



New York State Office of Parks, Recreation and Historic Preservation
Historic Preservation Field Services Bureau
Peebles Island, PO Box 189, Waterford, New York 12188-0189

518-237-8643

January 22, 2007

Mr. Skip Brennan
Community Energy
480 Broadway, Suite 218
Saratoga Springs, NY 12866

Re: PSC/DEC
Jordanville Wind Project
Stark & Warren, Herkimer County
06PR01192

Dear Mr. Brennan:

Thank you for requesting the comments of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the project in accordance with the New York State Parks, Recreation and Historic Preservation Law, Section 14.09. Please be advised that if federal agency involvement occurs the project will also be evaluated under the Section 106 of the National Historic Preservation Act of 1966.

We have completed our review of the cultural resource information associated with the survey area for the project as defined in our generic wind farm survey guidance. As of this date we have not received a formal recommendation from the New York State Public Service Commission, the New York State Department of Environmental Conservation, or the United States Army Corps of Engineers as to the extent of the project they have determined (if any) to constitute the area of potential effect/impact. If that area differs (extends beyond) the area evaluated additional survey work will be required and supplemental comments will be issued by this office.

The evaluated survey area, as defined by our generic survey guidance, was a five-mile ring drawn around each of the individual turbine sites. The outer edges of these circles are connected thus producing a five-mile survey area around the entire project. It was also recommended that for an analysis of potential visual impacts to historic resources that the next step was to determine sight lines based on topographic features and the locations and maximum heights of each turbine. It is expected that any survey of potential visual analysis would also include the guidance established by the New York State Department of Environmental Conservation under their program policy titled: *Assessing and Mitigating Visual Impacts*.

Based on the survey report titled "Historic Architectural Resources Survey Jordanville Wind Farm Project" dated October 2006 a total of 92 historic properties were identified as being within the defined project survey area. This number reflects individual properties as well as parts of three National Register listed historic districts (Glimmerglass Historic District [J88], Springfield; East Main Street Historic [J86], Richfield Springs; Church Street Historic District [J84], Richfield Springs) and one eligible district (Waggoner Patent Historic District [J87], Springfield).

Of the properties identified in the report as meeting the Criteria for inclusion in the National Register of Historic Places we find that five (5) individual properties and two proposed historic districts (South Columbia Historic District and Newville Historic District) do not rise to this level of significance and are not eligible for inclusion in the register. In addition, three (3) properties previously identified as Not Eligible have been reviewed by this office and determined to *meet the criteria* for inclusion in the register. (see Appendix A) These additional properties are significant in their representation of the evolution of farms in the Town of Springfield.

The eligible and listed properties identified in the survey report (see Appendix A) are diverse in nature and their physical settings. Properties that will be in the view shed of the project include those in established village/hamlet settings as well as resources that occupy rural agricultural settings. With few exceptions the scale of the building stock is limited to the height of single and two-story residential, commercial and agricultural buildings with few non agricultural elements breaking the treetops. The largest single historic component within the survey area is the National Register eligible Waggoner Patent Historic District. Roughly one-half of the 17,000 acre district falls within the five-mile survey area. This district is characterized by a vernacular agricultural landscape composed of lot lines, field patterns, tree lines, hedgerows, vegetation, circulation systems and its vernacular architecture all considered as equal features within the district. In addition, a portion of the Glimmerglass Historic District, which is listed in the New York State and National Registers of Historic Places as a nationally significant resource, falls within the survey area of the project. The nomination document for the district provides the following synopsis of its significance:

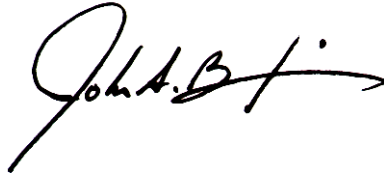
The Glimmerglass Historic District is significant under National Register criteria A, B, and C in the areas of settlement, literature, art, conservation, recreation, social history, architecture, and landscape architecture as an outstanding, intact, and clearly defined cultural landscape characterized by a distinctive set of ancient natural features and an overlay of built features reflecting historic land uses and human activity over a period of nearly two centuries. Beginning in 1785 and continuing through the nineteenth and twentieth centuries, the history and development of the district was, to a large degree, directly related to, inspired by, or dependent on the area's natural setting—an outstanding scenic environment that survives with a high degree of integrity today, retaining substantial evidence of its long and multi-layered history.

As such, this office believes that views from this district must be an integral component of the final assessment of alternatives to be discussed regarding impacts associated with this project. Although beyond the general five-mile limit established for most wind related projects, the clear and defined national level significance of this resource warrants its full consideration in the process.

That said, as defined in Section 14.09, 1(c) of New York State Parks and Recreation Law, it is the opinion of the New York State Historic Preservation Office that the undertaking identified as the Jordenville Wind Project will have an *Adverse Impact* on cultural resources within the Area of Potential Impact surveyed. Specifically, the introduction of the sleek, ultramodern, 400 foot tall kinetic wind turbines (up to 68 proposed) throughout this landscape forever alters and changes the rural setting, which itself is a significant element in much of the survey area and serves as the backdrop of the architectural and cultural heritage of these communities .

We now encourage the project sponsor to continue the consultation process under Section 14.09 by fully exploring all feasible and prudent alternatives and by giving due consideration to feasible and prudent plans that avoid or mitigate the adverse impacts. This consultation should involve those state agencies directly associated with the permitting/approval process for this project.

At this point in time we have concluded our evaluation of potential impacts to cultural resources associated with this project. If you should have questions regarding our evaluation process or the basis for our effect recommendation, please do not hesitate to contact me at 518-237-8643, ext.3263.

A handwritten signature in black ink, appearing to read "John A. B. F.", with a long horizontal flourish extending to the right.

28

cc: Jack Nasca, NYSDEC
Stephen Tomasik, NYSDEC
Andrew C. Davis, PSC
Douglas Ward

Appendix A

| JMA No.** | OPRHP USN No. | Name, address | Town/Village/Hamlet | NRHP/SRHP status* |
|------------------|---------------------------|---|--------------------------------|---------------------------------------|
| J1 | - | 3238 SR 168 | German Flatts (T) | NR Eligible |
| J2 | - | Keno House, 3187 SR 168 | German Flatts (T) | NR Eligible |
| J3 | 04305.000002 | Dennison Corners Community Church | German Flatts (T) | NR Eligible |
| J6 | 04301.000004 | Dutch Reformed Church Cemetery | Columbia (T) | NR Eligible |
| J7 | - | 0435 Huglick Road | Columbia (T) | NR Eligible |
| J8 | - | 966 SR 28 | Columbia (T) | NR Eligible |
| J10 | - | 184 McCoons Road | Columbia (T) South Columbia | Not NR Eligible |
| J11 | - | DL&W Depot 168 McCoons Road | Columbia (T) South Columbia | NR Eligible |
| J12 | - | 181 McCoons Road | Columbia (T) South Columbia | NR Eligible |
| J13 | - | 117 McCoons Road | Columbia (T) South Columbia | Not NR Eligible |
| J14 | - | 175 McCoons Road | Columbia (T) South Columbia | Not NR Eligible |
| J15 | - | Former milk plant 165 McCoons Road | Columbia (T) South Columbia | Not NR Eligible |
| J16 | - | Mahaqua 1039 Robinson Road | Warren (T) | NR Eligible |
| J17 | - | Shoemaker House Henderson Station 1971 Rock Hill Road | Warren (T) | NR Eligible |
| J18 | 04317.000002 | Holy Trinity Monastery 1165 Robinson Road | Warren (T) | Unevaluated |
| J19 | - | Hoyer Hill Cemetery 199 Henderson Road | Warren (T) | NR Eligible |
| J20 | 04317.000011 | King Farmhouse 3029 Jordanville Road | Warren (T) | NR Eligible |
| | 04317.000046 06NR05655 | "Sunset Hill" Stocker Estate 102 State Route 167 | Warren (T) | NR Eligible NR Listing in Progress |
| J21 | 04317.000025 | 162 Main Street | Warren (T) | NR Eligible |

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| | | | Jordanville | |
| J22 | 04317.000025 | Town Hall of Warren 166 Main Street | Warren (T) Jordanville | NR Eligible |
| J23 | 04317.000005 & 04317.000032 | Jordanville Public Library 189 Main Street | Warren (T) Jordanville | NR Listed |
| J24 | - | Jordanville Cemetery 199 Main Street | Warren (T) Jordanville | NR Eligible |
| J25 | - | Jordanville Federated Church 209 Main Street | Warren (T) Jordanville | NR Eligible |
| J26 | - | Higher Ground Farm B&B 259 Main Street | Warren (T) Jordanville | NR Eligible |
| J27 | - | Highland Rural Cemetery 1332 SR 167 | Warren (T) | Not NR Eligible |
| J28 | - | Crim Cemetery Williams Road N. | Warren (T) | NR Eligible |
| J29 | - | Sky High Farm 2892 Jordanville Road | Warren (T) | NR Eligible |
| J30 | - | R226 Blatchley Road | Warren (T) | NR Eligible |
| J31 | 04317.000012 | Church of the Good Shepard 6043 SR 167 | Warren (T) | NR Listed |
| J32 | - | 3755 US Route 20 | Warren (T) | NR Eligible |
| J33 | - | Tunnicliff 3907 US Route 20 | Warren (T) | NR Eligible |
| J34 | - | Warren Grange 810 4229 US Route 20 | Warren (T) | NR Eligible |
| J35 | - | 349 US Route 20 | Warren (T) | NR Eligible |
| J36 | 04308.000007 | Paines Hollow United Methodist Church 2452 SR 168 | Little Falls (T) Paines Hollow | NR Eligible |
| J37 | - | Garlock Cemetery 973 Johnnycake Road | Danube (T) | NR Eligible |
| J38 | 04302.000016 | Haupt-Jones House/Von Wellsheim 772 Fords Bush Road | Danube (T) Newville | NR Eligible |
| J39 | - | 775 Fords Bush Road | Danube (T) Newville | Not NR Eligible |
| J40 | - | 779 Fords Bush Road | Danube (T) Newville | Not NR Eligible |
| J41 | - | 785 Fords Bush Road | Danube (T) Newville | Not NR Eligible |
| J42 | 04302.000002 | Haupt-Cassadonte House 1004 Fords Bush Road | Danube (T) Newville | NR Eligible |
| J043 | - | 1003 Fords Bush Road | Danube (T) Newville | NR Eligible |
| J44 | - | 112 Creek Road | Danube (T) | NR Eligible |

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| | | | Newville | |
| J45 | 04302.000024 | Newville Union Church 117 Creek Road | Danube (T) Newville | NR Eligible |
| J46 | - | Shu-maker Mountain Climbers 599 Creek Road | Danube (T) Newville | NR Eligible |
| J47 | - | 134 Creek Road | Danube (T) Newville | NR Eligible |
| J48 | 04302.000023 | Tibbetts House 112 Tibbetts Road | Danube (T) | Not NR Eligible |
| J49 | 04302.000017 | Cronkhite House 2055 Fords Bush Road | Danube (T) | NR Eligible |
| J50 | 04302.000039 | Snell House/ Season's View Manor 588 Klock Road | Danube (T) | NR Eligible |
| J51 | - | 1459 Travis Road | Stark (T) Smith Corners | Not NR Eligible |
| J52 | - | 508 Aney Hill Road | Stark (T) | NR Eligible |
| J53 | - | 494 Cramer Corners Road | Stark (T) | NR Eligible |
| J54 | - | 111 Hoke Road | Stark (T) | NR Eligible |
| J55 | - | 386 Hoke Road | Stark (T) | NR Eligible |
| J56 | - | 3152 SR 80 | Stark (T) Starkville | NR Eligible |
| J57 | 04316.000008 | Carriage Shop/Bldg. G 3157 SR 80 | Stark (T) Starkville | NR Eligible District |
| J58 | 04316.000001 | Shoe Shop/Bldg. H 3159 SR 80 | Stark (T) Starkville | NR Eligible District |
| J59 | 04316.000009 | Storage Barn/Bldg. I 3159 SR 80 | Stark (T) Starkville | NR Eligible District |
| J60 | 04316.000001? | St. James Lutheran Church | Stark (T) Starkville | NR Eligible |
| J61 | - | 3229 SR 80 | Stark (T) Starkville | NR Eligible |
| J62 | 04316.000001? | United Methodist Church and Parsonage 6776 and 6778 SR 80 | Stark (T) Starkville | NR Eligible |
| J63 | - | 3261 SR 80 | Stark (T) Starkville | NR Eligible |
| J64 | - | Van Hornesville Fish Hatchery 1285 Chyle Road | Stark (T) | NR Eligible |
| J65 | -- | Van Hornesville Cemetery 298 Cemetery Road | Stark (T) Van Hornesville | NR Eligible |
| J66 | - | Mill Pond/Brookside Park | Stark (T) | NR Eligible |

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| | | 2260 SR 80 | Van Hornesville | |
| J67 | - | Mill :Pond Church 2264 SR 80 | Stark (T) Van Hornesville | NR Eligible |
| J68 | - | 2266 SR 80 | Stark (T) Van Hornesville | NR Eligible |
| J69 | - | Van Hornesville Country Store 2270 SR 80 | Stark (T) Van Hornesville | NR Eligible |
| J70 | - | United Methodist Church 2271 SR 80 | Stark (T) Van Hornesville | NR Eligible |
| J71 | - | 5914 Park Road | Stark (T) Van Hornesville | NR Eligible |
| J72 | - | Van Hornesville Mill 5916 Park Road | Stark (T) Van Hornesville | NR Eligible |
| J73 | - | 2281 SR 80 | Stark (T) Van Hornesville | NR Eligible |
| J74 | - | Van Hornesville Park Park Road and SR 80 | Stark (T) Van Hornesville | NR Eligible |
| J75 | - | Mill House 5920 Park Road | Stark (T) Van Hornesville | NR Eligible |
| J76 | - | 5922 Park Road | Stark (T) Van Hornesville | NR Eligible |
| J77 | - | 5926 Park Road | Stark (T) Van Hornesville | NR Eligible |
| J78 | - | 1112 Wiltse Hill Road | Stark (T) Van Hornesville | NR Eligible |
| J79 | - | 2301 SR 80 | Stark (T) Van Hornesville | NR Eligible |
| J80 | - | 2309 SR 80 | Stark (T) Van Hornesville | NR Eligible |

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| J81 | 04316.000015 | Owen D. Young Teacherage Bldg. 2317 SR 80 | Stark (T) Van Hornesville | NR Eligible District |
| J82 | 04316.000016 | Owen D. Young School 2316 SR 80 | Stark (T) Van Hornesville | NR Eligible District |
| J83 | - | 1248 SR 80 | Minden (T) | NR Eligible |
| J84 | 95NR01192 | Church Street Historic District | Richfield Springs (v) | NR Listed |
| J85 | 93NR004043 | West Main Street Historic District | Richfield Springs (v) | NR Listed |
| J86 | 95NR00890 | East Main Street Historic District | Richfield Springs (v) | NR Listed |
| J86a | 90NR02199 | US Post Office 12 East Main Street | Richfield Springs (v) | NR Eligible |
| J87 | - | Waggoner Patent Historic District | Springfield (T) | NR Eligible |
| J87a | - | 103 Hinds Road Springfield | Springfield (T) | NR Eligible |
| J87b | - | 403 Koenig Road Springfield | Springfield (T) | NR Eligible |
| J87c | - | 28 Mt. Tom Road Springfield | Springfield (T) | NR Eligible |
| J87d | - | Brookside Farm 8039 SR 80 | Springfield (T) | NR Eligible |
| J87e | - | 352 CR 29A | Springfield (T) | NR Eligible |
| J87f | - | Middle Village Cemetery Vanalstine Road | Springfield (T) | NR Eligible |
| J88 | 99NR01506 | Glimmerglass Historic District Otsego Lake vicinity | Springfield (T) | NR Listed |
| | | Previous Not NRE | | |
| | 07721.000640 | 765 CR 29 | Springfield (T) | NR Eligible |
| | 07721.000641 | 716 Doc McShane Road | Springfield (T) | NR Eligible |
| | 07721.000642 | Doc McShane Road | Springfield (T) | NR Eligible |