routes</i>							
State Bike Route 14	14	Towns of Geneva and Phelps	Ontario		Middle ground		-
<i>Other Trails</i>							
Seneca-Cayuga Canal Trail	15	Towns of Fayette and Waterloo	Seneca		Middle ground		-
Palisades Park [Palisades Interstate Park Commission]							
Not Applicable							
Local Parks and Recreation Areas							
American Civil War Memorial	16	Town of Fayette	Seneca		Middle ground		-
Lafayette Park	17	Town of Waterloo	Seneca		Middle ground		-
Oak Island Park	18	Towns of Fayette and Waterloo	Seneca		Middle ground		-

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach

Attachment C: Visually Sensitive Resource Table

Visually Sensitive Resource	Resource Number	Location		Representative Viewpoint Number(s) ¹	Distance Zone ²	PV Panel Visibility (DSM viewshed results)	
		Municipality	County			Visible (+)	Not Visible (-)
Seneca County Fairgrounds	19	Town of Waterloo	Seneca		Middle ground	-	
Waterloo Community Center	20	Town of Waterloo	Seneca		Middle ground	-	
Publicly Accessible Conservation Lands/Easements							
None Identified							
Rivers and Streams with Public Fishing Rights Easements							
None Identified							
Named Lakes, Ponds, and Reservoirs							
Bullhead Pond	21	Town of Waterloo	Seneca		Middle ground	-	
Burnett Pond	22	Town of Junius and Phelps	Seneca, Ontario		Middle ground	-	
Gem Lake	23	Town of Waterloo	Seneca		Middle ground	-	
Junius Ponds	24	Town of Junius	Seneca		Middle ground	-	
High-Use Public Areas							
State, US, and Interstate Highways							
Interstate 90	25	Towns of Junius, Phelps, and Tyre	Seneca, Ontario	2	Middle ground	+	
NYS Route 14	26	Towns of Geneva and Phelps	Ontario		Middle ground	-	
NYS Route 318	27	Towns of Junius, Phelps, Seneca Falls, and Tyre	Seneca, Ontario	3-5	Middle ground	+	
NYS Route 96	28	Towns of Fayette, Phelps, and Waterloo	Seneca, Ontario	11-19	Near-Foreground, Foreground, Middle ground	+	
US Route 20	29	Towns of Geneva, Seneca Falls, Tyre, and Waterloo	Seneca, Ontario		Middle ground	-	
Schools							
Waterloo High School	30	Town of Waterloo	Seneca		Middle ground	-	
Cities, Villages, Hamlets							
<i>Cities and Villages</i>							
Village of Waterloo	31	Towns of Fayette, Seneca Falls, and Waterloo	Seneca		Middle ground	-	
<i>Hamlets</i>							
None Identified							
Native American Lands							
None Identified							
Resources Identified through Visual Outreach							
None identified at this time.							

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach

Attachment C: Visually Sensitive Resource Table

Visually Sensitive Resource	Resource Number	Location		Representative Viewpoint Number(s) ¹	Distance Zone ²	PV Panel Visibility (DSM viewshed results)	
		Municipality	County			Visible (+)	Not Visible (-)

¹ Identified viewpoints are within 150 feet of the visually sensitive resource boundary. If no viewpoint number is indicated, no photos were obtained near this resource during fieldwork.

² For resources with potential PV panel visibility, the distance zone is based upon where PV panel visibility falls within the resource boundary.

³ State trails that occur within state lands are not identified individually, and are evaluated within the Visual Impact Assessment as part of the overall resource.

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach

Attachment D: Viewpoint Photolog

Attachment D. Viewpoint Photolog



Viewpoint 1 | Panorama

Panorama composition panning southeast to southwest



View looking south from Whiskey Hill Road in the Town of Junius, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Middle ground

Visually Sensitive Resource(s):
None Identified

Coordinates:
42.96506°N , 76.90433°W

Elevation:
512 ft.

Viewpoint 1 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 2 | Panorama

Panorama composition panning southeast to southwest



Viewpoint 2 | Single Frame

View looking south from
Interstate 90 Eastbound in the
Town of Junius, Seneca County,
New York

Landscape Similarity Zone:
Transportation

Distance Zone:
Middle ground

Visually Sensitive Resource(s):
VSR ID # 25 - Interstate 90

Coordinates:
42.95993°N , 76.90100°W

Elevation:
496 ft.

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach

Attachment D. Viewpoint Photolog



Viewpoint 3 | Panorama

Panorama composition panning southeast to southwest



View looking south from State Route 318 in the Town of Junius, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Middle ground

Visually Sensitive Resource(s):
VSR ID # 27 - NYS Route 318

Coordinates:
42.95484°N , 76.90528°W

Elevation:
514 ft.

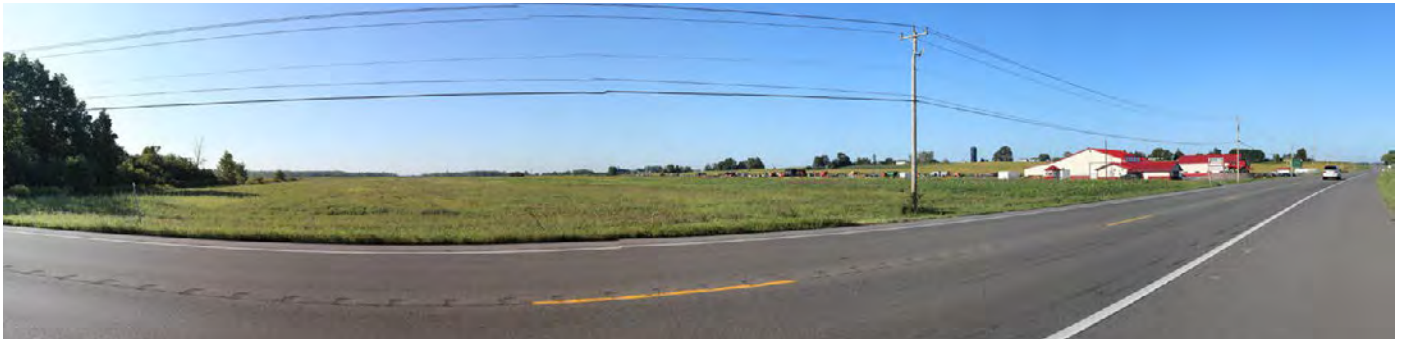
Viewpoint 3 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach

Attachment D. Viewpoint Photolog



Viewpoint 4 | Panorama

Panorama composition panning southeast to west



View looking south from State Route 318 in the Town of Junius, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Middle ground

Visually Sensitive Resource(s):
VSR ID # 27 - NYS Route 318

Coordinates:
42.95433°N , 76.89403°W

Elevation:
504 ft.

Viewpoint 4 | Single Frame

North Seneca Solar Project

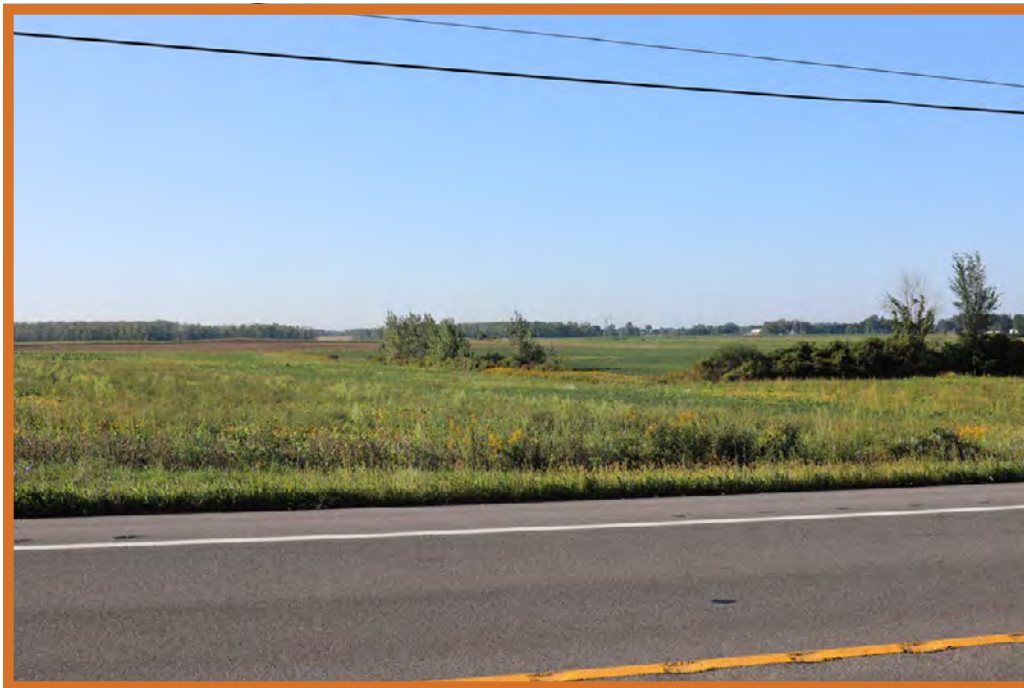
Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 5 | Panorama

Panorama composition panning southeast to southwest



View looking south from State Route 318 in the Town of Junius, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Middle ground

Visually Sensitive Resource(s):
VSR ID # 27 - NYS Route 318

Coordinates:
42.95443°N , 76.89063°W

Elevation:
517 ft.

Viewpoint selected for simulation development

Viewpoint 5 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach

Attachment D. Viewpoint Photolog



Viewpoint 6 | Panorama
Panorama composition panning south to north



View looking southwest from Mills Road in the Town of Junius, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Middle ground

Visually Sensitive Resource(s):
None Identified

Coordinates:
42.94773°N , 76.88624°W

Elevation:
502 ft.

Viewpoint 6 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach

Attachment D. Viewpoint Photolog



Viewpoint 7 | Panorama
Panorama composition panning south to west



Viewpoint 7 | Single Frame

View looking southwest from Mills Road in the Town of Junius, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor

Coordinates:
42.94473°N , 76.88693°W

Elevation:
501 ft.

Viewpoint selected for simulation development

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 8 | Panorama

Panorama composition panning south to north



View looking southwest from Mills Road in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor

Coordinates:
42.94256°N , 76.88726°W

Elevation:
498 ft.

Viewpoint 8 | Single Frame

North Seneca Solar Project

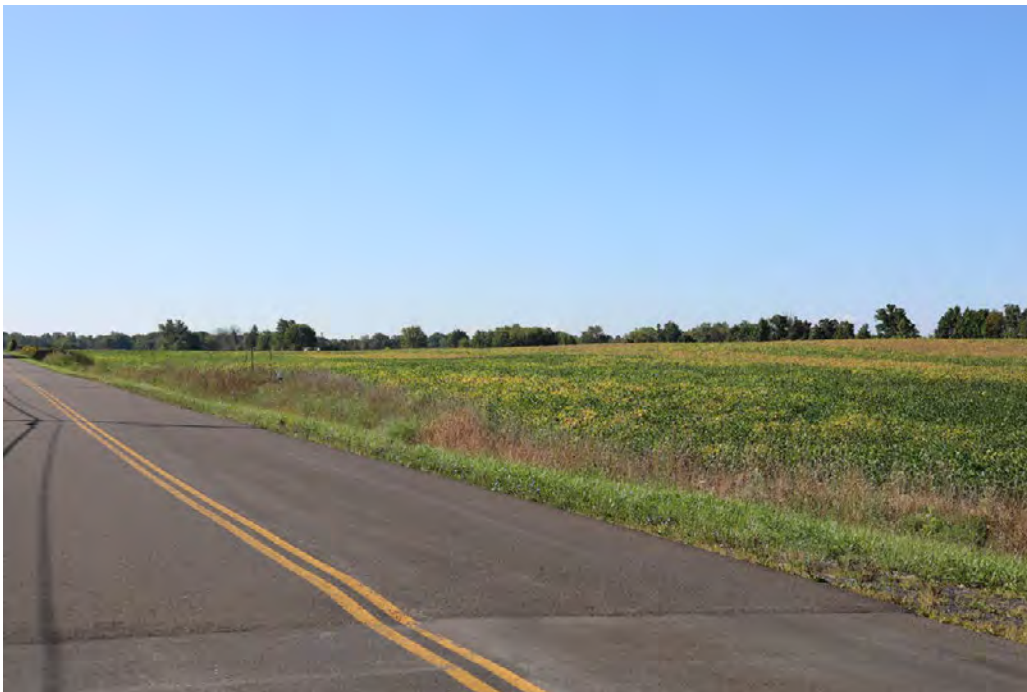
Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 9 | Panorama

Panorama composition panning south to west



View looking southwest from
Mills Road in the Town of
Waterloo, Seneca County, New
York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National
Heritage Corridor

Coordinates:
42.92996°N , 76.88588°W

Elevation:
496 ft.

Viewpoint 9 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 10 | Panorama
Panorama composition panning south to north



Viewpoint 10 | Single Frame

View looking west from Mills Road in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor

Coordinates:
42.92403°N , 76.88519°W

Elevation:
497 ft.

Viewpoint selected for simulation development

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 11 | Panorama

Panorama composition panning southwest to north



View looking northwest from Mills Road in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor,
VSR ID # 28 - NYS Route 96

Coordinates:
42.92126°N , 76.88503°W

Elevation:
488 ft.

Viewpoint 11 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 12 | Panorama
 Panorama composition panning west to east



View looking northwest from State Route 96 in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
 Agricultural/Rural Residential

Distance Zone:
 Foreground

Visually Sensitive Resource(s):
 VSR ID # 12 - Erie Canalway National Heritage Corridor,
 VSR ID # 28 - NYS Route 96

Coordinates:
 42.92294°N , 76.89386°W

Elevation:
 492 ft.

Viewpoint 12 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 13 | Panorama

Panorama composition panning northwest to northeast



View looking north from State Route 96 in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor,
VSR ID # 28 - NYS Route 96

Coordinates:
42.92335°N , 76.89658°W

Elevation:
504 ft.

Viewpoint selected for simulation development

Viewpoint 13 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 14 | Panorama

Panorama composition panning northwest to northeast



View looking northwest from State Route 96 in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Middle ground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor,
VSR ID # 28 - NYS Route 96

Coordinates:
42.92512°N , 76.90821°W

Elevation:
504 ft.

Viewpoint 14 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 15 | Panorama

Panorama composition panning west to east



Viewpoint 15 | Single Frame

View looking northwest from State Route 96 and Hidden Spring Lane in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor,
VSR ID # 28 - NYS Route 96

Coordinates:
42.92874°N , 76.92889°W

Elevation:
529 ft.

Viewpoint selected for simulation development

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 16A | Panorama

Panorama composition panning west to east



View looking northeast from State Route 96 in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Near-Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor,
VSR ID # 28 - NYS Route 96

Coordinates:
42.92925°N , 76.93105°W

Elevation:
514 ft.

Viewpoint 16A | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 16B | Panorama

Panorama composition panning east to west



View looking southwest from State Route 96 in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Near-Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor,
VSR ID # 28 - NYS Route 96

Coordinates:
42.92925°N , 76.93105°W

Elevation:
514 ft.

Viewpoint 16B | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 17A | Panorama

Panorama composition panning north to east



Viewpoint 17A | Single Frame

View looking northeast from State Route 96 in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor,
VSR ID # 28 - NYS Route 96

Coordinates:
42.92988°N , 76.93383°W

Elevation:
510 ft.

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 17B | Panorama

Panorama composition panning east to southeast



View looking south from State Route 96 in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor,
VSR ID # 28 - NYS Route 96

Coordinates:
42.92988°N , 76.93383°W

Elevation:
510 ft.

Viewpoint 17B | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 18 | Panorama

Panorama composition panning north to east



View looking northeast from State Route 96 in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Near-Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor,
VSR ID # 28 - NYS Route 96

Coordinates:
42.93128°N , 76.93903°W

Elevation:
500 ft.

Viewpoint 18 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 19 | Panorama

Panorama composition panning northwest to southeast



View looking east from State Route 96 in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor,
VSR ID # 28 - NYS Route 96

Coordinates:
42.93292°N , 76.9444°W

Elevation:
514 ft.

Viewpoint 19 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 20 | Panorama

Panorama composition panning north to southeast



View looking southeast from
Bonnell Road in the Town of
Waterloo, Seneca County, New
York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National
Heritage Corridor

Coordinates:
42.92933°N , 76.93654°W

Elevation:
512 ft.

Viewpoint 20 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 21 | Panorama

Panorama composition panning northeast to southeast



View looking east from Bonnell Road in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor

Coordinates:
42.92737°N , 76.93654°W

Elevation:
507 ft.

Viewpoint 21 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 22 | Panorama

Panorama composition panning northeast to southeast



View looking northeast from
Bonnell Road in the Town of
Waterloo, Seneca County, New
York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National
Heritage Corridor

Coordinates:
42.92505°N , 76.93633°W

Elevation:
491 ft.

Viewpoint 22 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 23 | Panorama

Panorama composition panning southwest to north



View looking north from Hidden Spring Lane in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor

Coordinates:
42.92823°N , 76.92889°W

Elevation:
526 ft.

Viewpoint 23 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 24 | Panorama

Panorama composition panning southwest to northwest



View looking west from Ninefoot Road in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Near-Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor

Coordinates:
42.93168°N , 76.92324°W

Elevation:
516 ft.

Viewpoint 24 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 25 | Panorama
Panorama composition panning south to north



View looking west from Ninefoot Road in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor

Coordinates:
42.94215°N , 76.92339°W

Elevation:
502 ft.

Viewpoint selected for simulation development

Viewpoint 25 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach

Attachment D. Viewpoint Photolog



Viewpoint 26 | Panorama
Panorama composition panning south to northwest



View looking west from Ninefoot Road in the Town of Junius, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor

Coordinates:
42.94606°N , 76.92375°W

Elevation:
538 ft.

Viewpoint selected for simulation development

Viewpoint 26 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 27 | Panorama
Panorama composition panning south to north



View looking west from Ninefoot Road in the Town of Junius, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
None Identified

Coordinates:
42.94768°N , 76.92409°W

Elevation:
508 ft.

Viewpoint 27 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 28 | Panorama

Panorama composition panning southwest to northwest



View looking northwest from Dunham Road in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor

Coordinates:
42.93905°N , 76.92100°W

Elevation:
498 ft.

Viewpoint 28 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach

Attachment D. Viewpoint Photolog



Viewpoint 29 | Panorama

Panorama composition panning east to southwest



View looking south from Dunham Road in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor

Coordinates:
42.93945°N , 76.90651°W

Elevation:
505 ft.

Viewpoint 29 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach

Attachment D. Viewpoint Photolog



Viewpoint 30 | Panorama

Panorama composition panning east to west



View looking south from Dunham Road in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor

Coordinates:
42.93951°N , 76.90434°W

Elevation:
517 ft.

Viewpoint 30 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach

Attachment D. Viewpoint Photolog



Viewpoint 31 | Panorama

Panorama composition panning east to west



View looking east from Dunham Road in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor

Coordinates:
42.93955°N , 76.90345°W

Elevation:
519 ft.

Viewpoint 31 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 32 | Panorama

Panorama composition panning southeast to southwest



View looking south from Whiskey Hill Road in the Town of Junius, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Middle Ground

Visually Sensitive Resource(s):
None Identified

Coordinates:
42.95094°N , 76.90256°W

Elevation:
559 ft.

Viewpoint 32 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 33 | Panorama

Panorama composition panning southeast to southwest



View looking south from Whiskey Hill Road in the Town of Junius, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Middle ground

Visually Sensitive Resource(s):
None Identified

Coordinates:
42.94798°N , 76.90168°W

Elevation:
553 ft.

Viewpoint 33 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach

Attachment D. Viewpoint Photolog



Viewpoint 34 | Panorama

Panorama composition panning southeast to southwest



View looking southeast from Whiskey Hill Road in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor

Coordinates:
42.94281°N , 76.90157°W

Elevation:
501 ft.

Viewpoint 34 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 35 | Panorama
 Panorama composition panning north to south



Viewpoint 35 | Single Frame

View looking east from Whiskey Hill Road and Dunham Road in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
 Agricultural/Rural Residential

Distance Zone:
 Foreground

Visually Sensitive Resource(s):
 VSR ID # 12 - Erie Canalway National Heritage Corridor

Coordinates:
 42.93956°N , 76.90174°W

Elevation:
 509 ft.

Viewpoint selected for simulation development

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 36A | Panorama

Panorama composition panning east to southwest



View looking east from Whiskey Hill Road in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Near-Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor

Coordinates:
42.93776°N , 76.90161°W

Elevation:
513 ft.

Viewpoint 36A | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 36B | Panorama

Panorama composition panning east to southwest



View looking southwest from Whiskey Hill Road in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Near-Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National Heritage Corridor

Coordinates:
42.93776°N , 76.90161°W

Elevation:
513 ft.

Viewpoint selected for simulation development

Viewpoint 36B | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 37 | Panorama
 Panorama composition panning west to northeast



View looking west from Whiskey Hill Road in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
 Agricultural/Rural Residential

Distance Zone:
 Foreground

Visually Sensitive Resource(s):
 VSR ID # 12 - Erie Canalway National Heritage Corridor

Coordinates:
 42.93515°N , 76.90143°W

Elevation:
 513 ft.

Viewpoint 37 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach

Attachment D. Viewpoint Photolog



Viewpoint 38 | Panorama
Panorama composition panning north to east



Viewpoint 38 | Single Frame

View looking north from
Whiskey Hill Road in the Town of
Waterloo, Seneca County, New
York

Landscape Similarity Zone:
Agricultural/Rural Residential

Distance Zone:
Foreground

Visually Sensitive Resource(s):
VSR ID # 12 - Erie Canalway National
Heritage Corridor

Coordinates:
42.93227°N , 76.90134°W

Elevation:
516 ft.

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach



Viewpoint 39 | Panorama
 Panorama composition panning north to south



View looking east from Whiskey Hill Road in the Town of Waterloo, Seneca County, New York

Landscape Similarity Zone:
 Agricultural/Rural Residential

Distance Zone:
 Foreground

Visually Sensitive Resource(s):
 VSR ID # 12 - Erie Canalway National Heritage Corridor

Coordinates:
 42.92618°N , 76.90217°W

Elevation:
 525 ft.

Viewpoint 39 | Single Frame

North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Visual Outreach

View and/or Address a Response

Project 22PR05554: North Seneca Solar Project/105 MW/1909 Acres (E6WN5UFI6JDK)

REDACTED – Permit Application No. 23-00036

 View Project

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


Review Responses

Reviewer	Review Type	Response
Virginia Bartos	Survey and Evaluation	Solar Guidance document provided

Information Requests

Process	Status	Reviewer	Review Type	Request Type	Request Entity	Request Item	Request Description
No Request Records							

Attachments

Attachment	Reviewer	Review Type	Type	Name	Description
	Virginia Bartos	Survey and Evaluation	Document	North Seneca Solar	SHPO guidance document

New York State Historic Preservation Office
Guidelines for Solar Facility Development Cultural Resources Survey Work
 (5-2021)

The New York State Office of Parks, Recreation and Historic Preservation’s Division for Historic Preservation (“Division”) has established the following guidance for the assessment of historic and cultural resources associated with the development of ground-mounted solar facility projects in New York State.

Visual Impact Area for Historic Resources

Establish a project Zone of Visual Impact (“ZVI”) as follows:

1. Solar arrays covering less than 50 acres.
 - a. Documentation* of all properties that are 50-years of age or older that are within or immediately adjacent to the project boundaries. Immediately adjacent includes buildings whose property lines abut the project boundary as well as those that are across roads or adjacent fields from project boundary.
2. Solar arrays covering 50 to 200 acres.
 - a. Complete a GIS analysis of areas that will have positive visibility of the solar field based upon topography and estimated existing vegetation heights. A survey** of all properties 50-years old or older within 0.5-mile of the solar array ZVI should be completed by a 36 CFR 61 qualified consultant.
3. Solar arrays covering more than 200 acres.
 - a. Complete a GIS analysis of areas that will have positive visibility of the solar field based upon topography and estimated existing vegetation heights.
 - b. A survey** of all properties 50 years old or older within 1-mile of the solar array ZVI should be completed by a 36 CFR 61 qualified consultant.
4. The NYSOPRHP-DHP may seek additional assessments for National Register-listed properties or National Historic Landmarks at greater distances, if it is believed that there may be a visual impact associated with the proposed new solar project.

**Documentation will include digital images of main building(s) and outbuilding(s), street address, map location, and date of construction (if known).*

*** The determined distance of survey from the solar field is for those areas that fall within the ZVI as established by the GIS analysis only. Qualified (36 CFR 61) consultants are required to document only those properties that in their professional opinion may meet the National Register criteria.*

Historic Resources Survey

1. The survey will initially identify all properties (buildings, structures, sites, historic districts) within the ZVIs defined above that were previously determined eligible for inclusion in or are already listed in the New York State and National Registers of Historic Places using the Division’s Cultural Resource Information System (CRIS).
2. The Division’s Survey/National Register Unit staff will assess eligibility for all newly identified properties as well as properties recorded in previous survey efforts whose integrity has changed significantly since the original determination.
3. For documentation of buildings in Category 1 above (less than 50 acres), the Division will assess submitted building information for eligibility directly. While a full Survey Report is not required for projects of this scale, documentation must include, at a minimum, clear digital images taken from ground level and showing the front and sides of the main building and any associated outbuildings; address and map location; and date of construction (if known).
4. For survey of Visual Impact Area Categories 2 & 3 above (greater than 50 acres), the following process will apply:
 - a. Surveyor needs to be 36 CFR 61 qualified to make determinations of National Register eligibility.
 - b. Surveyor will submit the proposed ZVI and Methodology/Survey Work Plan to CRIS prior to undertaking any survey field work.
 - c. Upon approval of the ZVI and Methodology/Survey Work Plan, the project surveyor will be given access to the Trekker mobile survey application for the survey field work.

- d. Upon completion of the field work the surveyor will submit the digital Trekker survey forms for review by Survey/National Register Unit staff.
- e. The final steps in the survey process will be to submit a pdf of the Historic Resources Survey Report and a separate Annotated Properties List in Excel via CRIS. The standalone Excel spreadsheet is to include the following fields: property name (if any); address; municipality; county; USN (if any); current NRHP status; current/proposed NRHP criteria/recommended area(s) of significance; integrity; recommended NRHP status; and a primary image.

From: [New York State Parks CRIS Application](#)
To: [Doug Pippin](#)
Cc: [Grant Johnson](#); [William Whipps](#); [Matthew Weiss](#); [Laurie Reynolds](#); cdohoney@savionenergy.com; Kristy.Primeau@ores.ny.gov; Andrea.Zlotucha.Kozub; Jennifer.Betsworth@ores.ny.gov; [Kristen Olson](#); ckaynor@savionenergy.com
Subject: NY SHPO: Requested Submission FXW1EBESK3BV Received for Consultation Project 22PR05554
Date: Friday, January 5, 2024 4:58:30 PM

[EXTERNAL SENDER]

Requested Submission Received

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

Requested Submission Token: FXW1EBESK3BV

Project Number: 22PR05554

Project Type: Consultation

Project Name: North Seneca Solar Project/105 MW/1909 Acres

Consolidated Response Token: E75XGNQL8SJB

Previous Submission Number: 22PR05554.008

Open Request: Please upload the Survey Report after the Trekker Surveys are complete.

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

New York State Historic Preservation Office

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

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

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

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

Who sent this email?

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

This message pertains to a submission for a consultation project. Please see SHPO's [Environmental](#)

[Review](#) web page for more information about the consultation process.

Why did I receive this email?

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

What do I need to do?

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

What will happen next?

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

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

What else can I do?

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

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

Where can I get help?

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

If you still have questions about CRIS, please contact CRIS Help at CRISHelp@parks.ny.gov.

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

From: [New York State Parks CRIS Application](#)
To: [Doug Pippin](#)
Cc: [Grant Johnson](#); [William Whipps](#); [Matthew Weiss](#); [Laurie Reynolds](#); cdohoney@savionenergy.com; Kristy.Primeau@ores.ny.gov; Andrea.Zlotucha.Kozub; Jennifer.Betsworth@ores.ny.gov; [Kristen Olson](#); ckaynor@savionenergy.com
Subject: NY SHPO: Requested Submission DYVVS2819XK Received for Consultation Project 22PR05554
Date: Friday, January 5, 2024 3:48:15 PM

[EXTERNAL SENDER]

Requested Submission Received

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

Requested Submission Token: DYVVS2819XK

Project Number: 22PR05554

Project Type: Consultation

Project Name: North Seneca Solar Project/105 MW/1909 Acres

Consolidated Response Token: 5NKXS23YX8AG

Previous Submission Number: 22PR05554.004

Open Request: Phase IB archaeological survey requested

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

New York State Historic Preservation Office

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

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

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

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

Who sent this email?

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

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

Why did I receive this email?

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

What do I need to do?

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

What will happen next?

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

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

What else can I do?

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

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

Where can I get help?

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

If you still have questions about CRIS, please contact CRIS Help at CRISHelp@parks.ny.gov.

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



To: Chief Sam George, Cayuga Nation
Mr. Clint Halftown, Cayuga Nation
Chief Roger Hill, Tonawanda Seneca Nation
Dr. Joseph Stahlman, Seneca Nation of Indians

From: Andrea Zlotucha Kozub
Environmental Design & Research, Landscape Architecture, Engineering, &
Environmental Services, D.P.C. (EDR)

Date: January 8, 2024

Reference: North Seneca Solar Project
Notification of Phase IB Archaeological Survey Report

NYSHPO Project No: 22PR05554

I am writing on behalf of North Seneca Solar Project, LLC to provide the Cayuga Nation, Seneca Nation of Indians, and Tonawanda Seneca Nation with the Phase IB Archaeology Survey Report for the proposed North Seneca Solar Project. This solar energy Facility will be built within approximately 940 acres of land in the Towns of Junius and Waterloo, Seneca County, New York.

For your reference, North Seneca Solar Project, LLC's point of contact for the project is:

Courtney Dohoney
Senior Director, Permitting & Environmental
Savion, LLC
422 Admiral Blvd.
Kansas City, MO 64106
Email: cdohoney@savionenergy.com
Phone: 312-636-6848

The Phase IB report was submitted to the New York State Historic Preservation Office (NYSHPO) on January 5, 2024 and is available at the link below. A Siting Permit Application is expected to be filed with the Office of Renewable Energy Siting (ORES) later this winter.

[2024-01-05 North Seneca Solar Phase IB Archaeological Survey Report.pdf](#)

Please provide any cultural resource comments to Kristy Primeau (ORES) at the below address and copy Bradley Russell (NYSHPO, see below).

Kristy E. Primeau, Ph.D., RPA
Agency Preservation Officer, Renewable Energy Siting Specialist 3
Office of Renewable Energy Siting
W.A. Harriman Campus – Building 9
1200 Washington Avenue
Albany, NY 12226
kristy.primeau@ores.ny.gov

We sincerely appreciate the opportunity to work with you on this project. If you have any questions or require additional information, please contact me at azlotuchakozub@edrdpc.com or 315-246-5384.

Sincerely,



Andrea Zlotucha Kozub
EDR Project Manager, Cultural Resources

Copies to:

- Rickey Armstrong (Seneca Nation of Indians) – rick.armstrong@sni.org
- Alexandra Page (Attorney) – alex.c.page@gmail.com
- Bradley Russell (NYSHPO) – bradley.russell@parks.ny.gov



**New York State
Parks, Recreation and
Historic Preservation**

KATHY HOCHUL
Governor

ERIK KULLESEID
Commissioner

January 29, 2024

Kristy Primeau
Agency Preservation Officer
Office of Renewable Energy Siting
1200 Washington Avenue, Building 9
Albany, NY 12226

Re: ORES
North Seneca Solar Project/105 MW/1909 Acres
22PR05554

Dear Kristy Primeau:

Thank you for requesting the comments of the Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted materials in accordance with the New York State Historic Preservation Act of 1980 (Section 14.09 of the New York State Parks, Recreation and Historic Preservation Law). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources. Such impacts must be considered as part of the environmental review of the project pursuant to Executive Law Section 94-c and its implementing regulations (19 NYCRR Part 900).

We have reviewed the submission received on January 5, 2024, including the Historic Resources Survey Report and Effects Assessment dated January 2024, and the Visual Outreach Letter dated October 12, 2023. In order to continue our review and assessment of historic resources, we request submission of Exhibits 8 & 9 once they become available.

If you have any questions, you can call or e-mail me at the contact information below.

Sincerely,

Robyn Sedgwick
Historic Site Restoration Coordinator
e-mail: robyn.sedgwick@parks.ny.gov

cc: J. Betsworth – ORES
CRIS List



**New York State
Parks, Recreation and
Historic Preservation**

KATHY HOCHUL
Governor

ERIK KULLESEID
Commissioner

February 2, 2024

Kristy Primeau
Agency Preservation Officer
Office of Renewable Energy Siting
1200 Washington Avenue, Building 9
Albany, NY 12226

Re: ORES
North Seneca Solar Project/105 MW/1909 Acres
22PR05554

Dear Kristy Primeau:

Thank you for requesting the comments of the Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted materials in accordance with the New York State Historic Preservation Act of 1980 (section 14.09 of the New York Parks, Recreation and Historic Preservation Law). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project.

OPRHP has reviewed the Phase IB archaeological survey report for the North Seneca Solar Project/105 MW/1909 Acres Project (22PR05554) prepared by the Environmental Design & Research, D.P.C. (EDR), Consulting Archaeologists (January 2024; 24SR00015). We note that nine archaeological sites were identified:

- █ [REDACTED]
- █ [REDACTED]
- █ [REDACTED]
- █ [REDACTED]
- █ [REDACTED]
- █ [REDACTED]
- █ [REDACTED]
- █ [REDACTED]
- █ [REDACTED]

[REDACTED] has been determined Not Eligible for inclusion in the National Register of Historic Places. OPRHP concurs with the report recommendation that no further archaeological investigation is warranted. OPRHP further concurs with the report recommendation that the remaining identified archaeological sites should be avoided. If avoidance is not feasible, a Phase II archaeological investigation is recommended to determine National Register Eligibility and establish site boundaries.

The submitted report indicates that, “The Applicant has designed the Facility layout to avoid including archaeological sites within the LSGD. Construction techniques such as horizontal directional drilling and grading modifications were implemented to avoid significant ground disturbance within all eight sites recommended for avoidance.” OPRHP requests the submission of a formal avoidance plan.

If you have any questions, I can be reached at Bradley.Russell@parks.ny.gov.

Sincerely,

A handwritten signature in black ink that reads "Brad Russell". The signature is written in a cursive, slightly slanted style.

Bradley W. Russell, Ph.D.

Historic Preservation Specialist - Archaeology

From: [Sam George](#)
To: [Andrea Zlotucha Kozub](#)
Cc: [Clint Halftown](#); joe.stahlman@sni.org; tonseneca@aol.com; [President Rick Armstrong](#); Kristy.Primeau@ores.ny.gov; Bradley.Russell@parks.ny.gov; alex.c.page@gmail.com; [Courtney Dohoney](#); [Camille Kaynor](#); [William Whipps](#); [Laurie Reynolds](#)
Subject: Re: North Seneca Solar Project
Date: Monday, February 26, 2024 5:46:44 PM

You don't often get email from sevenclansam@gmail.com. [Learn why this is important](#)

[EXTERNAL SENDER]

Thank you for the information.

On Mon, Feb 26, 2024 at 1:21 PM Andrea Zlotucha Kozub <azlotuchakozub@edrdpc.com> wrote:

Hello,

On behalf of Savion, LLC and the North Seneca Solar Project, LLC, EDR is presenting you with an Archaeological Avoidance Plan for the proposed North Seneca Solar Project located in the Towns of Waterloo and Junius. Please let me know if you have any difficulties opening the attached document.

Please direct any questions to Kris Primeau (ORES) and Bradley Russell (NYSHPO). I also welcome any questions you may have about the report.

Respectfully yours,

Andrea

Andrea Zlotucha Kozub

EDR Cultural Resources Project Manager

217 Montgomery Street, Suite 1100, Syracuse, New York 13202

O: 315.471.0688 x655 M: 315.246.5384 www.edrdpc.com

EDR a **better** environment



Letter of Transmittal

To: New York State Office of Parks, Recreation and Historic Preservation (NYSHPO)
Nancy Herter, Director, Technical Preservation Bureau

From: Andrea Zlotucha Kozub (EDR)

Date: March 5, 2024

Reference: North Seneca Solar Project
NYSHPO Project Number 22PR05554

We are sending: Exhibit 8 and 9, Section 94-c Application

Sent Via: NYSHPO Cultural Resource Information System

On behalf of North Seneca Solar Project, LLC (the Applicant), EDR is submitting the attached Exhibits 8 (Visual Impacts) and 9 (Cultural Resources) of the Section 94-c Application for the proposed North Seneca Solar Project (the Facility). The full Application is available on the Office of Renewable Energy Siting (ORES) website under Matter No. 23-00036: [Permit Application Master \(ny.gov\)](https://www.oredpc.com/PermitApplicationMaster)

This comprehensive submission includes:

- Exhibit 8: Visual Impacts
- Appendix 8-A: Visual Impact Assessment
- Appendix 8-B: Visual Impact Minimization and Mitigation Plan
- Exhibit 9: Cultural Resources
- Appendix 9-A: Cultural Resources Correspondence
- Appendix 9-B: Phase IA Archaeology Survey
- Appendix 9-C: Phase IA Historic Resources Survey Methodology
- Appendix 9-D: Historic Resources Survey Report
- Appendix 9-E: Phase IB Archaeological Survey Report (Public)
- Appendix 9-F: Archaeological Avoidance Plan (Public)
- Appendix 9-G: Unanticipated Discovery Protocol

The information included is intended to assist ORES and the New York State Office of Parks, Recreation and Historic Preservation (NYSHPO) and other New York state and/or federal agencies in their review of the Facility under Section 94-c of the New York State Executive Law, Section 14.09 of the New York State Parks, Recreation, and Historic Preservation Law, and/or Section 106 of the National Historic Preservation Act, as applicable.

March 5, 2024

The Applicant and EDR appreciate the opportunity to submit these exhibits to the NYSHPO. Please contact me at azlotuchakozub@edrdpc.com or 315-246-5384 or Kristen Olsen at kolson@edrdpc.com if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to be the initials 'AZ' followed by a flourish.

EDR Cultural Resources Project Manager

From: [Joe Stahlman](#)
To: [Andrea Zlotucha Kozub](#); sevenclansam@gmail.com; [Clint Halftown](#); tonseneca@aol.com
Cc: [President Rick Armstrong](#); Kristy.Primeau@ores.ny.gov; Bradley.Russell@parks.ny.gov; alex.c.page@gmail.com; [Courtney Dohoney](#); [Camille Kaynor](#); [William Whipps](#); [Laurie Reynolds](#)
Subject: RE: North Seneca Solar Project
Date: Wednesday, March 13, 2024 10:10:43 AM
Attachments: [image001.jpg](#)
[image002.png](#)

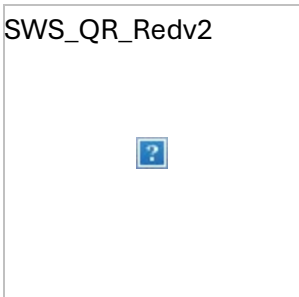
[EXTERNAL SENDER]

Hi Andrea,
Seneca Nation THPO has reviewed the Avoidance Plan for the North Seneca Solar Project. We have no further comments.

Thank you,

Joe

Dr. Joe Stahlman
Tribal Historic Preservation Office
Seneca Nation
82 W. Hetzel Street
Salamanca, NY 14779
Phone (716) 945-1760
Joe.Stahlman@sni.org



From: Andrea Zlotucha Kozub <azlotuchakozub@edrdpc.com>
Sent: Monday, February 26, 2024 1:21 PM
To: sevenclansam@gmail.com; Clint Halftown <chalftown@gocayuga.com>; Joe Stahlman <joe.stahlman@sni.org>; tonseneca@aol.com
Cc: President Rick Armstrong <rick.armstrong@sni.org>; Kristy.Primeau@ores.ny.gov; Bradley.Russell@parks.ny.gov; alex.c.page@gmail.com; Courtney Dohoney <cdohoney@savionenergy.com>; Camille Kaynor <ckaynor@savionenergy.com>; William Whipps <wwhipps@edrdpc.com>; Laurie Reynolds <lreynolds@edrdpc.com>
Subject: North Seneca Solar Project

Some people who received this message don't often get email from azlotuchakozub@edrdpc.com. [Learn why this is important](#)

Hello,

On behalf of Savion, LLC and the North Seneca Solar Project, LLC, EDR is presenting you with an Archaeological Avoidance Plan for the proposed North Seneca Solar Project located in the Towns of Waterloo and Junius. Please let me know if you have any difficulties opening the attached document.

Please direct any questions to Kris Primeau (ORES) and Bradley Russell (NYSHPO). I also welcome any questions you may have about the report.

Respectfully yours,

Andrea

Andrea Zlotucha Kozub

EDR Cultural Resources Project Manager
217 Montgomery Street, Suite 1100, Syracuse, New York 13202
O: 315.471.0688 x655 M: 315.246.5384 www.edrdpc.com

EDR a **better** environment

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

From: [Clint Halftown](#)
To: [Andrea Zlotucha Kozub](#)
Cc: [sevensclansam@gmail.com](#); [joe.stahman@sni.org](#); [tonseneca@aol.com](#); [President Rick Armstrong](#); [kristy.primeau@ores.ny.gov](#); [bradley.russell@parks.ny.gov](#); [alex.c.page@gmail.com](#); [Courtney Dohoney](#); [Camille Kaynor](#); [William Whipps](#); [Laurie Reynolds](#)
Subject: Re: North Seneca Solar Project
Date: Thursday, March 14, 2024 12:00:55 AM

[EXTERNAL SENDER]

Andrea,

The Cayuga Nation does not object to the proposed project.

Oneh,

Clint Halftown
Cayuga Nation
Sent from my iPhone

On Feb 26, 2024, at 10:21 AM, Andrea Zlotucha Kozub
<azlotuchakozub@edrdpc.com> wrote:

Hello,

On behalf of Savion, LLC and the North Seneca Solar Project, LLC, EDR is presenting you with an Archaeological Avoidance Plan for the proposed North Seneca Solar Project located in the Towns of Waterloo and Junius. Please let me know if you have any difficulties opening the attached document.

Please direct any questions to Kris Primeau (ORES) and Bradley Russell (NYSHPO). I also welcome any questions you may have about the report.

Respectfully yours,

Andrea

Andrea Zlotucha Kozub

EDR Cultural Resources Project Manager
217 Montgomery Street, Suite 1100, Syracuse, New York 13202
O: 315.471.0688 x655 **M:** 315.246.5384 www.edrdpc.com

EDR a **better** environment

<2024-02-26_North Seneca Solar_Archaeological Avoidance Plan.pdf>



**New York State
Parks, Recreation and
Historic Preservation**

KATHY HOCHUL
Governor

RANDY SIMONS
Commissioner *Pro Tempore*

March 25, 2024

Kristy Primeau
Agency Preservation Officer
Office of Renewable Energy Siting
1200 Washington Avenue, Building 9
Albany, NY 12226

Re: ORES
North Seneca Solar Project/105 MW/1909 Acres
22PR05554

Dear Kristy Primeau:

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

OPRHP has reviewed the Avoidance Plan document entitled "Archaeological Avoidance Plan North Seneca Solar Project Towns of Junius and Waterloo, Seneca County, New York NYSHPO Project Review Number: 22PR0554" prepared by Environmental Design & Research, D.P.C. (February 2024). OPRHP concurs with the archaeological site avoidance measures outlined in this Plan.

Please note that the project remains under review by Robyn Sedgwick of our Technical Services Unit.

If you have any questions, I can be reached at Bradley.Russell@parks.ny.gov.

Sincerely,

A handwritten signature in black ink that reads "Brad Russell".

Bradley W, Russell
Historic Preservation Specialist - Archaeology



KATHY HOCHUL
Governor

ERIK KULLESEID
Commissioner

April 12, 2024

Kristy Primeau
Agency Preservation Officer
Office of Renewable Energy Siting
1200 Washington Avenue, Building 9
Albany, NY 12226

Re: ORES
North Seneca Solar Project/105 MW/1909 Acres
22PR05554

Dear Kristy Primeau:

Thank you for your continued consultation with the Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted materials in accordance with the New York State Historic Preservation Act of 1980 (Section 14.09 of the New York State Parks, Recreation and Historic Preservation Law). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources. Such impacts must be considered as part of the environmental review of the project pursuant to Executive Law Section 94-c and its implementing regulations (19 NYCRR Part 900).

We note that there are ten historic resources eligible for listing in the State and National Registers of Historic Places within the Zone of Visual Impact. Please see Appendix A for a complete list of historic resources. We have reviewed the submission received on March 5, 2024, including Exhibits 8 & 9. Based on that review, it is the OPRHP's opinion that the project, as proposed, will have an Adverse Impact on historic resources.

At this time, we have concluded our evaluation of eligible resources and the potential impacts to those resources resulting from this project. In order to move the project forward, the applicant should begin to develop a mitigation plan. We appreciate the effort to mitigate the visual impacts via vegetative buffers, however, we note that in some instances a vegetative buffer separates the historic resource from its agricultural fields/setting and is therefore not always appropriate mitigation. Retaining the connection between the agricultural field/landscape and the historic resource allows for the setting to continue to be read despite the addition of solar panels. We request that the proposed vegetative buffers be removed from the following locations:

- North and east sides of panel across from Farmstead at 1831 Whiskey Hill Road.
- South side of panels across from Bowdish-Dean House.

We recommend reaching out to a variety of history-based organizations within the impacted communities. The plan should establish specific preservation/history projects and/or funding

intended to offset what this office believes will be significant visual impacts associated with this undertaking. Once a mitigation plan is developed and agreed upon, it will be memorialized and outlined in §900-2.10 Exhibit 9 Revised, and included in the final Cultural Resource Avoidance, Minimization and Mitigation Plan (CRAMMP) submitted to the Office of Renewable Energy Siting for review and approval in compliance with 19 NYCRR §§ 900-10.1(a) and 900-10.2(g).

If you have any questions, you can call or e-mail me at the contact information below.

Sincerely,



Robyn Sedgwick
Historic Site Restoration Coordinator
e-mail: robyn.sedgwick@parks.ny.gov

Division for Historic Preservation

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

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

Appendix A

1641 Whiskey Hill Road	Junius	Eligible
Bowdish Cemetery	Waterloo	Eligible
Bowdish-Dean House	Waterloo	Eligible
1130 Route 96	Waterloo	Eligible
1831 Whiskey Hill Road	Waterloo	Eligible
1067 Route 96	Waterloo	Eligible
Hubbard Cemetery	Waterloo	Eligible
Quaker Cemetery	Waterloo	Eligible
Dunham Family Cemetery	Waterloo	Eligible
1329 Nine Foot Road	Junius	Eligible

Division for Historic Preservation

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

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

From: [Sedgwick, Robyn M \(PARKS\)](#)
To: [Grant Johnson](#); [Kristen Olson](#)
Subject: RE: 22PR05554 - North Seneca Solar Project
Date: Friday, May 24, 2024 11:36:42 AM
Attachments: [image001.png](#)

[EXTERNAL SENDER]

Good morning Grant,

I just had a meeting with ORES. I have no concerns with the use of module 4 in the areas where I previously requested the removal of vegetative screening. As module 4 has already been approved by all other parties involved in the project, this appears to be the best route for all. Feel free to let me know if you have any questions or concerns.

Best,

Robyn

Robyn Sedgwick

Historic Site Restoration Coordinator

New York State Parks, Recreation & Historic Preservation

Division for Historic Preservation

Peebles Island Resource Center

518-268-2170

robyn.sedgwick@parks.ny.gov

www.parks.ny.gov

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



From: Grant Johnson <GJohnson@edrdpc.com>

Sent: Wednesday, May 22, 2024 2:06 PM

To: Sedgwick, Robyn M (PARKS) <Robyn.Sedgwick@parks.ny.gov>; Kristen Olson <kolson@edrdpc.com>

Subject: RE: 22PR05554 - North Seneca Solar Project

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Hi Robyn,
No worries! Thank you for the response and please keep us posted once you hear from ORES.

Thank you,
Grant

Grant Johnson

EDR Historic Preservation Services Leader

M: 315.530.3865 www.edrdpc.com

From: Sedgwick, Robyn M (PARKS) <Robyn.Sedgwick@parks.ny.gov>

Sent: Wednesday, May 22, 2024 2:04 PM

To: Grant Johnson <GJohnson@edrdpc.com>; Kristen Olson <kolson@edrdpc.com>

Subject: RE: 22PR05554 - North Seneca Solar Project

[EXTERNAL SENDER]

Hi Grant,

Thank you for your email and I apologize for not getting back to you sooner. I have reached out to ORES to ensure that any information I share is correct. I'll get back to you as soon as I hear back.

Best,

Robyn

Robyn Sedgwick

Historic Site Restoration Coordinator

New York State Parks, Recreation & Historic Preservation

Division for Historic Preservation

Peebles Island Resource Center

518-268-2170

robyn.sedgwick@parks.ny.gov

www.parks.ny.gov

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



From: Grant Johnson <GJohnson@edrdpc.com>

Sent: Tuesday, May 21, 2024 11:37 AM

To: Sedgwick, Robyn M (PARKS) <Robyn.Sedgwick@parks.ny.gov>; Kristen Olson <kolson@edrdpc.com>

Subject: RE: 22PR05554 - North Seneca Solar Project

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Hi Robyn,

Following up on our call on April 26th about this project and the discussion regarding screening. I believe you mentioned you had a call scheduled with ORES the following week where this issue might be discussed. We received a Notice of Incomplete Application from ORES for the project and they did not mention anything regarding screening for this particular project, but I would be curious to know if they have general thoughts or concerns we should be taking into consideration for this or future projects and assessments. Are you able to share any relevant information from that call?

Thank you,
Grant

Grant Johnson

EDR Historic Preservation Services Leader

M: 315.530.3865 www.edrdpc.com

From: Sedgwick, Robyn M (PARKS) <Robyn.Sedgwick@parks.ny.gov>

Sent: Wednesday, April 24, 2024 1:07 PM

To: Kristen Olson <kolson@edrdpc.com>

Cc: Grant Johnson <GJohnson@edrdpc.com>

Subject: RE: 22PR05554 - North Seneca Solar Project

[EXTERNAL SENDER]

Good afternoon Kristen,

It was good seeing you, too! I will be in a training all day tomorrow but I am free Friday from 7:30 to 3:30.

Best,

Robyn

Robyn Sedgwick

Historic Site Restoration Coordinator

New York State Parks, Recreation & Historic Preservation

Division for Historic Preservation

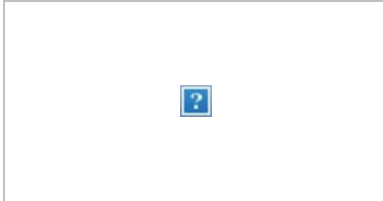
Peebles Island Resource Center

518-268-2170

robyn.sedgwick@parks.ny.gov

www.parks.ny.gov

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



From: Kristen Olson <kolson@edrdpc.com>

Sent: Thursday, April 18, 2024 1:57 PM

To: Sedgwick, Robyn M (PARKS) <Robyn.Sedgwick@parks.ny.gov>

Cc: Grant Johnson <GJohnson@edrdpc.com>

Subject: 22PR05554 - North Seneca Solar Project

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Good afternoon, Robyn,

It was good to see you and your colleagues at the conference this week!

Thanks for your comments on the North Seneca Solar historic resources survey and Exhibits 8 & 9. The request to remove mitigation plantings is new for us and for the project developer. I'm hoping we can discuss this further with you, so that we can better understand when and where plantings can best be deployed. Would you be available for a virtual meeting late next week (Wednesday, 4/24 to Friday, 4/26) or the following week? We would like to include a couple of folks from the developer team as well as someone from EDR's Visual team.

Thanks,

Kristen

Kristen Olson

EDR Historic Preservation Project Manager
217 Montgomery Street, Suite 1100, Syracuse, New York 13202
O: 315.471.0688 x688 www.edrdpc.com

EDR a **better** environment



Memorandum

To: Bradley W. Russell
Historic Preservation Specialist, Archaeology
New York State Historic Preservation Office

From: Andrea Zlotucha Kozub, RPA
Project Manager, Cultural Resources
Environmental Design & Research, D.P.C.

Date: July 24, 2024

Reference: North Seneca Solar Project
22PR05554
Matter No. 23-00036
Revised Facility Layout

On behalf of North Seneca Solar Project, LLC (the Applicant), EDR conducted a supplemental Phase IB archaeological survey for the North Seneca Solar Project (the Facility) located in the Towns of Junius and Waterloo in Seneca County, New York. The purpose of this memorandum is to document the results of a supplemental survey conducted in response to proposed revisions to the Facility design (i.e., the layout).

The work was conducted in accordance with the New York Archaeological Council's *Standards for Cultural Resources Investigations and the Curation of Archaeological Collections in New York State* (NYAC, 1994) and the New York State Historic Preservation Office's (NYSHPO) *Phase I Archaeological Report Format Requirements*, as appropriate (NYSHPO, 2005).

Consultation with NYSHPO since completion of the Phase IB archaeological survey has included:

- Submission of a *Phase IB Archaeological Survey* report on January 5, 2024 (EDR, 2024a). On February 2, 2024, NYSHPO concurred with EDR's recommendations and requested an archaeological site avoidance plan (NYSHPO, 2024a).
- Submission of an *Archaeological Avoidance Plan* on February 26, 2024 (EDR, 2024b) detailing how archaeological sites would be avoided by significant ground disturbance. On March 25, 2024, NYSHPO concurred with EDR's avoidance measures (NYSHPO, 2024b).

Subsequent to this correspondence with NYSHPO, the Applicant decided to investigate a layout modification for the Facility's substation and associated infrastructure, which would change the Limits of Significant Ground Disturbance (LSGD). EDR identified and tested 5.8 acres of previously

untested elevated archaeological sensitivity within the potential LSGD to provide the Applicant with flexibility in the siting of the substation and associated infrastructure.

EDR archaeologists conducted a supplemental Phase IB archaeological survey at this location from June 17-19, 2024. The supplemental survey area consisted of newly germinated corn fields and a fallow field with successional vegetation. Phase IB testing included a pedestrian survey of 2.6 acres within the corn fields and the excavation of 70 shovel test pits at 15-meter intervals within the fallow field. Areas of steep slope and existing utility corridors tested by previous archaeological surveys (C&A, 1990; E&A, 1999) were excluded from testing. Soils encountered during shovel testing typically consisted of a dark grayish brown (10YR 4/2) or brown (10YR 4/3) silt loam or silty clay loam plowzone overlying a variable, often oxidized, subsoil ranging from a light yellowish brown (10YR 6/4) to brown (7.5YR 5/3; 7.5YR 5/4) sandy loam, silty clay loam, or silty clay. No cultural materials were encountered during the supplemental Phase IB archaeological survey and no archaeological sites were identified. Mapping and photographs of the supplemental survey area are provided in Attachments A and B.

Based on these results, no previously unrecorded archaeological resources will be impacted by proposed revisions to the Facility layout in this location. EDR recommends no further archaeological testing is warranted for this part of the Facility Site.

If you have any questions or would like to discuss the information described herein, please contact me at azlotuchakozub@edrdpc.com or (315) 246-5384.

Sincerely,



Andrea Zlotucha Kozub
Project Manager, Cultural Resources
Environmental Design & Research, D.P.C.

Attachments

- Attachment A: Results of Supplemental Phase IB Archaeological Survey
- Attachment B: Photographs

References

Environment & Archaeology, LLC (E&A). 1999. *Stage IA and IB Archeology Report for Tennessee Gas Pipeline's 23 Mile Section 237 of the EEP 2000 Project, Mileposts 237-3+0.00 to 238-2+10.00, in Ontario, Seneca and Cayuga Counties*. Report prepared for the Federal Energy Regulatory Commission (FERC) by E&A, Florence, KY.

Environmental Design & Research, D.P.C. (EDR). 2024a. *Phase IB Archaeological Survey, North Seneca Solar Project, Towns of Junius and Waterloo, Seneca County, New York*. Prepared for North Seneca Solar Project, LLC by EDR, Syracuse, NY. January 5, 2024.

EDR. 2024b. *North Seneca Solar Project, Archaeological Avoidance Plan*. Prepared for North Seneca Solar Project, LLC by EDR, Syracuse, NY. February 26, 2024.

Collamer & Associates, Inc. (C&A). 1990. *MCI Telecommunications Corporation Lightwave System Fiber Optics Cable Route, Cultural Resources Survey, Volume I, Multiple Counties*. Report prepared for the Federal Communications Commission (FCC) by C&A, Albany, NY.

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

New York State Historic Preservation Office (NYSHPO). 2005. *New York State Historic Preservation Office Phase I Archaeological Report Format Requirements*. On file, New York State Office of Parks, Recreation & Historic Preservation, Waterford, NY.

NYSHPO. 2024a. Re: ORES, North Seneca Solar Project/105 MW/1909 Acres, 22PR05554. Review correspondence from Bradley W. Russell (NYSHPO) to Kristy Primeau (ORES). NYSHPO, Waterford, NY. Via CRIS, February 2, 2024.

NYSHPO. 2024b. Re: ORES, North Seneca Solar Project/105 MW/1909 Acres, 22PR05554. Review correspondence from Bradley W. Russell (NYSHPO) to Kristy Primeau (ORES). NYSHPO, Waterford, NY. Via CRIS, March 25, 2024.

This document contains critical infrastructure information, confidential commercial information, trade secrets, and/or proprietary information and as such is entitled to confidential treatment under Section 87(2) of the New York State Public Officers Law and the Commission's regulations (16 NYCRR 6-1). An unredacted version of this document has been submitted under separate cover pursuant to 16 NYCRR 6-1.4.

This document contains critical infrastructure information, confidential commercial information, trade secrets, and/or proprietary information and as such is entitled to confidential treatment under Section 87(2) of the New York State Public Officers Law and the Commission's regulations (16 NYCRR 6-1). An unredacted version of this document has been submitted under separate cover pursuant to 16 NYCRR 6-1.4.

Attachment B. Photographs

Photograph 1

Representative view of corn field submitted to pedestrian survey.
View to the east.



Photograph 2

Representative view of fallow field submitted to shovel testing.
View to the west.



North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

Supplemental Phase IB Archaeological Survey



July 29, 2024

Chief Sam George
Cayuga Nation Council
Cayuga Nation
P.O. Box 433
Union Springs, NY 13160

Email: sevenclansam@gmail.com

**RE: North Seneca Solar Project
Towns of Junius and Waterloo, Seneca County, New York
Supplemental Phase IB Archaeological Survey**

Dear Chief George:

On behalf of North Seneca Solar Project, LLC (the Applicant), EDR conducted a supplemental Phase IB archaeological survey for the proposed North Seneca Solar Project (the Facility) located in the Towns of Junius and Waterloo in Seneca County, New York. The previous Phase IB archaeological survey conducted for the Facility was approved by the New York State Historic Preservation Office (NYSHPO) in a letter dated February 2, 2024.

Subsequent to this correspondence with NYSHPO, the Applicant decided to investigate a layout modification for the Facility's substation and associated infrastructure that would change the Limits of Significant Ground Disturbance (LSGD). A supplemental Phase IB archaeological survey was conducted across areas of untested elevated archaeological sensitivity within the potential LSGD (i.e., the Supplemental Phase IB Survey Area). No cultural materials were encountered during the survey and no archaeological sites were identified. These results were documented in the attached memorandum, which was provided to the NYSHPO on July 24, 2024.

Please provide any cultural resource comments to Kristy E. Primeau of the Office of Renewable Energy Siting (ORES) and copy Bradley W. Russell (NYSHPO). Their addresses are provided below.

Kristy E. Primeau, Ph.D., RPA
Agency Preservation Officer,
Renewable Energy Siting Specialist 3
Office of Renewable Energy Siting
W.A. Harriman Campus – Building 9
1200 Washington Avenue
Albany, NY 12226
kristy.primeau@ores.ny.gov

Bradley W. Russell, Ph.D.
Historic Preservation Specialist - Archaeology
New York Office of Parks, Recreation & Historic
Preservation
Division for Historic Preservation
OPRHP, PO Box 189
Waterford, NY 12188
Bradley.russell@parks.ny.gov

We sincerely appreciate the opportunity to work with you on this project. If you have any questions or require additional information, please contact me at azlotuchakozub@edrdpc.com or (315) 246-5384. We are confident the North Seneca Solar Project is being developed in a manner that is respectful and mindful of the Cayuga Nation's heritage.

Sincerely,



Andrea Zlotucha Kozub, RPA
EDR Project Manager, Cultural Resources

Enclosure:

- Supplemental Phase IB Archaeological Survey Memorandum

Copies to:

- Kristy Primeau (ORES) - kristy.primeau@ores.ny.gov
- Jennifer Betsworth (ORES) - jennifer.betsworth@ores.ny.gov
- Bradley Russell (NYSHPO) - bradley.russell@parks.ny.gov
- Clint Halftown (Cayuga Nation) - chalftown@gocayuga.com
- Lee Alcott (Cayuga Nation Attorney) - lalcott@barclaydamon.com
- Rickey L. Armstrong (Seneca Nation of Indians) - rick.armstrong@sni.org
- Charisse Ground (Seneca Nation of Indians) - c.ground@sni.org
- Chief Roger Hill (Tonawanda Seneca Nation)- tonseneca@aol.com
- Alex Page (Tonawanda Seneca Nation Attorney) – alex.c.page@gmail.com



July 29, 2024

Clint Halftown
Nation Representative
Cayuga Nation
P.O. Box 803
Seneca Falls, NY 13148

Email: chalftown@gocayuga.com

**RE: North Seneca Solar Project
Towns of Junius and Waterloo, Seneca County, New York
Supplemental Phase IB Archaeological Survey**

Dear Mr. Halftown:

On behalf of North Seneca Solar Project, LLC (the Applicant), EDR conducted a supplemental Phase IB archaeological survey for the proposed North Seneca Solar Project (the Facility) located in the Towns of Junius and Waterloo in Seneca County, New York. The previous Phase IB archaeological survey conducted for the Facility was approved by the New York State Historic Preservation Office (NYSHPO) in a letter dated February 2, 2024.

Subsequent to this correspondence with NYSHPO, the Applicant decided to investigate a layout modification for the Facility's substation and associated infrastructure that would change the Limits of Significant Ground Disturbance (LSGD). A supplemental Phase IB archaeological survey was conducted across areas of untested elevated archaeological sensitivity within the potential LSGD (i.e., the Supplemental Phase IB Survey Area). No cultural materials were encountered during the survey and no archaeological sites were identified. These results were documented in the attached memorandum, which was provided to the NYSHPO on July 24, 2024.

Please provide any cultural resource comments to Kristy E. Primeau of the Office of Renewable Energy Siting (ORES) and copy Bradley W. Russell (NYSHPO). Their addresses are provided below.

Kristy E. Primeau, Ph.D., RPA
Agency Preservation Officer,
Renewable Energy Siting Specialist 3
Office of Renewable Energy Siting
W.A. Harriman Campus – Building 9
1200 Washington Avenue
Albany, NY 12226
kristy.primeau@ores.ny.gov

Bradley W. Russell, Ph.D.
Historic Preservation Specialist - Archaeology
New York Office of Parks, Recreation & Historic
Preservation
Division for Historic Preservation
OPRHP, PO Box 189
Waterford, NY 12188
Bradley.russell@parks.ny.gov

We sincerely appreciate the opportunity to work with you on this project. If you have any questions or require additional information, please contact me at azlotuchakozub@edrdpc.com or (315) 246-5384. We are confident the North Seneca Solar Project is being developed in a manner that is respectful and mindful of the Cayuga Nation's heritage.

Sincerely,



Andrea Zlotucha Kozub, RPA
EDR Project Manager, Cultural Resources

Enclosure:

- Supplemental Phase IB Archaeological Survey Memorandum

Copies to:

- Kristy Primeau (ORES) - kristy.primeau@ores.ny.gov
- Jennifer Betsworth (ORES) - jennifer.betsworth@ores.ny.gov
- Bradley Russell (NYSHPO) - bradley.russell@parks.ny.gov
- Chief Sam George (Cayuga Nation) - sevenclansam@gmail.com
- Lee Alcott (Cayuga Nation Attorney) - lalcott@barclaydamon.com
- Rickey L. Armstrong (Seneca Nation of Indians) - rick.armstrong@sni.org
- Charisse Ground (Seneca Nation of Indians) - c.ground@sni.org
- Chief Roger Hill (Tonawanda Seneca Nation)- tonseneca@aol.com
- Alex Page (Tonawanda Seneca Nation Attorney) – alex.c.page@gmail.com



July 29, 2024

Rickey L. Armstrong, Sr.
President
Seneca Nation of Indians
90 Ohi:yo' Way
Salamanca, NY 14779

Email: rick.armstrong@sni.org

**RE: North Seneca Solar Project
Towns of Junius and Waterloo, Seneca County, New York
Supplemental Phase IB Archaeological Survey**

Dear Mr. Armstrong:

On behalf of North Seneca Solar Project, LLC (the Applicant), EDR conducted a supplemental Phase IB archaeological survey for the proposed North Seneca Solar Project (the Facility) located in the Towns of Junius and Waterloo in Seneca County, New York. The previous Phase IB archaeological survey conducted for the Facility was approved by the New York State Historic Preservation Office (NYSHPO) in a letter dated February 2, 2024.

Subsequent to this correspondence with NYSHPO, the Applicant decided to investigate a layout modification for the Facility's substation and associated infrastructure that would change the Limits of Significant Ground Disturbance (LSGD). A supplemental Phase IB archaeological survey was conducted across areas of untested elevated archaeological sensitivity within the potential LSGD (i.e., the Supplemental Phase IB Survey Area). No cultural materials were encountered during the survey and no archaeological sites were identified. These results were documented in the attached memorandum, which was provided to the NYSHPO on July 24, 2024.

Please provide any cultural resource comments to Kristy E. Primeau of the Office of Renewable Energy Siting (ORES) and copy Bradley W. Russell (NYSHPO). Their addresses are provided below.

Kristy E. Primeau, Ph.D., RPA
Agency Preservation Officer,
Renewable Energy Siting Specialist 3
Office of Renewable Energy Siting
W.A. Harriman Campus – Building 9
1200 Washington Avenue
Albany, NY 12226
kristy.primeau@ores.ny.gov

Bradley W. Russell, Ph.D.
Historic Preservation Specialist - Archaeology
New York Office of Parks, Recreation & Historic
Preservation
Division for Historic Preservation
OPRHP, PO Box 189
Waterford, NY 12188
Bradley.russell@parks.ny.gov

We sincerely appreciate the opportunity to work with you on this project. If you have any questions or require additional information, please contact me at azlotuchakozub@edrdpc.com or (315) 246-5384. We are confident the North Seneca Solar Project is being developed in a manner that is respectful and mindful of the Seneca Nation of Indians' heritage.

Sincerely,



Andrea Zlotucha Kozub, RPA
EDR Project Manager, Cultural Resources

Enclosure:

- Supplemental Phase IB Archaeological Survey Memorandum

Copies to:

- Kristy Primeau (ORES) - kristy.primeau@ores.ny.gov
- Jennifer Betsworth (ORES) - jennifer.betsworth@ores.ny.gov
- Bradley Russell (NYSHPO) - bradley.russell@parks.ny.gov
- Charisse Ground (Seneca Nation of Indians) - c.ground@sni.org
- Chief Sam George (Cayuga Nation) - sevenclansam@gmail.com
- Clint Halftown (Cayuga Nation) - chalftown@gocayuga.com
- Lee Alcott (Cayuga Nation Attorney) - lalcott@barclaydamon.com
- Chief Roger Hill (Tonawanda Seneca Nation) - toseneca@aol.com
- Alex Page (Tonawanda Seneca Nation Attorney) - alex.c.page@gmail.com



July 29, 2024

Chief Roger Hill
Tonawanda Seneca Nation
7027 Meadville Road
Basom, NY 14013

Email: tonseneca@aol.com

**RE: North Seneca Solar Project
Towns of Junius and Waterloo, Seneca County, New York
Supplemental Phase IB Archaeological Survey**

Dear Chief Hill:

On behalf of North Seneca Solar Project, LLC (the Applicant), EDR conducted a supplemental Phase IB archaeological survey for the proposed North Seneca Solar Project (the Facility) located in the Towns of Junius and Waterloo in Seneca County, New York. The previous Phase IB archaeological survey conducted for the Facility was approved by the New York State Historic Preservation Office (NYSHPO) in a letter dated February 2, 2024.

Subsequent to this correspondence with NYSHPO, the Applicant decided to investigate a layout modification for the Facility's substation and associated infrastructure that would change the Limits of Significant Ground Disturbance (LSGD). A supplemental Phase IB archaeological survey was conducted across areas of untested elevated archaeological sensitivity within the potential LSGD (i.e., the Supplemental Phase IB Survey Area). No cultural materials were encountered during the survey and no archaeological sites were identified. These results were documented in the attached memorandum, which was provided to the NYSHPO on July 24, 2024.

Please provide any cultural resource comments to Kristy E. Primeau of the Office of Renewable Energy Siting (ORES) and copy Bradley W. Russell (NYSHPO). Their addresses are provided below.

Kristy E. Primeau, Ph.D., RPA
Agency Preservation Officer,
Renewable Energy Siting Specialist 3
Office of Renewable Energy Siting
W.A. Harriman Campus – Building 9
1200 Washington Avenue
Albany, NY 12226
kristy.primeau@ores.ny.gov

Bradley W. Russell, Ph.D.
Historic Preservation Specialist - Archaeology
New York Office of Parks, Recreation & Historic
Preservation
Division for Historic Preservation
OPRHP, PO Box 189
Waterford, NY 12188
Bradley.russell@parks.ny.gov

We sincerely appreciate the opportunity to work with you on this project. If you have any questions or require additional information, please contact me at azlotuchakozub@edrdpc.com or (315) 246-5384. We are confident the North Seneca Solar Project is being developed in a manner that is respectful and mindful of the Tonawanda Seneca Nation's heritage.

Sincerely,



Andrea Zlotucha Kozub, RPA
EDR Project Manager, Cultural Resources

Enclosure:

- Supplemental Phase IB Archaeological Survey Memorandum

Copies to:

- Kristy Primeau (ORES) - kristy.primeau@ores.ny.gov
- Jennifer Betsworth (ORES) - jennifer.betsworth@ores.ny.gov
- Bradley Russell (NYSHPO) - bradley.russell@parks.ny.gov
- Alex Page (Tonawanda Seneca Nation Attorney) – alex.c.page@gmail.com
- Chief Sam George (Cayuga Nation) - sevenclansam@gmail.com
- Clint Halftown (Cayuga Nation) - chalfstown@gocayuga.com
- Lee Alcott (Cayuga Nation Attorney) - lalcott@barclaydamon.com
- Rickey L. Armstrong (Seneca Nation of Indians) - rick.armstrong@sni.org
- Charisse Ground (Seneca Nation of Indians) - c.ground@sni.org

From: [Scott Abrams](#)
To: [Matthew Weiss](#)
Cc: [kristy.primeau@ores.ny.gov](#); [Jennifer.Betsworth@ores.ny.gov](#); [Bradley.Russell@parks.ny.gov](#); [Courtney Dohoney](#); [Camille Kaynor](#); [Andrea Zlotucha Kozub](#); [William Whipps](#)
Subject: North Seneca Solar Project
Date: Tuesday, August 13, 2024 9:24:40 AM
Attachments: [image001.png](#)
[image002.png](#)



IRONSCALES couldn't recognize this email as this is the first time you received an email from this sender S.Abrams@sni.org

Some people who received this message don't often get email from s.abrams@sni.org. [Learn why this is important](#)

[EXTERNAL SENDER]

Good morning,

The Seneca Nation currently has no objections or comments with this undertaking. We will refer to the SHPO for any ground disturbance monitoring (excavations), however, should anything of cultural significance (ancestral burials) be discovered please halt work and contact us immediately.

Thank you,



Scott A. Abrams

Assistant to the President - Seneca Nation

90 Ohi:yo' Way, Salamanca, NY 14779

716-945-1790 ext. 3009

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



**New York State
Parks, Recreation and
Historic Preservation**

KATHY HOCHUL
Governor

ERIK KULLESEID
Commissioner

August 14, 2024

Kristy Primeau
Agency Preservation Officer
Office of Renewable Energy Siting
1200 Washington Avenue, Building 9
Albany, NY 12226

Re: ORES
North Seneca Solar Project/105 MW/1909 Acres
22PR05554

Dear Kristy Primeau:

Thank you for requesting the comments of the Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted materials in accordance with the New York State Historic Preservation Act of 1980 (section 14.09 of the New York Parks, Recreation and Historic Preservation Law). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project.

OPRHP has reviewed the Supplemental Phase IB Archaeological Survey Memo for the North Seneca Solar Project/105 MW/1909 Acres project (22PR05554) prepared by EDR, Consulting Archaeologists (July 2024). OPRHP concurs with the report recommendation that no additional archaeological investigation is warranted. Provided that the previously approved avoidance measures are implemented, OPRHP has no further archaeological concerns with the project.

Please continue to consult with Robyn Sedgwick of our Technical Services Unit regarding mitigation of the adverse visual impacts of the project.

If you have any questions, I can be reached at Bradley.Russell@parks.ny.gov.

Sincerely,

A handwritten signature in black ink that reads "Brad Russell".

Bradley W. Russell, Ph.D.
Historic Preservation Specialist - Archaeology