



Parks, Recreation and Historic Preservation

ANDREW M. CUOMO
Governor

ROSE HARVEY
Commissioner

July 23, 2018

Michael Cinquino, Ph.D., RPA
Senior Vice President
Panamarican Consultants, Inc.
2390 Clinton Street
Buffalo, NY 12188-0189
(via email)

Re: ACE/PSC/DEC
Ball Hill Wind Energy Project/100 MW/29 Turbines/600 Feet
Towns of Villenova and Hanover, Chautauqua County
08PR01814

Dear Mr. Cinquino:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). We continue to review this undertaking in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/Cultural resources.

I have reviewed the new material that was submitted relating to the reduction in turbine numbers and change in unit scale. The reduction from 36 units (2016) to 29 is a significant change in the number of turbines in the landscape. However, the increase in individual unit height from just under 500 feet to 600 feet is a dramatic and significant change. As previously noted in my June 2016 letter, the introduction of sleek, ultramodern industrial wind turbines will and has had a significant impact on the rural landscape of the area. While this project has evolved from 60 turbines to 29 in the past decade, these new significantly larger units add to the roughly 80 turbines being constructed southwest of this undertaking at the Cassadaga and Arkwright projects.

At this point in time the NYSHPO does not believe that additional architectural survey work to assess new visual impacts associated with the taller units is necessary. However, we are concerned with the strong potential for cumulative impacts to the historic resources already affected by the previous wind projects in the south and southwestern portions of the APE.

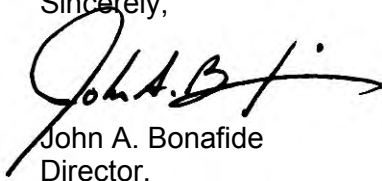
Regarding existing "modern intrusions" within the APE for this undertaking, water towers, silos, utility poles and other "vertical intrusions" evolve over time and are in scale with their surroundings. In many instances these structures have been in place for many decades and existed when the historic resources were identified. Modern wind turbines are massive (up to 60 stories), sleek ultra-modern kinetic industrial structures, which in scale and design are incongruous with rural surroundings.

As mitigation proposals are developed for this undertaking, please be cognizant of the heightened cumulative impacts to the affected resources and communities within the project's APE. The construction of this project will add to the 50 existing (or under construction) units associated with the Arkwright and Cassadaga wind projects.

Consultation for mitigation should be undertaken in coordination with the US Army Corps of Engineers as part of their Section 106 requirements. Once a mitigation plan is developed we would recommend that the Corps, along with the consulting parties, move to the development of a Memorandum of Agreement.

If I can be of any further assistance, please do not hesitate to contact me at (518) 268-2166 or john.bonafide@parks.ny.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Bonafide". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John A. Bonafide
Director,
Technical Preservation Services Bureau
Agency Historic Preservation Officer

cc: Molly Connerton, USACE *(via email)*
Andrew Davis, PSC *(via email)*
Charles Vandrei, DEC *(via email)*
NY-CRIS Notification List *(via email)*