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T 301.306.6981  
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January 6, 2021

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

**RE: Request for Consultation: Proposed Mill Point Solar Project, Town of Glen, Montgomery County, New York**

Dear Mr. Mackay,

ConnectGen LLC (Applicant) proposes to construct the Mill Point Solar Project (Project) under Section 94-c of the New York State Law. The Project will obtain a siting permit from the Office of Renewable Energy Siting (ORES). The Project will obtain and adhere to all other applicable federal, state, and local permits not supplanted by 94-c, including a Section 404 permit from the USACE if Project activities will result in fill or dredge within jurisdictional wetlands and waters of the U.S. as well as an NYSDEC Article 24 permit if disturbance activities occur in NYSDEC state-protected wetlands or regulated adjacent areas. The Project will also be conducted in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Project will have a generating capability of 250+ megawatts (MW) of power located on land leased from owners of private property in the Town of Glen, Montgomery County (Project Area) (**Figure 1**).

Project components will include photovoltaic panels and associated racking systems, co-located inverters and medium voltage transformers, a Battery Energy Storage System (BESS), a new 345 kV substation and switching station, underground and/or overhead AC collection, access roads, temporary laydown areas, and a potential operations and maintenance facility located within an approximate 3,500-acre site (Project Area). The final solar array specification, as well as locations of arrays, will be finalized as part of ongoing engineering efforts.

TRC Companies, Inc. (TRC) has been retained by the Applicant to provide environmental review and licensing services in support of the Project. The purpose of this letter is to initiate formal consultation with the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP) in determining potential impacts to cultural resources that could result from the Project. TRC will also be undertaking cultural resource studies/surveys (Archaeology and Historic Architecture), as required, in support of Project review. To that end, TRC plans to conduct Phase IA and IB archaeological studies (as determined in consultation with your office) and a historic architectural survey in advance of proposed construction to identify potential impacts to cultural resources.

### **Archaeology**

TRC plans to conduct a Phase IA archaeological study, the objective of which will be to identify the archaeological sensitivity of the Project Area through review of known archaeological data, archival data, site file information, and previous cultural surveys. The goal of this review will be to identify where archaeological field testing (Phase IB survey) may be needed to identify archaeological resources within







Fourteen archaeological surveys have been conducted within a one-mile radius of the Project Area, one of which is within the current Project Area. Thirty consultation projects have been conducted within one mile of the Project Area, including one project within the Project Area boundary (**Figure 2**).



**Historic Architecture**

Consistent with the OPRHP Guidelines (*OPRHP 2020 Solar Guidelines*) for projects with solar arrays covering 100 acres or more, TRC completed a desktop historic architectural survey and GIS analysis identifying all areas within the Zone of Visual Impact (ZVI). The ZVI is defined as areas within a two-mile radius of the solar field that the bare earth topography visibility modeling shows will have positive visibility of the Project. Vegetation and buildings were not factored into the visibility modeling. TRC identified and mapped all previously identified NRHP listed and eligible architectural resources and architectural resources with an undetermined eligibility status as noted in OPRHP CRIS, within the ZVI.

A search of the on-line OPRHP CRIS database identified 471 previously identified historic architectural properties and architectural resources in the ZVI. Of the 471 previously surveyed architectural resources, 245 are listed in the NRHP, 45 have been determined NRHP eligible, 72 have been determined not eligible for the NRHP, and 109 have an undetermined eligibility status. Three NRHP-listed historic districts are located within the ZVI: the Glen Historic District, the New York State Barge Canal Historic District, and the Fultonville Historic District. The New York State Barge Canal Historic District is also a National Historic Landmark. One NRHP-eligible historic district, the Fonda Speedway, is located within the ZVI.

The Project Area is within the Mohawk Valley physiographic province. It features a rural character, with a few densely populated hamlets. The Project Area contains wooded areas, open fields, and agricultural land with sloping hillsides, wetlands and streams, and limited-use roads and private driveways. The terrain resulted from glaciofluvial processes and the relief ranges from gently to moderately-steeply sloping. As currently planned, the Project is expected to have no physical impacts to above-ground resources in the Project Area.

**Recommendations**

*Archaeology*

The majority of the Project Area is characterized as open agricultural fields and wooded areas. Should your office determine that a Phase IB survey is warranted, TRC assumes the survey would be limited to areas of significant ground disturbance within areas of high archaeological sensitivity as defined by your office for solar energy projects of this type. TRC will conduct the study in accordance with the New York Archaeological Council’s *Standards for Cultural Resource Investigations and the Curation of Archaeological Collections in New York State* (1994), and the State Historic Preservation Office’s *Phase I Archaeological Report Format Requirements* (2005).



### *Historic Architecture*

There are approximately 471 previously identified historic architectural properties and architectural resources within the ZVI. For this Near-Term Analysis of the anticipated Historic Architectural Resources Survey, TRC assumes the survey would be limited to those portions of the ZVI within which visibility modelling suggests the Project may be visible. Based on OPRHP guidelines for Solar Facility Development Cultural Resources Work, architectural resources that were previously determined not eligible for NRHP listing do not require further consideration. In order to complete the following phase, TRC will conduct the Historic Architectural Resources Survey in the ZVI in accordance with a methodology that is developed in consultation with, and approved by, OPRHP.

TRC respectfully requests your review of this information to determine the need for further study of potential Project effects as warranted. We look forward to receiving your comments in support of the permitting process. Should you have any questions or require additional information, please do not hesitate to contact me at (301) 276-8040, or [tsara@trccompanies.com](mailto:tsara@trccompanies.com).

Sincerely yours,

A handwritten signature in black ink, appearing to read "Timothy R. Sara".

Timothy R. Sara, RPA  
Program Manager, Cultural Resources

cc: Tegan Kondak, TRC

file 411360.0000.0000

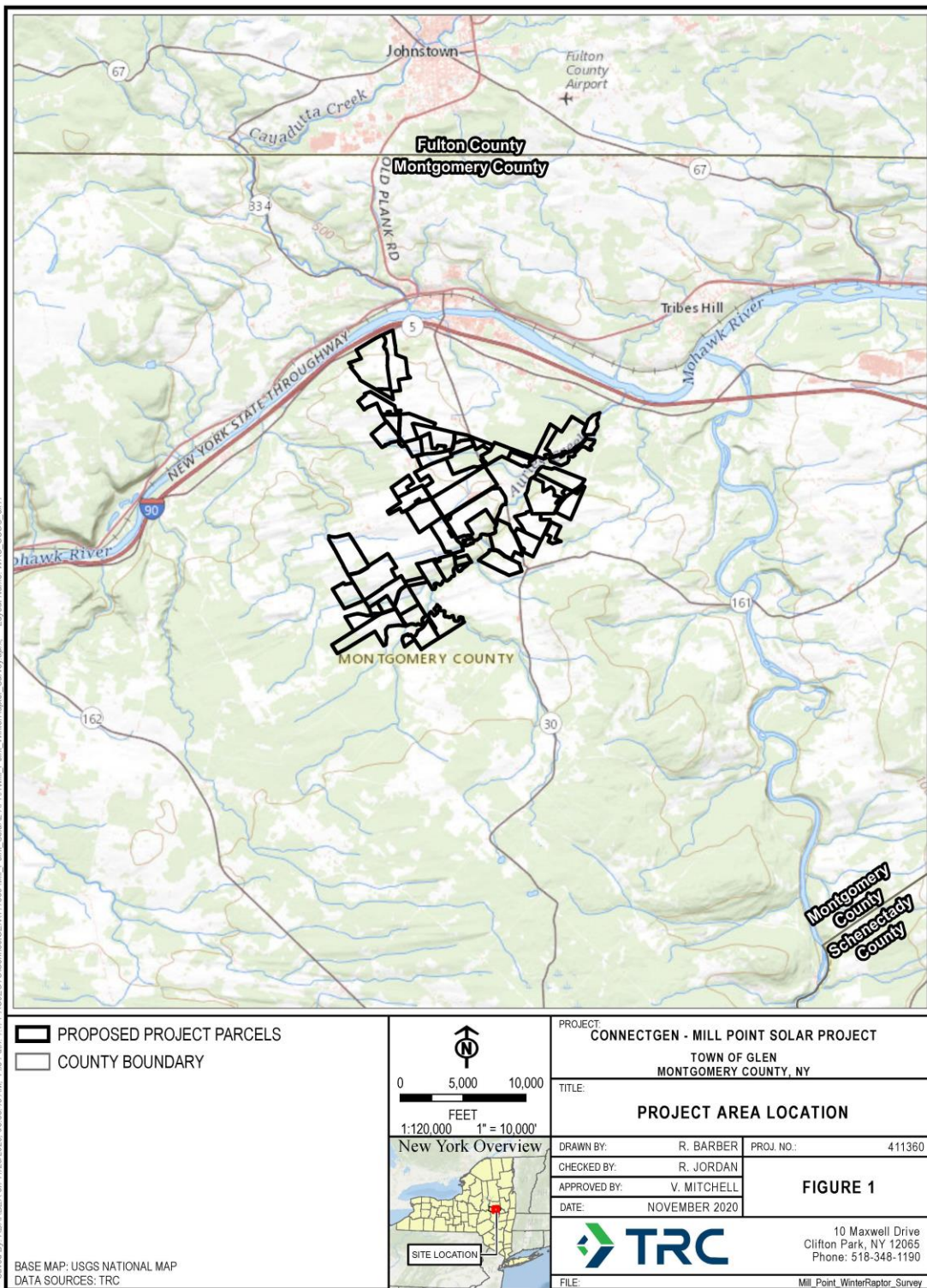
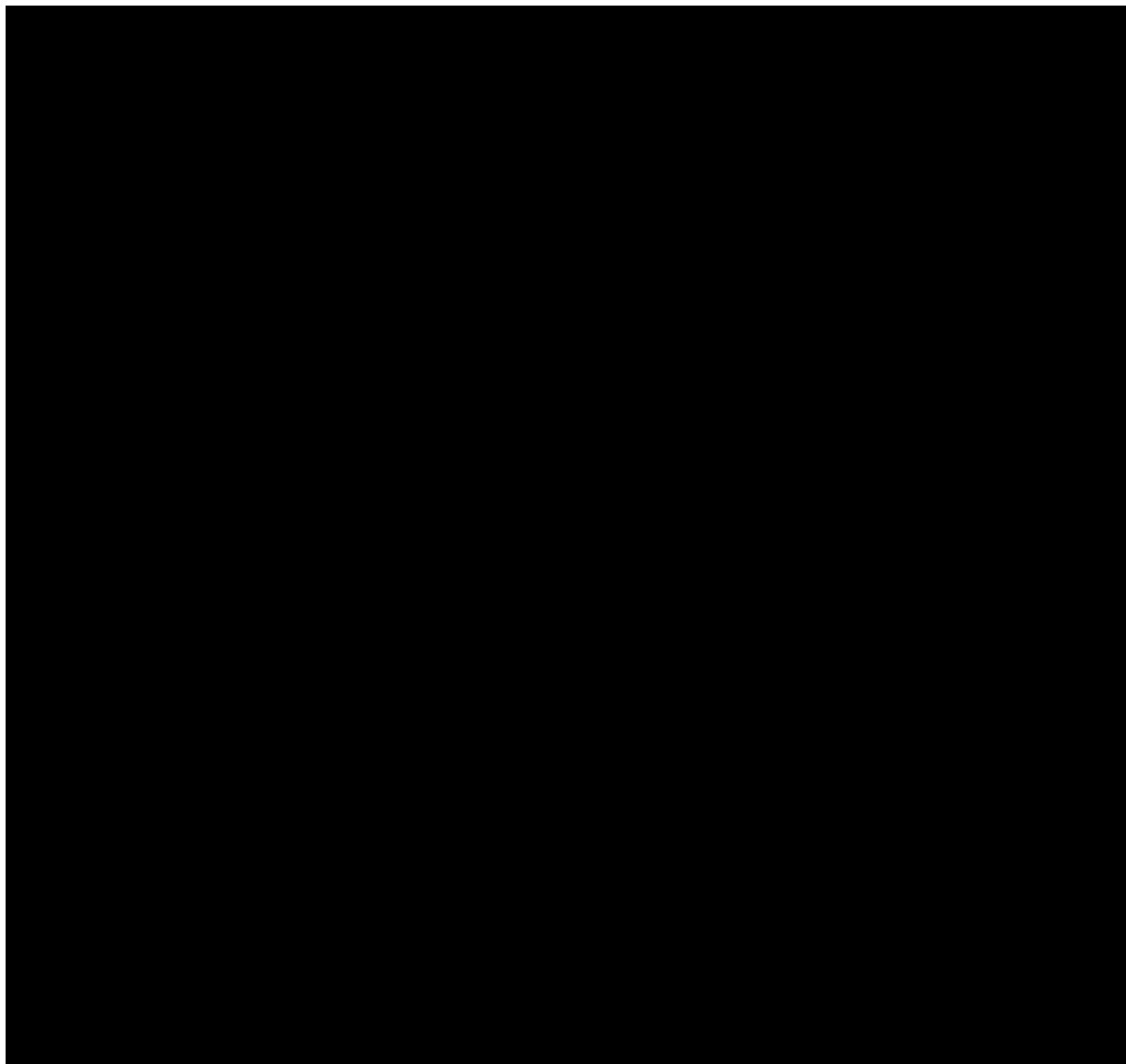


Figure 1: General Project location in Montgomery County, New York.







**Parks, Recreation  
and Historic Preservation**

**ANDREW M. CUOMO**  
Governor

**ERIK KULLESEID**  
Commissioner

**SOLAR FACILITY  
Phase IA Archaeological Survey Recommendations/Sensitivity Model**

**Project: Mill Point Solar Project/250 MW/3500 Acres**  
**PR#: 21PR00133**  
**Date: 1/12/2021**

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 State Historic Preservation Office/Office of Parks, Recreation and Historic Preservation (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 defines areas of high sensitivity, [REDACTED]

[REDACTED] 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 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 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 archaeological sites 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.

Please provide the interested Indian Nations with a copy of the Phase IA report, including the Phase IB archaeological testing scope-of-work and request that the Indian Nations provide cultural resource comments to the Secretary of the Public Service Commission (*address enclosed*) and copy the SHPO/OPRHP. Indian Nation contact information is enclosed.

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**Division for Historic Preservation**



If you have any questions concerning archaeology, please contact Jessica Schreyer at [Jessica.Schreyer@parks.ny.gov](mailto:Jessica.Schreyer@parks.ny.gov).

**Hon. Michelle L. Phillips**

Secretary to the Commission  
New York State Public Service Commission  
Agency Building 3  
Albany, NY 12223-1350  
Phone: (518) 474-2500  
Fax: (518) 474-9842  
E-mail: [secretary@dps.ny.gov](mailto:secretary@dps.ny.gov)

**St. Regis Mohawk Tribe (Federally Recognized)**

**Darren Bonaparte, Director**

Tribal Historic Preservation Office  
St. Regis Mohawk Tribe  
71 Margaret Terrance Memorial Way  
Akwesasne, NY 13655  
Phone: (518) 358-2272, ext. 2163  
Email: [darren.bonaparte@srmt-nsn.gov](mailto:darren.bonaparte@srmt-nsn.gov)



2200 Liberty Ave., Suite 100  
Pittsburgh, PA 15222

T 412.713.7100  
TRCcompanies.com

March 22, 2021

Erin Czernecki  
Historic Preservation Program Analyst  
Division for Historic Preservation  
New York State Office of Parks, Recreation and Historic Preservation  
Peebles Island State Park  
P.O. Box 189, Waterford, New York, 12188-0189

**RE: Submittal of Historic Architecture Survey Methodology: Proposed Mill Point Solar Project, Town of Glen, Montgomery County, New York (21PR00133)**

Dear Ms. Czernecki,

ConnectGen Montgomery County LLC, proposes to construct the Mill Point Solar Project (Project) through the Office of Renewable Energy Siting (ORES) under Section 94-c of the New York Executive Law (New York Codes, Rules and Regulations (NYCRR) Chapter XVIII, Title 19 Part 900, subparts 900-1 through 900-14). The Project will have a generating capability of 250+ megawatts (MW) of power located on land leased from owners of private property in the Town of Glen, Montgomery County. Your office, in its review comments received on January 13, 2021, through the Cultural Resources Information System (CRIS), requested that a Historic Architecture Survey be conducted for the Project via the Trekker mobile application.

- **Project Setting**

The Project Area is within the Mohawk Valley physiographic province. In general, it features a rural setting and contains wooded areas, open fields and agricultural land, wetlands and streams, and limited-use roads and private driveways. The Project is located in the vicinity of population centers at Fonda, Glen, and Fultonville. The terrain in the Project Area is characterized by gently rolling hills and areas of agricultural land.

- **Project Description**

Based on current design, Project components will include photovoltaic panels and associated racking systems, co-located inverters and medium voltage transformers, a Battery Energy Storage System (BESS), a new 345 kilovolt (kV) substation and switching station, underground and/or overhead alternating current (AC) collection, access roads, temporary laydown areas, and a potential operations and maintenance facility. Final solar array specifications, as well as locations of arrays, will be determined by ongoing engineering efforts.

- **Survey Methodology and Definition of Area of Potential Effect**

As per the January 13, 2021, New York State Office of Parks, Recreation and Historic Preservation (OPRHP) Project review request, TRC proposes the following survey methodology to complete the requested historic architectural survey and visual effects assessment. Based on the survey request, TRC will complete a survey of all properties 50 years old or older within the Zone of Visual Impacts (ZVI), or Area of Potential Effect (APE), which is defined as areas within the two-mile radius of the solar field that the bare earth topography visibility modelling shows will have positive visibility of the Project. Vegetation and buildings will not be factored into the visibility modelling.



TRC will identify and map all previously identified National Register of Historic Places (NRHP) listed and eligible architectural resources and architectural resources with an undetermined eligibility status in CRIS, within the ZVI, as defined above. TRC will complete a reconnaissance-level, historic architectural survey to identify, document, and evaluate for NRHP eligibility, architectural resources 50 years old or older within the ZVI. The survey will include updates to all previously identified resources from the following categories: resources with undetermined NRHP status in CRIS, NRHP-eligible resources, and NRHP-listed resources. TRC will pay close attention to newly identified resources and resources with an undetermined NRHP status that are found in concentrations or clusters that may form a historic district. TRC will photograph and update the NRHP status of previously surveyed resources.


Additionally, TRC’s Architectural Historians, who exceed the professional qualification standards set forth by the *Secretary of the Interior* for both Architectural Historians and Historians (36 Code of Federal Regulations [CFR] Section [§] 61), will survey new resources that, in their opinion, may meet NRHP eligibility criteria. All resources will be assessed from public rights of way. TRC will not inventory resources meeting the NRHP age criterion but lacking sufficient historic architectural integrity or historical merit to be recommended NRHP-eligible under any criterion. TRC will utilize the Trekker mobile application for completion of the survey.

- **Reporting**

TRC will submit an Historic Resources Survey Report that will include survey results and an assessment of adverse effects on historic properties (NRHP-listed, NRHP-eligible, and resources recommended NRHP-eligible). Trekker survey forms for each surveyed resource in the ZVI will be submitted to OPRHP via CRIS Trekker Manager. TRC will provide a spreadsheet and map that identify, per OPRHP’s request, all New York State and/or National Register listed properties and districts, and National Historic Landmarks with positive visibility of the Project within a 5-mile radius.

Should you have any questions or wish to discuss this work plan, please do not hesitate to contact me at 878.670.1957 or [mhyland@trccompanies.com](mailto:mhyland@trccompanies.com).

Respectfully submitted,

  
Matthew G. Hyland, Ph.D.  
Senior Architectural Historian

Cc: Rande Patterson, ConnectGen LLC  
Eddie Barry, ConnectGen LLC  
Nancy Vlahos, TRC  
Tim Sara, TRC  
Tegan Kondak, TRC

File: 411360.0000.0000



**Parks, Recreation,  
and Historic Preservation**

**ANDREW M. CUOMO**  
Governor

**ERIK KULLESEID**  
Commissioner

April 05, 2021

Tim Sara  
Program Manager, Cultural Resources  
TRC  
4425-B Forbes Blvd  
Lanham, MD 20706

Re: ORES  
Mill Point Solar Project/250 MW/3500 Acres  
Town of Glen, Montgomery County, NY  
21PR00133

Dear Tim Sara:

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 Report entitled "Phase IA Archaeological Survey, Mill Point Solar Project, Montgomery County, New York" prepared by TRC (March 2021; 21SR00196). OPRHP concurs with the report recommendations 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 [Jessica.Schreyer@parks.ny.gov](mailto:Jessica.Schreyer@parks.ny.gov).

Sincerely,

A handwritten signature in cursive script that reads "Jessica E. Schreyer".

Jessica Schreyer  
Scientist Archaeology



SENT via EMAIL

August 5, 2021  
St. Regis Mohawk Tribe  
Darren Bonaparte, Director Tribal Historic Preservation Office  
St. Regis Mohawk Tribe  
71 Margaret Terrance Memorial Way Akwesasne, NY 13655  
Phone: (518) 358-2272, ext. 2163  
Email: darren.bonaparte@srmt-nsn.gov

**RE: Project Outreach: Proposed Mill Point Solar Project, Town of Glen, Montgomery County, New York**

Dear Mr. Bonaparte,

ConnectGen Montgomery County LLC proposes to construct the Mill Point Solar Project under Section 94-c of the New York Executive Law in the Town of Glen, Montgomery County, New York (Figure 1 - Project Area). The Project will have a generating capacity of approximately 250 megawatts (MW). Approximately 4,000 acres are being evaluated as shown on Figure 1, and Project infrastructure will ultimately be sited on an approximately 1,500-acre subset. TRC Companies (TRC) has been retained by ConnectGen Montgomery County LLC to provide environmental review and licensing services in support of the Project. The purpose of this letter is to provide information on behalf of ConnectGen Montgomery County LLC with the St. Regis Mohawk Tribe to assist in determining potential impacts to cultural resources that could result from the Project.

As requested by the OPRHP, TRC has conducted a Phase IA archaeological study in support of the application and is pleased to submit the Phase IA report to the Tribe as Attachment A. The OPRHP has also requested that a Phase IB field survey be conducted for the Project, which will be conducted in accordance with Section 94-c. ConnectGen Montgomery County LLC would welcome any information you may have on significant archaeological, religious, or cultural sites that may be of special importance to the Tribe within the Project area. Please do not hesitate to contact Erin Steinwachs at [esteinwachs@trccompanies.com](mailto:esteinwachs@trccompanies.com) or myself at [tsara@trccompanies.com](mailto:tsara@trccompanies.com) should you require any additional information. As requested by the ORHP, TRC will provide any comments offered by the Tribe to the Office of Renewable Energy Siting (ORES), attention Houtan Moaveni, Executive Deputy Director, ORES, 99 Washington, Avenue, Albany, NY 12231.

Sincerely yours,

Timothy R. Sara, RPA  
Program Manager, Cultural Resources

cc: T. Kondak, TRC  
R. Patterson, ConnectGen  
K. Laughlin, ConnectGen

Attachments  
Attachment A Phase 1A for Mill Point Solar Project



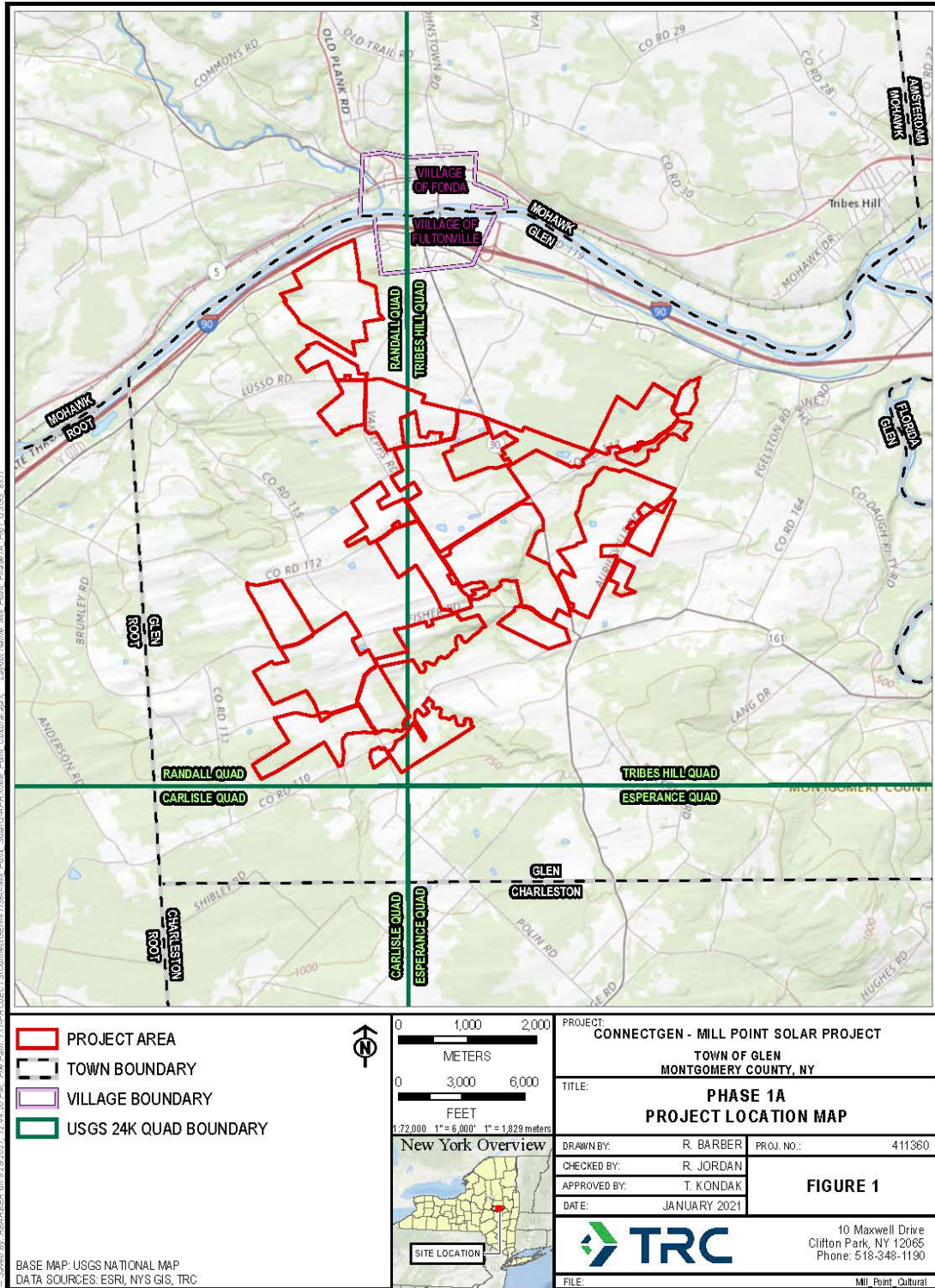


Figure 1: General Project location in Montgomery County, New York

**Attachment A**

**Phase IA Archaeological Survey  
Mill Point Solar Project  
Montgomery County, New York**





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

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

November 23, 2022

Tim Sara  
Program Manager, Cultural Resources  
TRC  
4425-B Forbes Blvd  
Lanham, MD 20706

Re: ORES  
Mill Point Solar Project/250 MW/3500 Acres  
Town of Glen, Montgomery County, NY  
21PR00133

Dear Tim Sara:

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).

We note that there are numerous historic resources listed and eligible for listing in the State and National Register of Historic Places within or near the project APE. We have reviewed the architectural survey and effects report dated October 2022. In order to continue our review of the project we respectfully offer the following comments and request additional information:

- We are particularly concerned with the project's impact on the Glen Historic District, which is noted for its rural, agricultural character. As such, please submit project plans of the APE nearest the historic district so the visual impact can be better understood.

Documentation requested in this letter should be provided via our Cultural Resource Information System (CRIS) at <https://cris.parks.ny.gov/>. Once on the CRIS site, you can log in as a guest and choose "submit" at the very top menu. Next choose "submit new information for an existing project". You will need this project number and your email address.

If you have any questions, please feel free to reach out via email.

Sincerely,

A handwritten signature in cursive script that reads "Wm Floyd".

William Floyd

Historic Preservation Technical Specialist

[william.floyd@parks.ny.gov](mailto:william.floyd@parks.ny.gov)

(518) 268-2142



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

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

July 14, 2023

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

Re: ORES  
Mill Point Solar Project/250 MW/3500 Acres  
Town of Glen, Montgomery County, NY  
21PR00133

Dear Kristy Primeau:

Thank you for continuing to consult 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 Parks, Recreation and Historic Preservation Law). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources.

We have reviewed the response letter dated June 16, 2023, and the associated visibility maps dated March 2023. Based on that review, OPRHP has *no above ground concerns*, as the solar array visibility from the Glen Historic District will be limited.

Please note that there are outstanding archaeology concerns. All archaeology questions should go to Jessica Schreyer ([Jessica.schreyer@parks.ny.gov](mailto:Jessica.schreyer@parks.ny.gov)).

If you have any questions, please feel free to reach out via email.

Sincerely,

William Floyd  
Historic Preservation Technical Specialist  
[william.floyd@parks.ny.gov](mailto:william.floyd@parks.ny.gov)  
(518) 268-2142

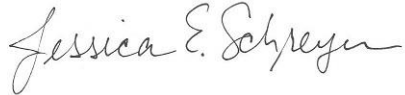


No further work is recommended for the [REDACTED] identified during the Phase IB survey.

For Sites [REDACTED], we recommend that either documentation of avoidance or Phase II site evaluations are submitted to our office for review.

If you have any questions, I can be reached at [Jessica.Schreyer@parks.ny.gov](mailto:Jessica.Schreyer@parks.ny.gov).

Sincerely,



Jessica Schreyer  
Historic Preservation Program Analyst - Archaeologist



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

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

December 4, 2023

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

Re: ORES  
Mill Point Solar Project/250 MW/3500 Acres  
Town of Glen, Montgomery County, NY  
21PR00133

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 *Addendum I, Additional Phase IB Archaeological Survey, Mill Point Solar I Project, Montgomery County, New York* (September 2023, 23SR00609) prepared by TRC. No archaeological sites were identified by the survey, and we recommend that no additional archaeological work is necessary in the areas investigated for this report.

If you have any questions, I can be reached at [Jessica.Schreyer@parks.ny.gov](mailto:Jessica.Schreyer@parks.ny.gov).

Sincerely,

A handwritten signature in cursive script that reads "Jessica E. Schreyer".

Jessica Schreyer  
Archaeology Unit Program Coordinator



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

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

December 4, 2023

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

Re: ORES  
Mill Point Solar Project/250 MW/3500 Acres  
Town of Glen, Montgomery County, NY  
21PR00133

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.

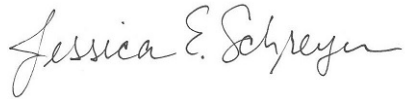
OPRHP has received the document entitled "Mill Point Solar 1 Avoidance Plans" that was submitted to our office on 11/17/2023. We have the following comments:

1. Please provide an Archaeological Site Avoidance Plan memo that includes a list of avoidance measures that will be implemented to protect the archaeological sites during construction including:
  - (a) Prior to construction, orange snow fencing should be installed between the construction activity areas and archaeological sites with 50-foot buffers.
  - (b) The fencing will be marked as an environmentally sensitive area not to be disturbed.
  - (c) Construction Plans and Specifications will be labelled to identify the area to be avoided and the fencing requirement.
2. Please append the "Mill Point Solar 1 Avoidance Plans" file to the avoidance plan and please label the archaeological sites within the Archaeologically Sensitive Areas.



Please submit the Avoidance Plan to our office for review. If you have any questions, I can be reached at [Jessica.Schreyer@parks.ny.gov](mailto:Jessica.Schreyer@parks.ny.gov).

Sincerely,

A handwritten signature in cursive script that reads "Jessica E. Schreyer".

Jessica Schreyer  
Archaeology Unit Program Coordinator



## MEMORANDUM

**TO:** Jessica Schreyer – Historic Preservation Program Analyst – Archaeologist, Division for Historic Preservation, Office of Parks, Recreation and Historic Preservation

**FROM:** Tim Sara, RPA. – Cultural Resources Program Manager, TRC

**SUBJECT:** Mill Point Solar I Project (21PR00133) Archaeological Site Avoidance Plan

**DATE:** December 12, 2023

**CC:** Erin Steinwachs, TRC  
Tegan Kondak, TRC  
Kristy Primeau, ORES  
Kala Laughlin, ConnectGen  
file: 411360.2000.0000

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In response to the Office of Parks, Recreation, and Historic Preservation (OPRHP) review letter dated December 4, 2023, TRC is pleased to submit the following Archaeological Site Avoidance Plan for archaeological sites [REDACTED] for the referenced project, as requested by your office.

This plan will confirm that the above-mentioned archaeological sites will be avoided by project design and during construction to assure that no impacts are made to these resources.

[REDACTED]

[REDACTED]  
[REDACTED] The site boundary including a 50-foot buffer and the high archaeological sensitivity within the survey area are [REDACTED]  
[REDACTED]  
[REDACTED] (Attachment 1).

[REDACTED]

[REDACTED]  
[REDACTED] The site boundary including a 50-foot buffer and the high archaeological sensitivity within the survey area are also shown in **Figure 1**. The Site Avoidance Area is also [REDACTED]  
[REDACTED] (see Attachment 1).

### Protective Fencing

To further protect these resources during construction activities, temporary fencing will be installed prior to and during construction. The Avoidance Plan provides for the establishment of the temporary protective

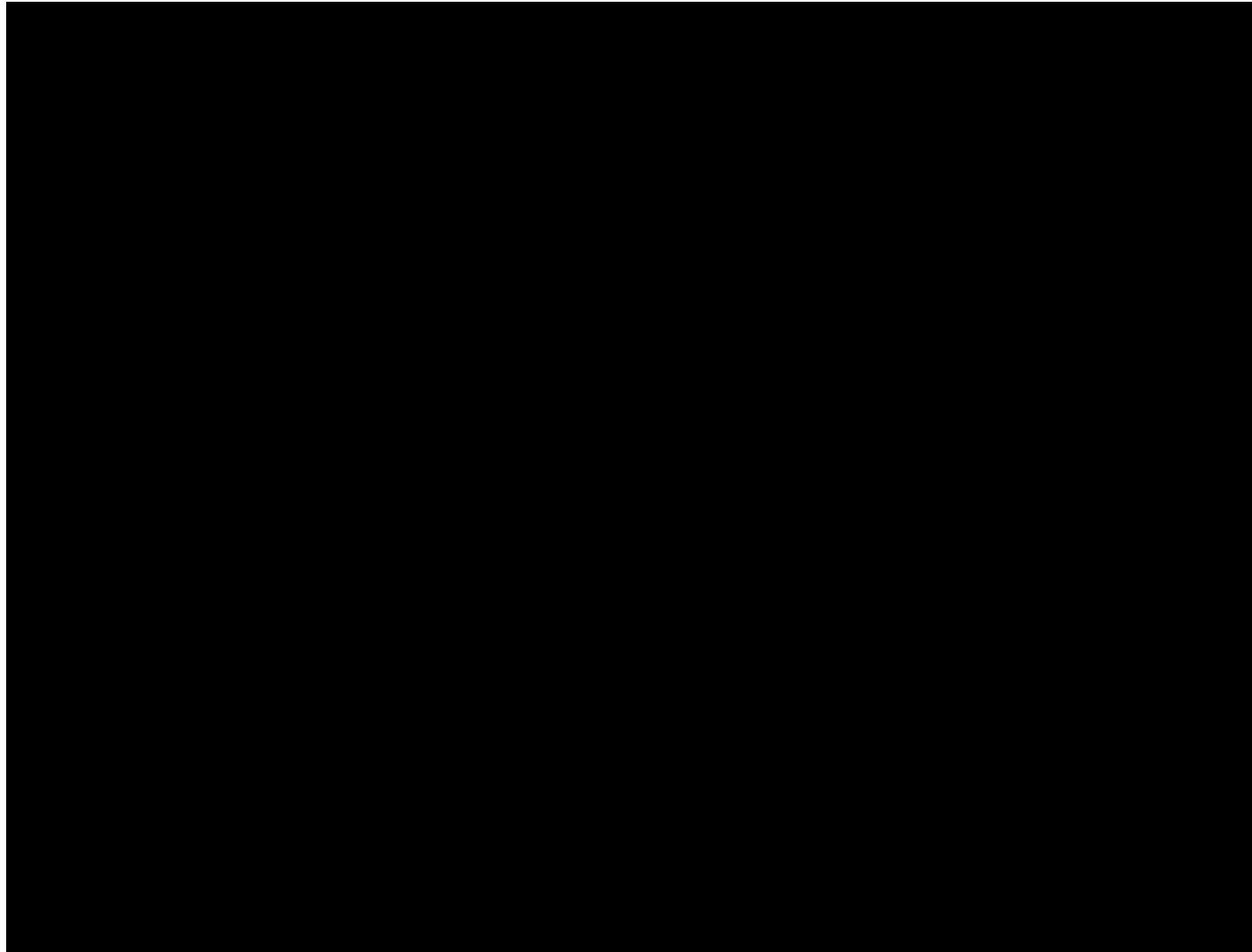


fence during construction activities and will consist of orange snow fencing established along the perimeter of each archaeological site's 50-foot buffer. The snow fence will consist of Tenax, 4-foot high durable fence (or its equivalent) installed along posts established on 8-foot centers.

- The protective snow fence around each site perimeter will remain in place upon completion of all construction activities.
- The fencing will be marked as an environmentally sensitive area not to be disturbed.
- Construction Plans and Specifications will be labeled to identify the area to be avoided and the fencing requirement (see Attachment 1).
- Once all construction activities are completed, the temporary fence will be removed so as not to draw attention to the archaeological resource.

Should you have any questions on the proposed Avoidance Plan or require additional information, please do not hesitate to contact me at (301) 276-8040, or [tsara@trccompanies.com](mailto:tsara@trccompanies.com).

A handwritten signature in black ink, appearing to read "Sara" or "Tsara", written in a cursive style.



**Figure 1: Site boundaries with 50-foot avoidance buffer, high archaeological sensitivity, and survey areas within the Mill Point Solar I Project.**



# MILL POINT SOLAR I PROJECT

TOWN OF GLEN  
MONTGOMERY COUNTY, NEW YORK  
LAT: N042° 54' 38"  
LONG: W074° 21' 60"

**PREPARED FOR:**  
CONNECTGEN MONTGOMERY COUNTY LLC  
1001 MCKINNEY ST., SUITE 700  
HOUSTON, TX 77002

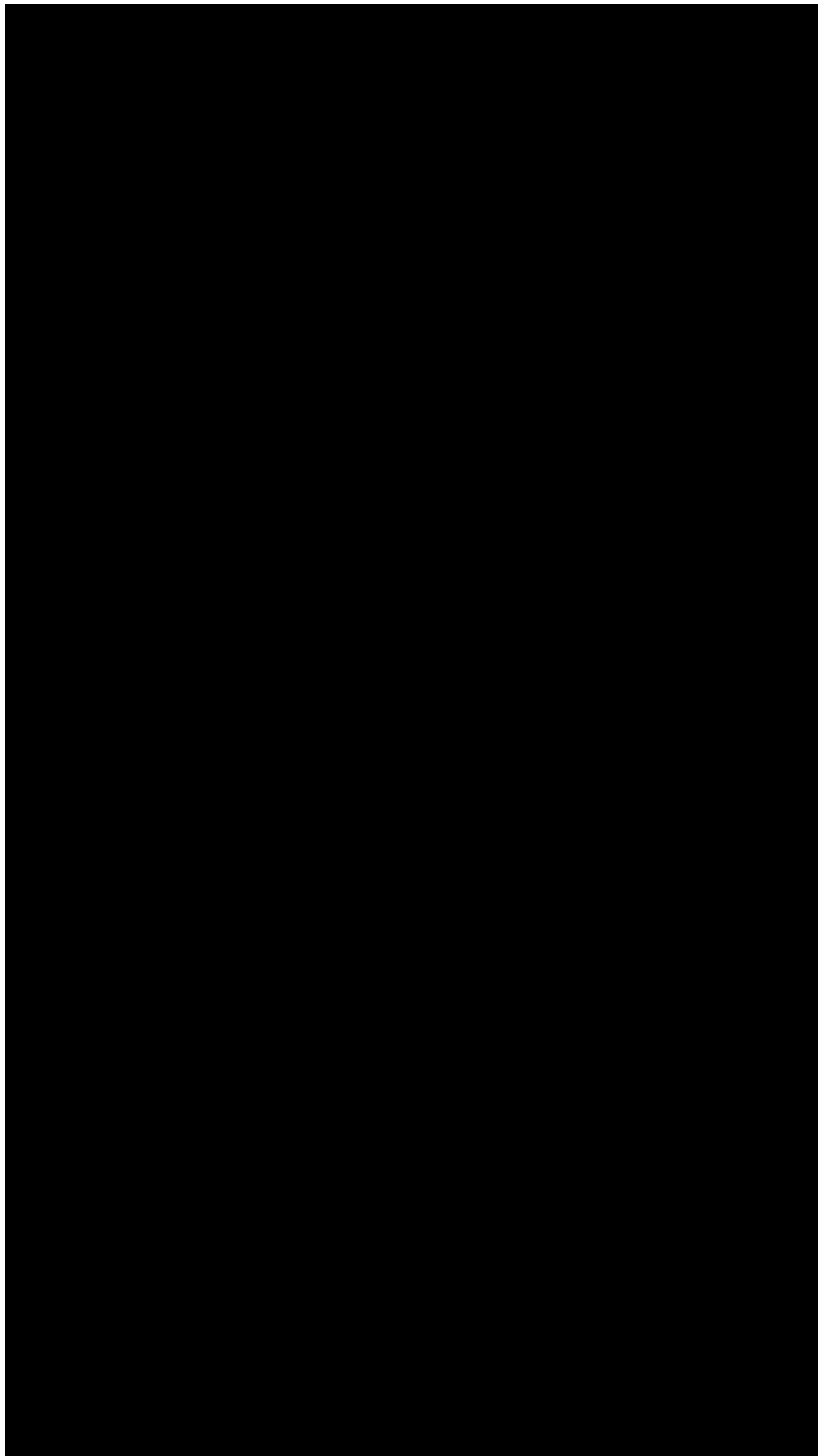
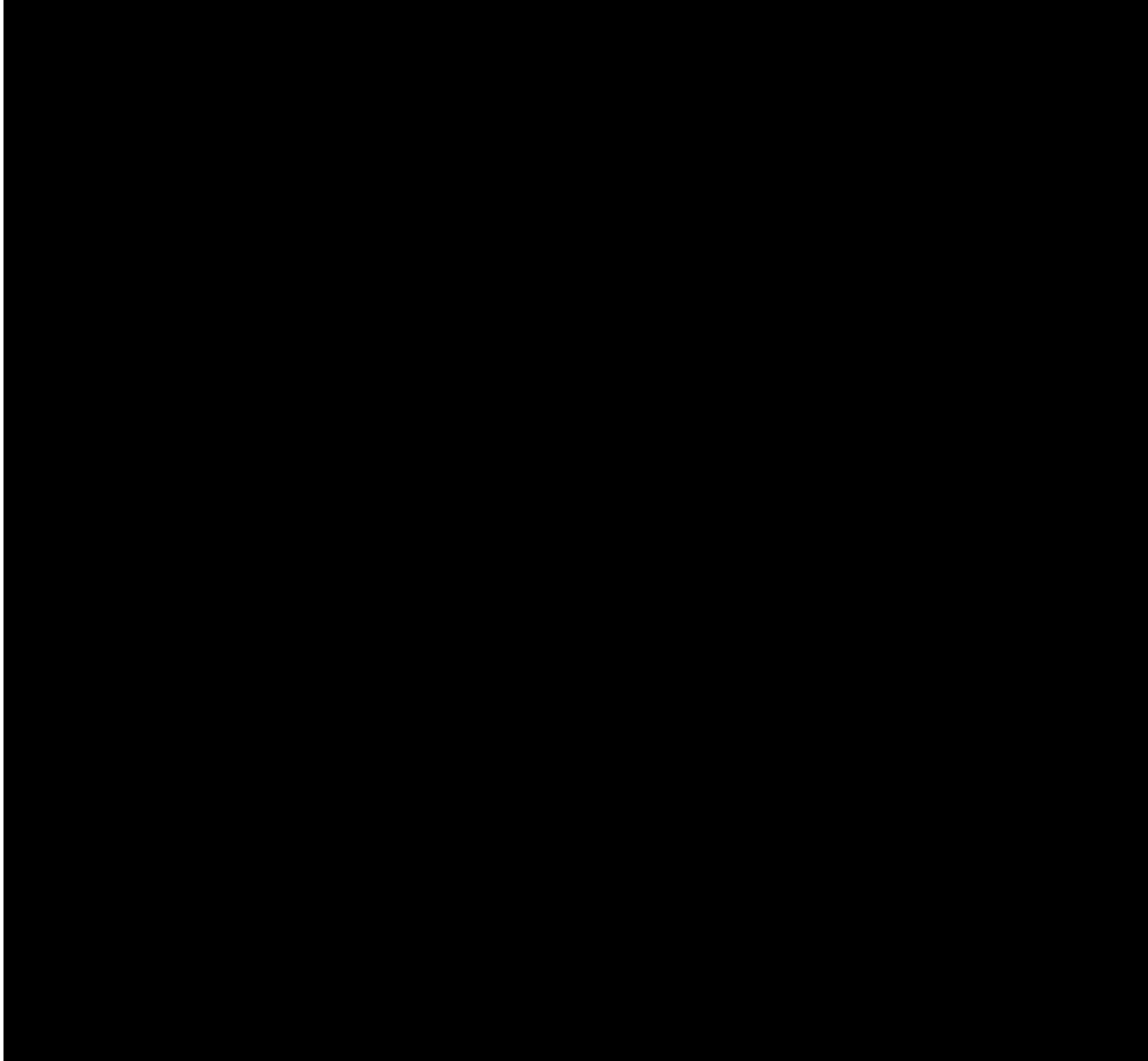
**CIVIL ENGINEER:**  
TRC ENGINEERS, LLC  
249 WESTERN AVE.  
AUGUSTA, ME 04330

**ELECTRICAL ENGINEER:**  
TRC ENGINEERS, LLC  
249 WESTERN AVE.  
AUGUSTA, ME 04330

**ENVIRONMENTAL SERVICES:**  
TRC ENVIRONMENTAL, LLC  
3 CORPORATE DRIVE, SUITE 202  
CLIFTON PARK, NY 12065

**GEOTECHNICAL ENGINEER:**  
TRC ENGINEERS, LLC  
16000 COMMERCE PARKWAY, SUITE B  
MOUNT LAUREL, NJ 08054

**SURVEY PROVIDED BY:**  
THEW ASSOCIATES PLLC  
6431 US HIGHWAY 11  
CANTON, NY 13617



**ENGINEERS OF RECORD:**  
THE CIVIL ENGINEERING AND LANDSCAPING PLANS  
WERE PREPARED UNDER THE DIRECTION OF  
PATRICK M MARTIN, PE (NY 100151)

THE TRANSMISSION ENGINEERING PLANS WERE  
PREPARED UNDER THE DIRECTION OF KEVIN  
MARTIN, PE (NY 099090)

UNDER NEW YORK STATE EDUCATION LAW ARTICLE  
145 (ENGINEERING), SECTION 7209 (2), IT IS A  
VIOLATION OF THE LAW FOR ANY PERSON, UNLESS  
ACTING UNDER THE DIRECTION OF A LICENSED  
PROFESSIONAL ENGINEER, TO ALTER THIS DOCUMENT.



**PRELIMINARY**  
NOT FOR CONSTRUCTION

MILL POINT SOLAR I PROJECT  
CONNECTGEN MONTGOMERY COUNTY LLC  
COVER SHEET

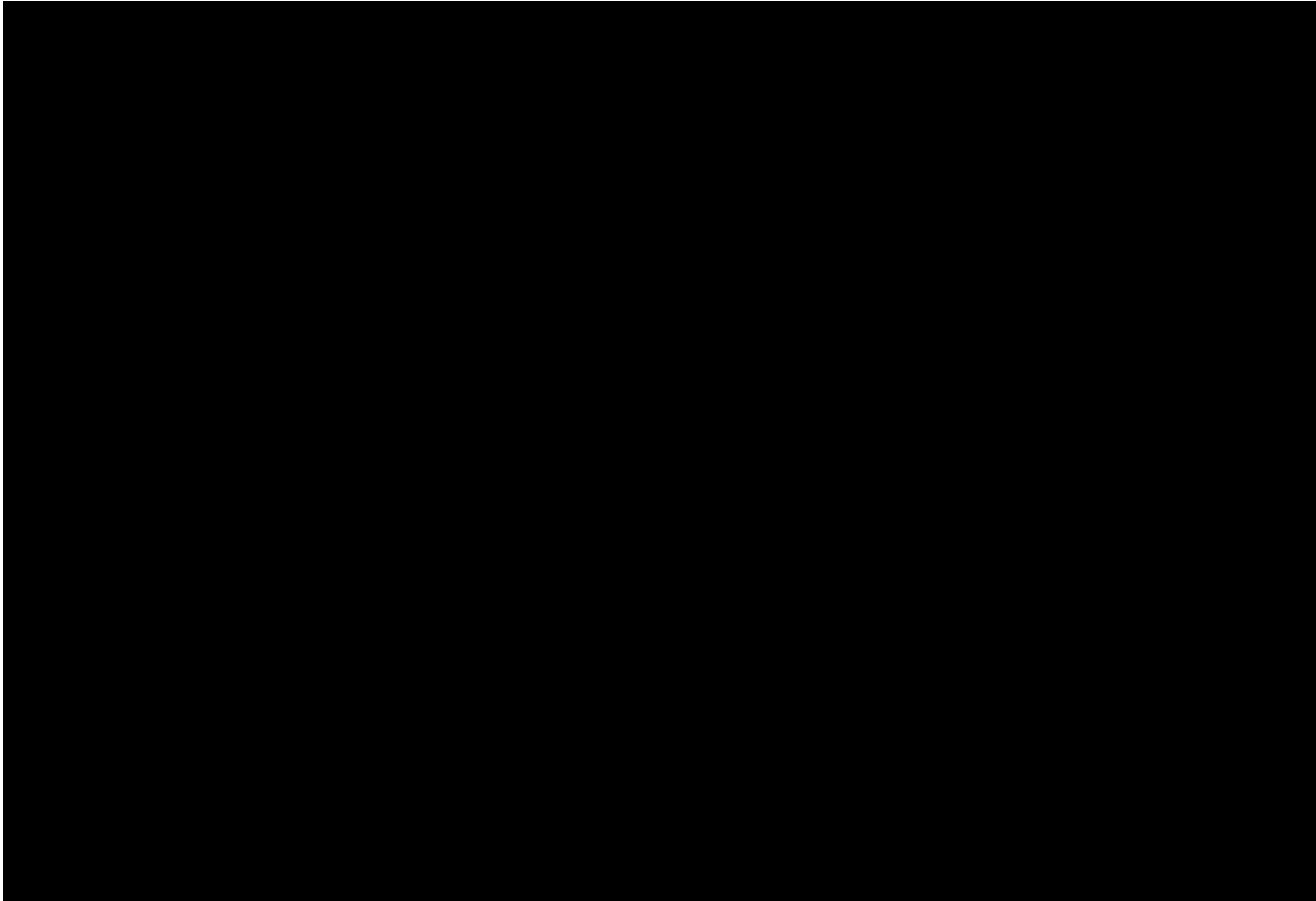
GLEN NEW YORK

11/22/2021  
DATE  
AS NOTED  
SCALE



MPS-C-100-01

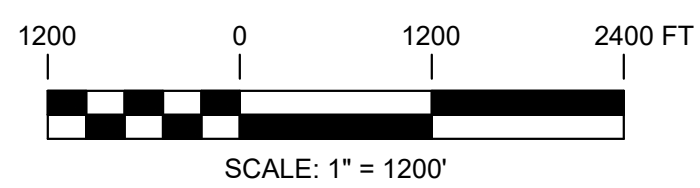
REV.  
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PRELIMINARY  
NOT FOR CONSTRUCTION

MILL POINT SOLAR I PROJECT  
CONNECTGEN MONTGOMERY COUNTY LLC  
OVERALL SITE PLAN

GLEN NEW YORK



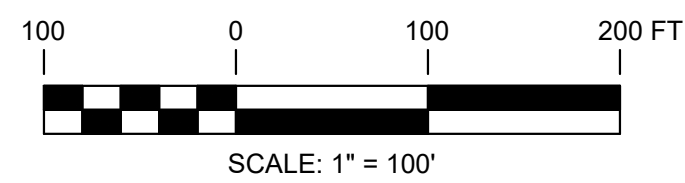
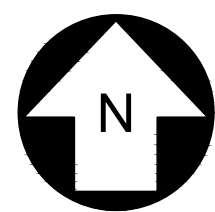
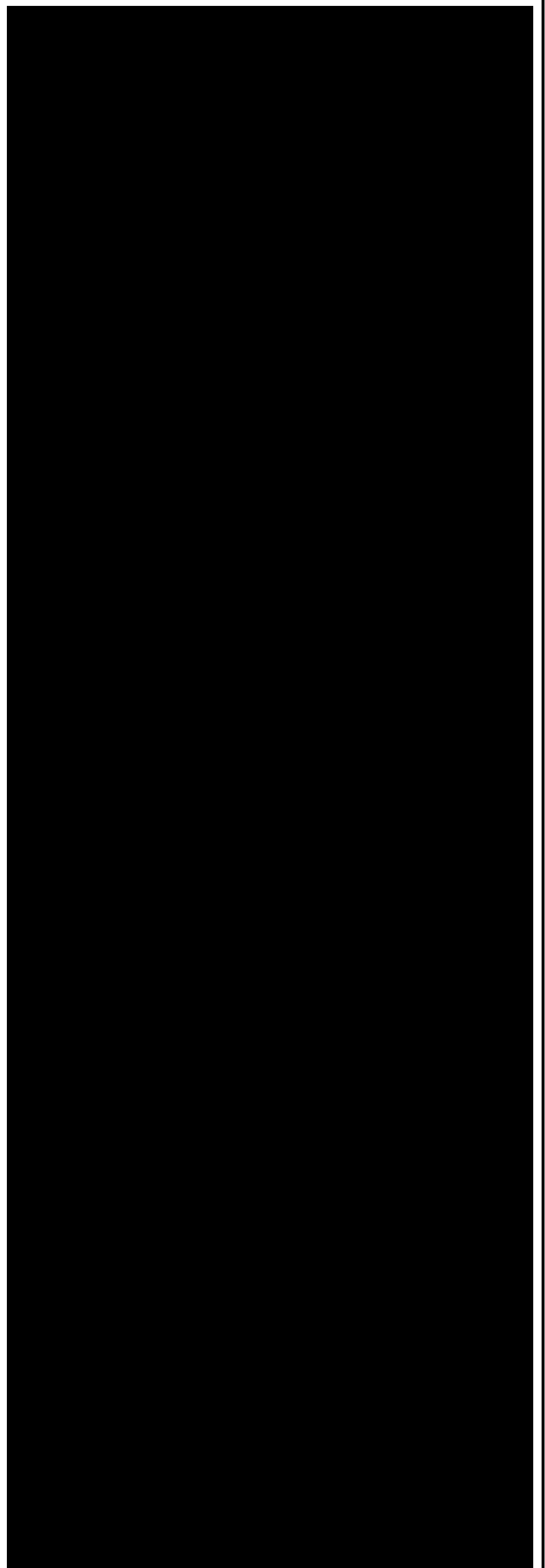
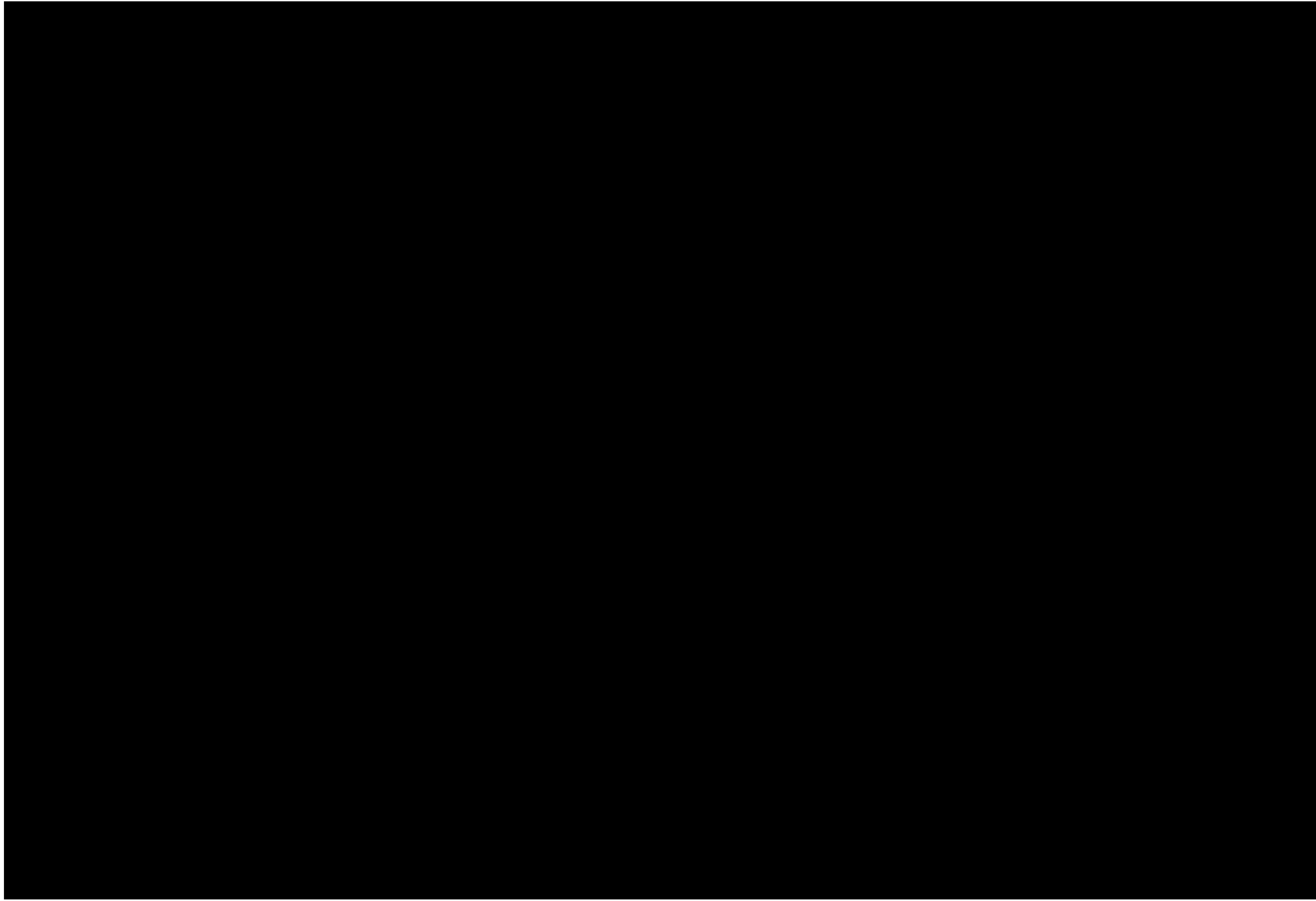
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MPS-C-100-04

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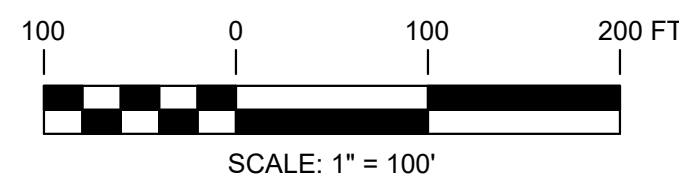
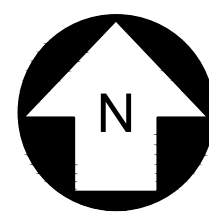
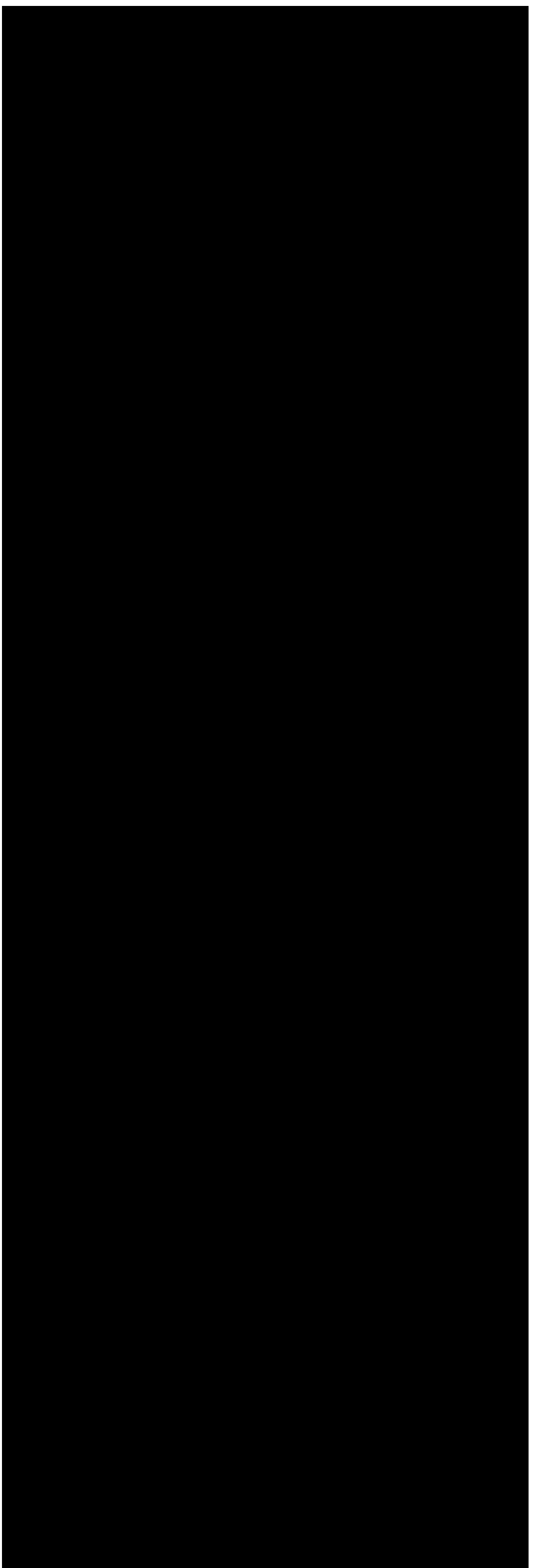
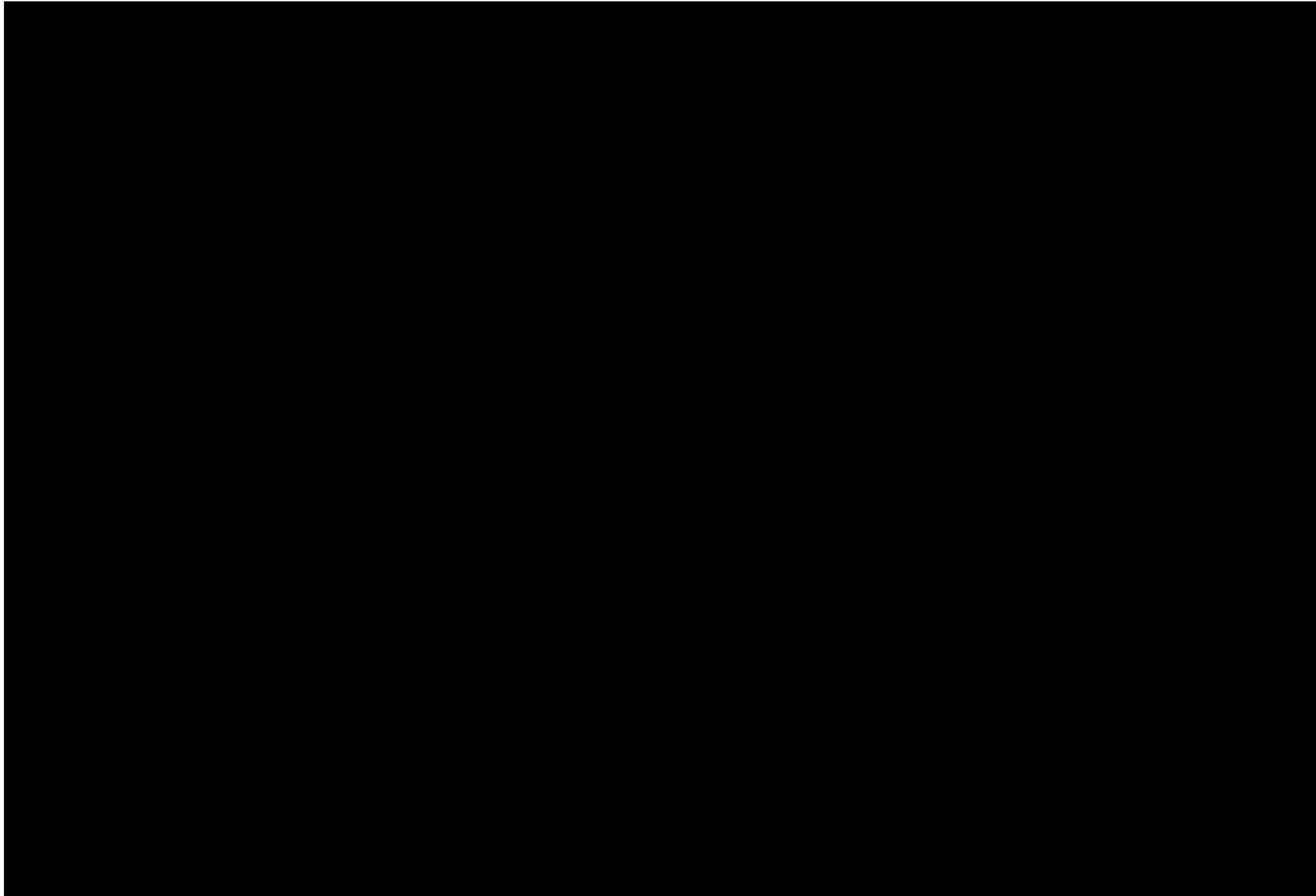


PRELIMINARY  
NOT FOR CONSTRUCTION

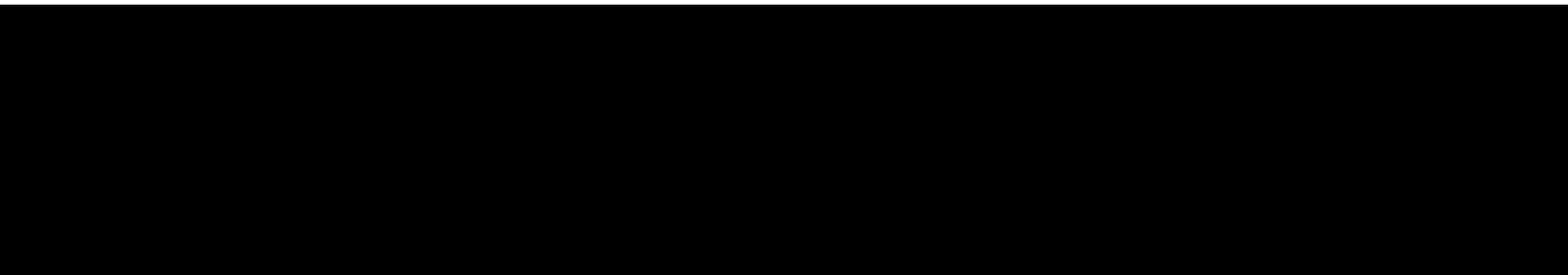
MILL POINT SOLAR I PROJECT  
CONNECTGEN MONTGOMERY COUNTY LLC  
EXISTING CONDITIONS, DEMOLITION AND REMOVALS PLAN

GLEN NEW YORK

03/01/2023 DATE		MPS-C-101-42	REV. A
1" = 100' SCALE			



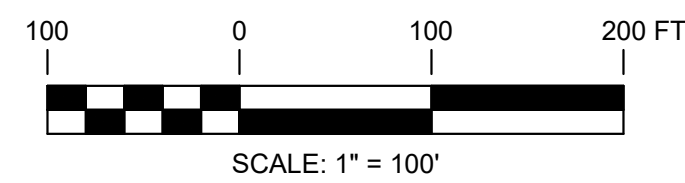
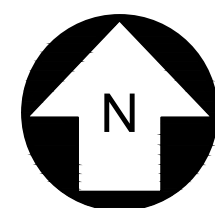
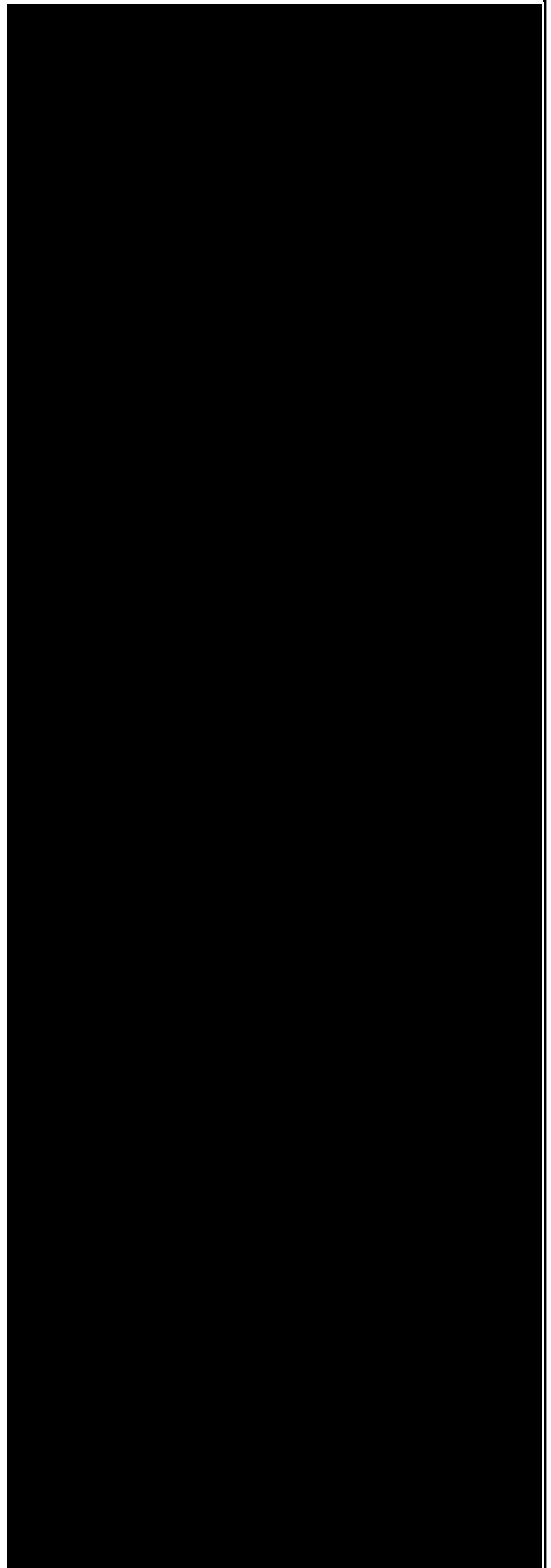
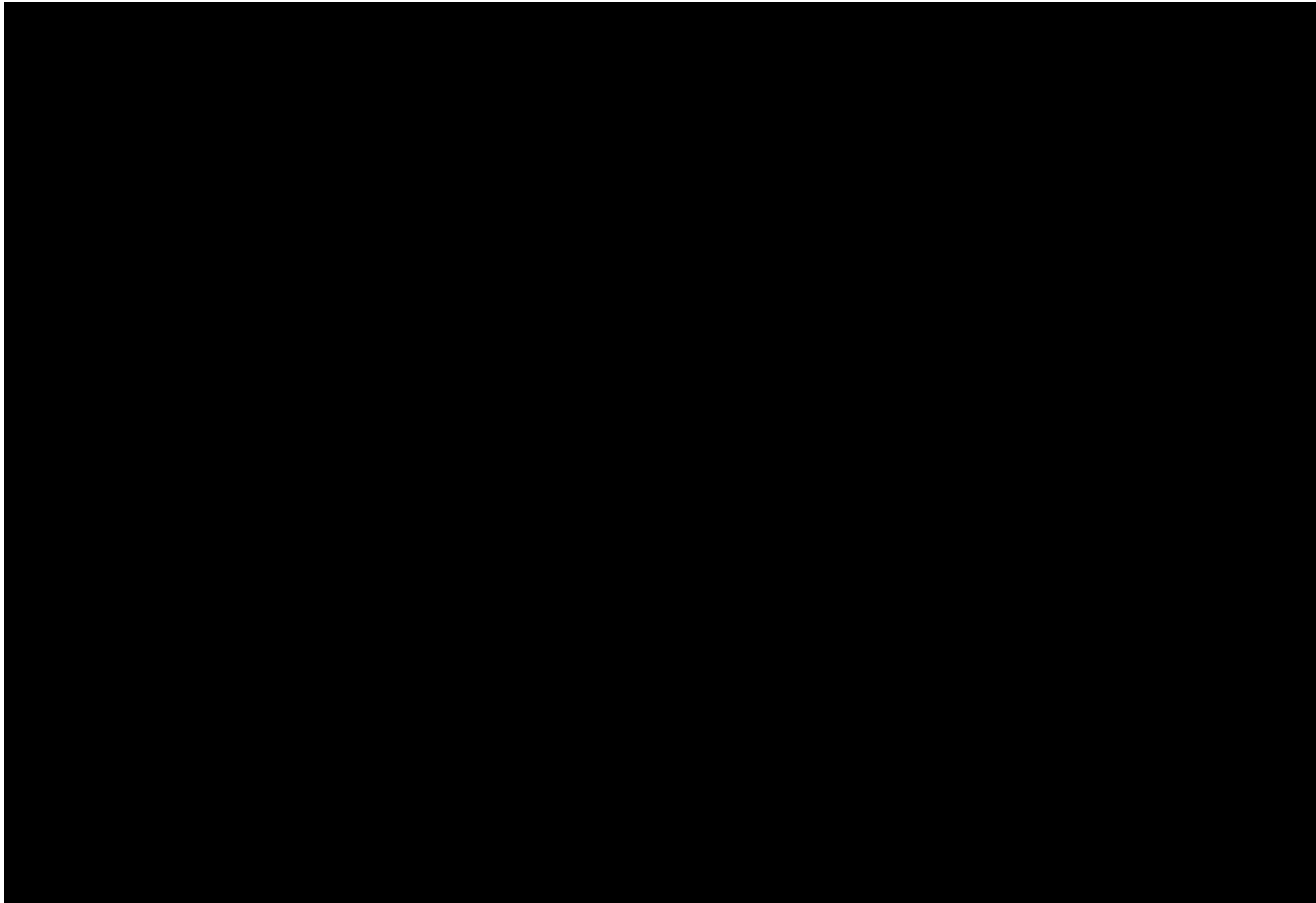
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NOT FOR CONSTRUCTION



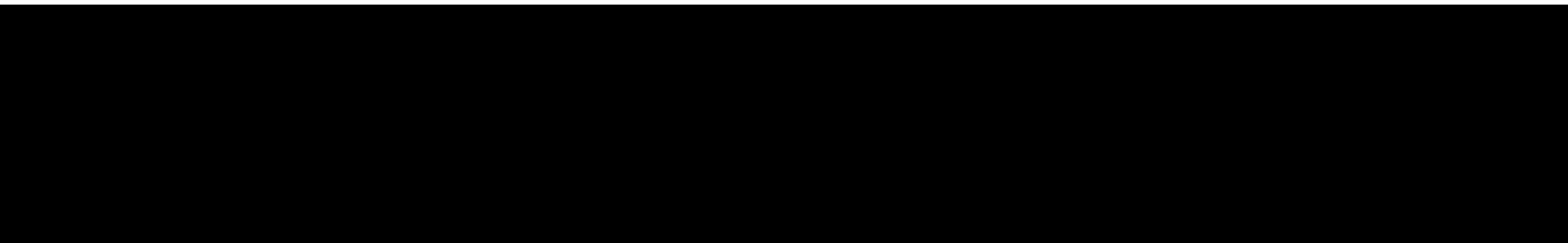
MILL POINT SOLAR I PROJECT  
CONNECTGEN MONTGOMERY COUNTY LLC  
EXISTING CONDITIONS, DEMOLITION AND REMOVALS PLAN

GLEN NEW YORK

03/01/2023 DATE		MPS-C-101-43	REV. A
1" = 100' SCALE			



PRELIMINARY  
NOT FOR CONSTRUCTION



MILL POINT SOLAR I PROJECT  
CONNECTGEN MONTGOMERY COUNTY LLC  
SITE AND GRADING PLAN

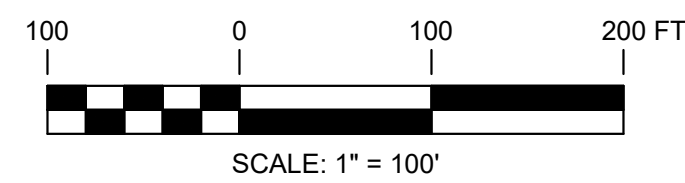
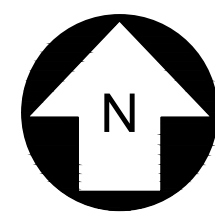
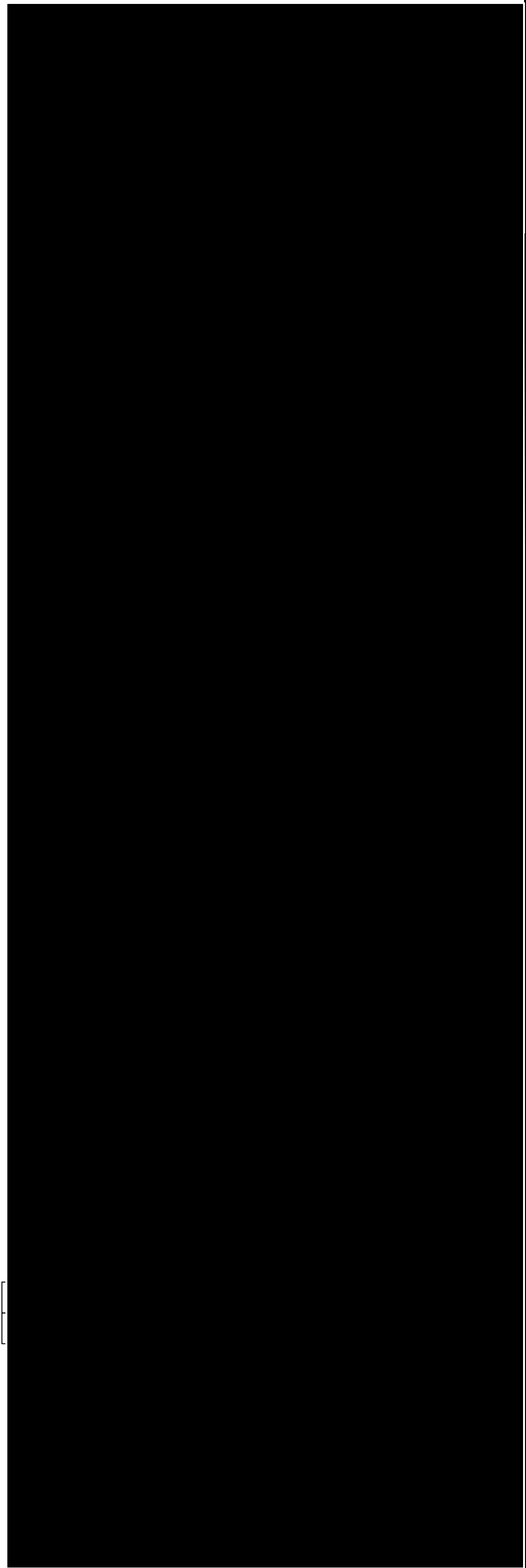
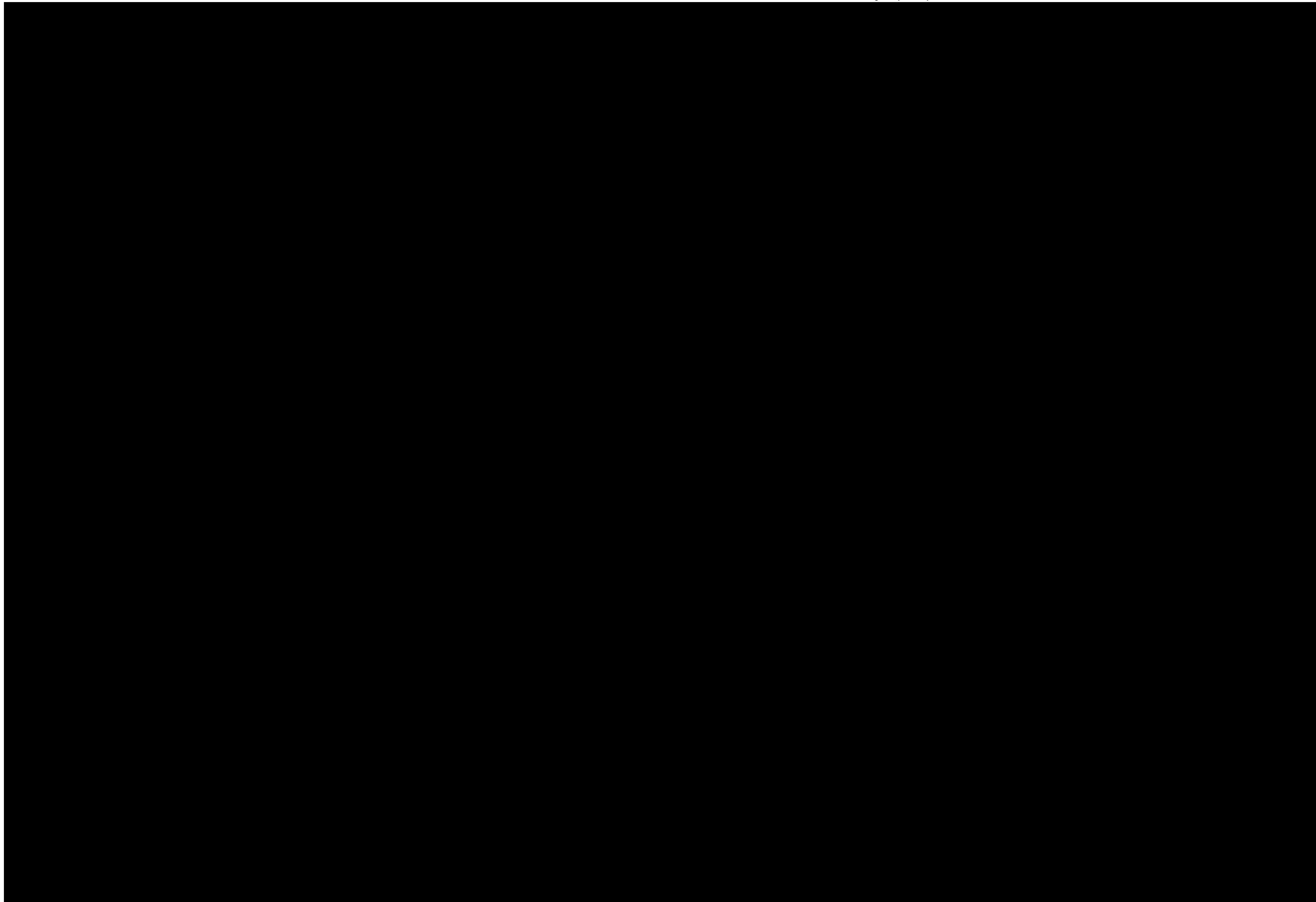
GLEN NEW YORK

03/01/2023  
DATE  
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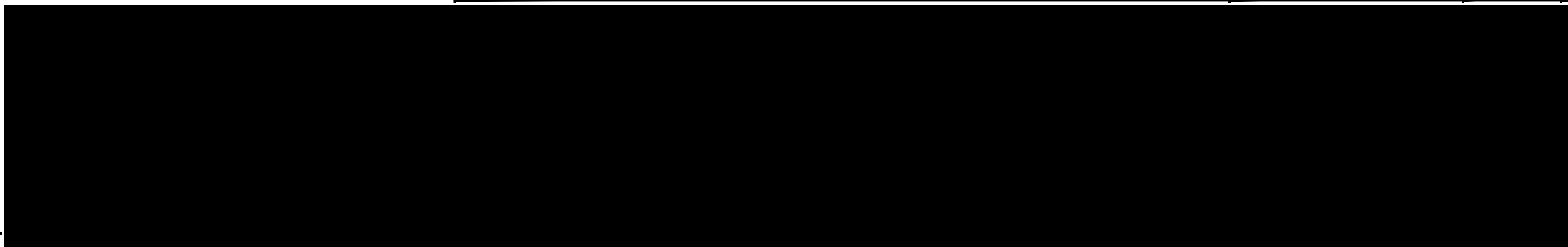


MPS-C-102-42

REV.  
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PRELIMINARY  
NOT FOR CONSTRUCTION



MILL POINT SOLAR I PROJECT  
CONNECTGEN MONTGOMERY COUNTY LLC  
SITE AND GRADING PLAN

GLEN

NEW YORK

03/01/2023  
DATE  
1" = 100'  
SCALE



MPS-C-102-43

REV.  
A

**Steinwachs, Erin**

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**From:** Steinwachs, Erin  
**Sent:** Tuesday, December 19, 2023 3:28 PM  
**To:** Darren Bonaparte  
**Cc:** Schreyer, Jessica (PARKS); 'Kala Laughlin'; Andrew Barrett; Sara, Tim; Kondak, Tegan  
**Subject:** Project (21PR00133) Outreach: Mill Point Solar I Project/250 MW/3500 Acres  
**Attachments:** Mill Point Solar I Addendum I Phase IB Report with Cover and Appendices 9-25-23.pdf;  
Avoidance Plan Memo with Attached Avoidance Plans to OPRHP 12-12-23.pdf

Dear Mr. Bonaparte,

Attached are the Phase IB Addendum I Archaeological Survey Report and Avoidance Plan for the Mill Point Solar I Project (21PR00133) in Montgomery County. If you would like to provide comments, please send them to Kristy Primeau at [Kristy.Primeau@ores.ny.gov](mailto:Kristy.Primeau@ores.ny.gov) and CC Jessica Schreyer at [Jessica.Schreyer@parks.ny.gov](mailto:Jessica.Schreyer@parks.ny.gov) for OPRHP records.

Thank you,  
Erin Steinwachs

**Erin Steinwachs, MA, RPA**  
Archaeologist/Lab Director



4425-B Forbes Blvd, Lanham, MD 20706  
O 301-306-6981 | C 202-731-7300 | [esteinwachs@trccompanies.com](mailto:esteinwachs@trccompanies.com)  
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](http://TRCcompanies.com)



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

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

December 21, 2023

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

Re: ORES  
Mill Point Solar Project/250 MW/3500 Acres  
Town of Glen, Montgomery County, NY  
21PR00133

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 *Mill Point Solar I Project (21PR00133) Archaeological Site Avoidance Plan* Memo (TRC, December 12, 2023). The Plan documents that archaeological sites [REDACTED] will be avoided by the revised project design and additional measures will be taken during construction to protect the sites from inadvertent impacts. We recommend that no further archaeological work is necessary for these sites.

If you have any questions, I can be reached at [Jessica.Schreyer@parks.ny.gov](mailto:Jessica.Schreyer@parks.ny.gov).

Sincerely,

Jessica Schreyer  
Archaeology Unit Program Coordinator



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

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

December 22, 2023

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

Re: ORES  
Mill Point Solar Project/250 MW/3500 Acres  
Town of Glen, Montgomery County, NY  
21PR00133

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.

Based on our review, it is the opinion of the OPRHP that no properties, including archaeological and/or historic resources, listed in or eligible for the New York State and National Registers of Historic Places will be Adversely Impacted by this project with the condition that the Archaeological Site Avoidance Plan (TRC, December 12, 2023) is adhered to.

If you have any questions, I can be reached at [Jessica.Schreyer@parks.ny.gov](mailto:Jessica.Schreyer@parks.ny.gov).

Sincerely,

A handwritten signature in cursive script that reads "Jessica E. Schreyer".

Jessica Schreyer  
Archaeology Unit Program Coordinator