

4.7 HISTORIC, CULTURAL, AND ARCHAEOLOGICAL RESOURCES

Written Comment 1II:

Per New York State Office of Parks, Recreation, and Historic Preservation the proposed windpark will have an adverse impact on culture resources within the Area of Potential Impact surveyed. Consequently, the project sponsor must work in consultation with OPRHP to pursue feasible and prudent plans that avoid or mitigate the adverse impacts. The DEIS includes a discussion of cultural resources in the project area and the Area of Potential Effect (APE) for visual impacts to historic resources as well as possible mitigation actions.

According to correspondence this month with OPRHP, they have not received any submissions from Allegany Wind LLC or its representatives since 2008. Please ensure OPRHP is in receipt of your recent work.

Response to Written Comment 1II:

The Project Sponsor is unaware of the “correspondence this month with OPRHP” mentioned by the commenter; however, the Project Sponsor has indeed submitted reports/studies to the OPRHP since 2008. Included in Appendix D of this FEIS is a June 11, 2010 letter from OPRHP (Nancy Herter) regarding archaeological resources, and a July 7, 2010 letter from the OPRHP (John Bonafide) regarding historic/architectural resources, and this correspondence indicates that OPRHP received cultural resource studies as recent as March 3, 2010. Also provided in Appendix D of this FEIS are response letters provided to the OPRHP.

Written Comment 54VV:

Cultural Resources:

- Clarify when in the process Mitigation Measures will be developed and implemented in consultation with SHPO and affected local governments. Discuss the timing for the preparation and completion of this plan.
- The discussion on DEIS p. 138, regarding the parties to be included in this consultation, is ambiguous. The historic district in the City of Olean is referenced, and then the text refers to the Town of Olean. Clarify the intended participants.

Response to Written Comment 54VV:

Please see the Cultural Resources Technical memorandum in Appendix D of this FEIS, which provides an updated regulatory context. The Project Sponsor does not expect that any wetland and/or stream permits would be required from the US Army Corps of Engineers (Corps) or New York

State Department of Environmental Conservation (DEC), nor from the New York State Public Service Commission (PSC). The proposed Project is therefore not expected to require formal review by OPRHP under either Section 106 of the National Historic Preservation Act or Section 14.09 of the New York State Parks, Recreation, and Historic Preservation Law. Thus the consultations will involve the affected local government, the Town of Allegany.

All potential impacts and proposed mitigation measures will be identified/evaluated during the SEQRA process. As part of the consultation on mitigation for unavoidable impacts to historic structures/cultural resources, the Town of Allegany has identified potential mitigation projects, which are listed below.

- Allegany Area Historical Association (1855 Greek Revival church)
 - painting the building exterior
 - weatherization for the building/storm windows for original stained glass
 - archival storage systems for collections
 - improved access to building and/or collections
- Addition to Allegany Senior Center
- Improvements to Town Hall
 - replacement of interior/exterior stairs
 - improvements to storage area for archival town records
 - energy conservation measures such as insulation and/or window replacement
- Allegany Public Library
 - energy efficient indoor/outdoor lighting
 - repairs to exterior of building (columns, etc.)
 - updated electrical and other wiring to accommodate computers, etc.
- Upgrade Town Cemeteries

The impacts on the cultural resources are almost entirely visual. Accordingly, the mitigation measures selected are in conformance with the mitigation recommendations in the DEC Policy on Assessing and Mitigating Visual Impacts, section V.D. Because of the unavoidable adverse impacts, the lead agency will select offsets from the above list to mitigate the impacts on cultural resources.

Written Comment 55A:

The proposed Allegany Wind Project referenced above has come to the attention of this Agency recently and we are writing to provide comment. We realize that the public comment period for the

Draft Environmental Impact Statement ended in May, so we would greatly appreciate your consideration and response to our comments at this time. Please note these comments do not represent the opinion of the State Historic Preservation Office (SHPO) of this Agency, which provides separate comment regarding the potential impacts of this project. Please reference the letter from John A. Bonafide to Kevin Sheen, EverPower Renewables dated July 7, 2010 for the most recent written correspondence from the SHPO on this project (O8PR06062).

Response to Written Comment 55A:

Responses are provided to the written comments of the NYS Office of Parks, Recreation and Historic Preservation (OPRHP), despite the fact that these comments were received after the close of the public comment period. It should be noted that the majority of the OPRHP comments are related to potential visual impacts, and these comments are provided in the "Visual and Aesthetic Resources" sub-section of FEIS Section 4.0 (see also the Visual Resources Technical Memorandum provided in FEIS Appendix E). It should also be noted the mitigation choice of offsets is similar to that employed by OPRHP in similar wind farm projects.

Written Comment 55E:

In addition to the resources listed in the John Bonafide letter of July 7, 2010, Appendix H of the *Master Plan for Allegany State Park* contains a Letter of Resolution from OPRHP Field Services Bureau, which lists all of the resources in Allegany State Park that are considered National Register Eligible. The review should be expanded to include these resources if it has not done so already.

Response to Written Comment 55E:

The Cultural Resources Technical Memorandum provided in Appendix D of this FEIS provides a response to review correspondence received from the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP) regarding the Project, which includes:

- Correspondence dated June 11, 2010 regarding the *Phase 1B Archeological Survey* report for the Project (JMA 2010a).
- Correspondence dated July 7, 2010 regarding the *Historic-Architectural Resources Survey* (HARS) report for the Project prepared by John Milner Associates, Inc. (JMA 2010b).
- Correspondence dated August 16, 2010 regarding potential visual impacts to the park (including but not limited to visual effects on cultural resources).

Specific to the Allegany State Park resources, the Cultural Resources Technical Memorandum indicates that the only available view of or from a historic resource in Allegany State Park that includes the Project is from the top of the fire tower located on Ridge Run Trail. The Project is 9.0 miles away from this location and would be partially screened by trees from this vantage point. The topographic viewshed, which is the most conservative assessment, indicates that the Project will not be visible from 81% of the areas in Allegany State Park, including all but one other identified historic resource (another fire tower located 14.9 miles from the Project). Existing forest vegetation screens views toward the Project from the areas within the park where the topographic viewshed indicates views of the Project are possible, thereby further minimizing any potential impact. Further, the distant views of the Project from the Park will not interfere with the public's use and enjoyment of that resource. Since the Project will not result in significant visual impacts to historic resources located in Allegany State Park, but will cause unavoidable adverse impacts in the Town of Allegany, the lead agency and Project Sponsor have focused on the Town in the selection of mitigation projects. Please see FEIS Appendix D for additional detail.