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June 5, 2019

Erin Czernecki
New York State Division for Historic Preservation
Peebles Island Resource Center
One Delaware Ave North
Cohoes, NY 12047

Sent via email to: cris.web@parks.ny.gov

Subject: Visual Impact Survey Request – East Point Energy Center

Dear Ms. Czernecki,

This letter serves as an information request concerning the development of a proposed 50 MW solar energy center, the East Point Energy Center, in the town of Sharon, Schoharie County, New York, by East Point Energy Center, LLC (the Applicant), a subsidiary of NextEra Energy Resources, LLC. The Applicant plans to submit an Application to construct a major electric generating facility under Article 10 of the New York Public Service Law (PSL) for the Project. Pursuant to the rules of the New York State Board on Electric Generation Siting and the Environment (Siting Board), applicants proposing to submit an Application under Article 10 of the PSL must submit a Public Involvement Program (PIP) plan and solicit input to inform the development and review process.

Specifically, this letter request is in regards to the requirements of Sections 1001.20 b and 1001.24 b(4) of the PSL concerning Exhibit 20 (Cultural Resources) and Exhibit 24 (Visual Impacts) of the Application. As required for Exhibit 24, a Visual Impact Assessment (VIA) shall be provided to the Siting Board to determine the extent and assess the significance of facility visibility. The VIA will, in part, identify sensitive resource areas susceptible to visual changes from the proposed Project and present photographic simulations of the proposed Project's facilities in relation to selected viewpoints. The VIA also supports requirements for Exhibit 20, which takes into account sites or structures listed in or eligible for listing in the National or State Register of Historic Places (NRHP/SRHP).

Enclosed with this letter is a progress report on the VIA. It provides an overview of the work that has been done to date on the VIA including the status of visualization studies, site visits, preliminary analyses, and background information on the VIA process.

In compliance with Article 10 regulations, we are herein requesting your input as part of the Applicant's consultations with local historic preservation groups, Town of Sharon planning representatives, and State agencies, in its selection of important or representative viewpoints that may be subject to Project visibility.

Preliminary visual analyses and site investigations are in progress. The purpose of this letter and the enclosed Progress Report is to:

- Provide the reader with the extent and findings of visibility studies thus far, and

- Request the timely input from Town of Sharon planning representatives, local historic preservation groups, and other agencies in identifying any additional sensitive visual resources important to the community within the Project Study Area over what is provided herein, and/or,

- Provide opportunity for the Town of Sharon to suggest additional, representative, and reasonable candidate locations for photo-simulations (before and after depictions of Project) in areas of their concern. It should be noted this request is confined to areas with public access.

Please review the inventory of visual resources in Table 1 of the Progress Report for completeness.

Please also review the candidate simulation viewpoints listed in Table 2 and shown in Figure 1 and 3 in Attachment 2 of the enclosed Progress Report.

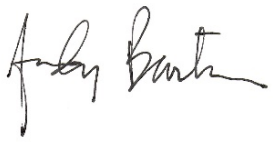
If you feel that the identified visual resources and candidate viewpoints provide an adequate representation of the Project for the purposes of preparing the VIA, no further action on your part is necessary. However, if there are other public locations of concern, currently not depicted, where you would like to suggest that additional representative photos be taken, or if there are any additional visual resources that are important to note, please provide your comments or feedback, with an explanation of why you feel that location/viewpoint should be included.

Any comments or feedback you may have are **requested by June 20, 2019** and should be sent to the following:

- Via email to:
  - Judy Bartos: JBartos@trccompanies.com
  - William Boer: William.Boer@nexteraenergy.com

Thank you for your attention to this request. We appreciate your input and assistance identifying significant sensitive visual areas.

Best regards,



Judy Bartos, Visualization Specialist
TRC Companies, Inc.

VISUAL IMPACT ASSESSMENT PROGRESS REPORT

East Point Energy Center

Case No. 17-F-0599

May 29, 2018

Contents

Tables

Attachments

1.0 Introduction

This is a progress report concerning the preparation of a Visual Impact Assessment (VIA) by East Point Energy Center, LLC, (EPEC, Project, or the Applicant) a wholly-owned indirect subsidiary of NextEra Energy Resources, LLC (NEER) in support of plans to submit an application to construct a major electric generating facility under Article 10 of the Public Service Law (PSL).

As required for Exhibit 24 (per Article 10 Section 1001.24 b(4), a Visual Impact Assessment (VIA), must be provided to determine the extent, and assess the significance, of facility visibility. Components of the VIA shall include "identification of visually sensitive resources, viewshed mapping, confirmatory visual assessment fieldwork, visual simulations, cumulative visual impact analysis, and proposed visual impact mitigation."

Article 10 regulations require both general and specific consultations with affected agencies and municipalities. As a further requirement, the Applicant shall confer with local historic preservation groups, municipal planning representatives, NYS Department of Public Service (DPS), NYS Department of Environmental Conservation (DEC) and NYS Office of Parks, Recreation and Historic Preservation (OPRHP) in its selection of important or representative viewpoints that may be subject to project visibility.

1.1. INFORMATION REQUEST

Preliminary visual analyses and site investigations are in progress. An informational request letter has been distributed along with this Progress Report in order to:

1. Provide the reader with the extent and findings of visibility studies thus far, and

2. Request the timely input from local historic preservation groups, Town of Sharon planning representatives, DPS, DEC and OPRHP (no later than June 14, 2019) in identifying any additional sensitive visual resources important to the community within the project study area over what is provided herein, and/or

3. Provide opportunity for Town of Sharon planning representatives, DPS, DEC and OPRHP to suggest additional, representative and reasonable candidate locations for photo-simulations (before and after depictions of project) in areas of their concern. It should be noted this request is confined to areas with public access.

The viewpoint selection process to determine a location for a photo-simulation considers several factors which are discussed in the following sections:

- Conducting an inventory of sensitive visual receptors in a project study area, to be incorporated into a Geographic Information Systems (GIS) database.
- Evaluating and defining Landscape Similarity Zones, which are landscape classifications specific to the study area.
- Defining Distance Zones, which determine level of discernible detail.

- Conducting a viewshed analysis which depicts the potential for project visibility over a larger regional area.
- Site visits and other means of determining open unobstructed views towards the project.
- Considering viewer sensitivity levels which may weigh one area over another such as viewer context, duration of view, and viewer types.

2.0 Project Overview

The East Point Energy Center Project will have a generating capacity of 50 MW of power and will be located on land either leased or purchased from owners of private property located in the Town of Sharon, Schoharie County, New York. Please see Figure C-001 in Attachment 1 for a preliminary site plan. Project facilities will include commercial-scale solar arrays, access roads, buried (and possibly overhead) electric collection lines, and electrical interconnection facilities. Interconnection facilities will include a 69-kV switchyard which will be transferred to National Grid to own and operate. The proposed collection substation and interconnection facilities will be located on land within the Project Area, in relative proximity to National Grid's existing Sharon – Marshville 69 kV transmission line, which is adjacent to the existing Sharon substation.

3.0 Status of Visualization Studies

Prior to any investigation for visual analyses a project study area must be defined. For the investigations herein, a 5 mile radius has been applied as a visual study area (VSA).

As of this writing, the engineering / project layout for specific solar array locations is still being modified and is not yet finalized. To avoid a continually changing study area due to panel re-location, the current study area includes a 5 mile VSA surrounding the Project Area as opposed to a radius around all facility components. In this sense, the initial investigations can focus on resources within a static non-changing limit while the engineering may continue to change.

The VSA primarily includes Schoharie County but extends into Montgomery County to the north and Otsego County to the west.

The Project is proposed in the Town of Sharon. However, the 5 mile VSA includes the towns of: Canajoharie, Carlisle, Cherry Valley, Cobleskill, Root, Roseboom, Seward, and Sharon.

3.1. SITE VISITS

Prior to conducting site visits for the VIA, several computerized Geographical Information System (GIS) desktop analyses are performed which contribute to a more complete understanding of the visual landscape within the VSA. Site field visits are also necessary for ground-truthing and increasing the understanding of the visual environment. All of these study elements help to inform the VIA process and are subsequently used to determine potential candidate locations for photo-simulations.

In May 2018, TRC (on behalf of the Applicant) conducted site visits to acquire on-the-ground information and photographs to support the VIA and the photo-simulation site selection process. To date, photo

location viewpoints are shown in Figures 1-3 in Attachment 2. A photo log of the viewpoints can be found in Attachment 3.

3.2. LANDSCAPE SIMILARITY ZONES

Landscape Similarity Zones (LSZ) are areas of similar landscape/aesthetic character based on patterns of landform, vegetation, water resources, land use, and user activity. These zones are required by Article 10 and provide additional context for evaluating viewer circumstances and visual experiences within the study area. Land cover classification datasets from the 2011 USGS National Land Cover Dataset (NLCD) are available for GIS analysis and were used for an initial establishment of LSZs as they provide distinct and usable landscape categories. These NLCD land cover groupings were then refined based on aerial photo interpretation and field review. This effort resulted in the definition of three LSZs within the VSA, including the following:

1) Agricultural/Open Land

2) Forested

3) Developed (village, town, city, rural residential along roadways, and transportation corridors)

The dominant LSZ consists of Zone 1 agricultural parcels interspersed with Zone 2 forest groupings as presented in Figure 2, Attachment 2. The landscape within the VSA is primarily a rural mix of farmland consisting of cultivated crops and hay-pasture land with small intermittent and isolated forest groups, many of which serve as vegetated riparian zones for local streams. Larger tracts of forested areas become more predominant near the western boundary of the VSA in Cherry Valley and Roseboom. More intensively established Zone 3 areas consist mainly of small village type enclaves with smaller population densities such as Sharon Springs.

3.3. DISTANCE ZONES

Distance Zones (required by Article 10) are Project distances to an observer. Three distance zones are applied to the Project: 1) foreground at 0.5 miles, 2) middleground 0.5 to 2.0 miles, and 3) background. 2.0 to 5.0 miles and are noted in Attachment 2 maps. Each of these areas determine the level of detail and acuity of objects. The effects of distance are highly dependent on the characteristics of the landscape, however size, level of visibility perceived for this particular type of project (solar panels) and panel position in the landscape should also be considered in determining zones. Solar panels are not wind turbines or tall buildings and are of a different character with a low height profile (usually no greater than 13) feet in comparison to other larger objects found in the landscape such as houses, barns, and trees in addition to the rolling topography in the area that could easily act as a visual obstruction for locations farther out. Distance Zones for this Project have been reasonably applied to accommodate the VSA radius, limitations of human vision and perceptible detail, and low profile of the Project components.

3.4. VISUAL RESOURCES INVENTORY

Prior to discussion of any visual changes to the landscape, sensitive resource areas susceptible to potential visual impacts must be identified. Visual resources reviewed within the 5 mile VSA included areas such as:

- Historic properties listed in the NRHP/SRHP;
- Lands such as national parks and forests, state forest preserves, national wildlife refuges; national landmarks, state parks and preserves, local parks;
- Scenic by-ways;
- Rivers designated (or eligible) as national or state wild, scenic or recreational;
- A state or federally designated trail, or one proposed for designation, bikeways, and snowmobile trails;
- An inventory of additional visual resources including scenic easements, recreation areas, and scenic districts, roads, overlooks, high use public areas; and
- Sensitive local community resources or local areas of concern.

The results of the inventory are presented in Table 1.

Source information for the development of the inventory included research for GIS data available on federal, state, or agency websites, or other non-GIS based websites such as local county planning sites, chambers of commerce, recreational departments that provided information such as listings or hardcopy maps.

Table 1. Preliminary Inventory of Visual Resources within Five Miles

Resource Name	Town	Distance Zone	LSZ	Expected Visibility
Federal/State/Local Recreation Lands				
Bowmaker Pond	Sharon	2	1,2	No
Sharon Springs Recreation Center	Sharon Springs	2	1,2	No
Honey Hill State Forest	Roseboom, Sharon	3	2	No
Scenic Byways				
New York State Route 20 Scenic Byway	Carlisle, Cherry Valley, Sharon	1,2,3	1,2,3	Yes
Local Excursion from Scenic Byway 20	Sharon	2	1,2,3	No
Scenic Rd according to Sharon Comp Plan	Sharon	1,2,3	1,2,3	Yes
Heritage Areas				
Mohawk Valley Heritage Area - Schoharie and Montgomery Counties		1,2,3	1,2,3	Yes
Conservation Easements				

Resource Name		Town	Distance Zone	LSZ	Expected Visibility
Federal Held by NRCS (10 parcels)		Canajoharies (2), Root (3), Roseboom (2), Seward (2), Sharon (1)	1,2,3	1,2	No
NGO Held by Schoharie Trust (2 parcels)		Sharon	2,3	1,2	No
Snowmobile Trails					
Various, unnamed trails (Clubs: Sharon Pathfinders, Cave Country Riders)		Canajoharie, Carlisle, Cherry Valley, Cobleskill, Root, Roseboom, Seward, Sharon	1,2,3	1,2,3	Yes
Historic NRHP					
5743.000011	Ames Academy Building	Canajoharie	3	3	No
9514.000001	Hilton, Peter A., House	Beekman Corners	2	1,3	No
9514.000023	St. John's Lutheran Church	Beekman Corners	2	1,3	No
9514.000025	John Lehman House	Sharon	2	1,3	No
9545.000136	Sharon Springs Historic District (includes 120 properties)	Sharon Springs	2	2, 3	No
Historic Eligible					
5702.000052	Mapletown Cemetery - Mapletown Road & Blaine Road	Canajoharie	3	1,2	No
5702.000156	Old Baptist Church Cemetery - Old Sharon Rd	Canajoharie	3	1	No
9514.000002	Beekman Mansion - 6725 State Route 10	Sharon	3	1	No
9514.000024	BIN 2263190 Hanson Crossing Bridge - Hanson Crossing Rd	Sharon	2	1,2	No
9514.000029	254 Buel Road	Sharon	3	1	No
9514.00003	130 Zeller Road	Sharon	3	1	No
9514.000031	375 Kilts Road	Sharon	2	1,2	No
9545.000133	514 State Highway 20	Sharon	3	3	No

3.5. VIEWSHED ANALYSIS

Landform and elevation in addition to vegetative features in the landscape are a key influence on the visibility and sightline of a project.

A viewshed analysis is a computerized GIS analytical technique that illustrates the predicted visibility that may potentially be expected for a project. It allows one to determine if and where an object, such as a solar array, can geographically be seen within a larger regional area. The viewshed model accounts for

topography, vegetation, and the maximum height of a solar panel which was set at 12 feet above ground level. The results of the viewshed analysis, typically displayed over a USGS topographic map or aerial photo, are combined with other sensitive location information such as historic places, national forests, or state parks, etc. (Table 1). Incorporating GIS integrated data along with a viewshed analysis assists in understanding the potential for project visibility at sensitive resource locations. Figures 1 and 3 in Attachment 2 presents the results of the viewshed analysis along with visual receptors listed in Table 1.

Assumptions and Limitations of the Viewshed Model

The viewshed analysis identifies cells (image pixels) that contain elevation information and computes the differences along the terrain surface between an observer at any point within the study area and a target (e.g. solar array).

The viewshed analysis is a valuable tool for predicting visibility. However, when reading the viewshed maps it is important to consider the limitations of the analysis. The analysis is a clear line of sight and therefore certain factors in the interpretation of results need to be considered:

- The model, because of its computerized aspect, assumes the observer to have perfect vision at all distances. Therefore, a certain amount of reasonable interpretation needs to be considered because of the limitations of human vision at greater distances or those atmospheric/meteorological conditions that may cause imperfect vision, such as haze or inclement weather. Additionally, an object is naturally smaller and shows much less detail at distances and will have less visual impact. These aspects concerning the quality of view cannot be conveyed with this analysis.

- Even though an area may show visibility, it does not mean the entirety of a project will be seen. The viewshed analysis depicts areas of visibility over a regional area. It can only predict geographically, on a map, areas where some part of the solar array might be seen. It does not, and cannot, determine if it is seeing a full on view or a partial view of the Project. Additionally, if visibility is occurring in an area, it may sometimes only be a result of glimpsing a portion of the Project over undulating treetops or between gaps of trees and not a full-on view. Likewise, there may be understory tree gaps not depicted by the vegetative layers where there may be visibility of a project.

- The viewshed model assumes that any vegetation is opaque and therefore represents a leaf-on condition. By nature of the software model and available parameters, the trees are treated as an opaque object and therefore leaf-on conditions are assumed. Transparency predictions through something similar to bare-branched trees under leaf-off conditions cannot be made.

- The model was developed with the assumption that a viewer would not see the Project if standing amongst trees in forested areas as outward views from within densely spaced trees is unlikely.

3.6. PHOTOSIMULATIONS

Photosimulations depicting existing conditions and what the project will look like are proposed. In May of 2018, site visits were made to obtain photos during leaf-off conditions in order to depict worse-case

scenario. A photolog showing the photos acquired during that site visit is in Attachment 3. Photo viewpoint locations are shown in Figures 1-3, Attachment 2. From the photolog, Table 2 shows the preliminary viewpoint locations that will be selected to produce simulations. Further discussion on viewpoint selection in relation to viewshed analysis results can be found in Section 5.0.

Table 2. Preliminary Photosimulation Candidate Locations

Current Viewpoint ID	Location	Landscape Similarity Zone	Comment
1*	Beech Rd	1, 3	Proximal views in farmland looking NW to NE.
2	Route 20	1, 3	Proximal views W to E from Scenic Route 20 and from major travel corridor.
3*	Route 20	1,3	View north from Scenic Route 20 looking towards proposed substation.
4	Slate Hill	1, (2), 3	Distant view towards project looking NW to N from agricultural land and residential road. View shows forested LSZ interspersed with farmlands.
10*	Gilberts Corners Rd	1, (2), 3	View from local road looking NW to SE in substantial open agricultural lands. View shows forested LSZ interspersed with farmlands.
11*	Empie Rd	1, (2), 3	Proximal view looking W to E in substantial open agricultural lands. View shows forested LSZ interspersed with and at periphery of farmlands.
12*	Gilberts Corners Road	1, 3	Proximal view from local road looking NW showing a different perspective of Project.
17*	Route 20	1,3	Proximal view from Scenic Route 20 looking S to NE showing travel corridor, agricultural land, and residential.

*These viewpoint locations as represented in the photolog are panoramic views comprised of 2 to 4 photos each. Because of the degree of expected visibility and numerous multi-angled views along the major local road, more than one simulation at each of these viewpoints will be likely be produced.

4.0 Additional Applicable Visual Concepts to Consider when Choosing Simulation Viewpoints: Viewer Sensitivity Levels

Visual sensitivity is dependent upon user or viewer attitudes, the amount of use and the types of activities in which people are engaged when viewing an object. Overall, higher degrees of visual sensitivity are correlated with areas where people live and with people who are engaged in recreational outdoor pursuits or participate in scenic driving. Conversely areas of industrial or commercial use are considered to have low to moderate visual sensitivity because the activities conducted are not significantly affected by the quality of the environment.

These concepts are applied when evaluating the visual landscape and assessing the importance of a viewpoint location if it falls in an area of visibility.

Viewer groups and associated responses to visual changes are analyzed from a variety of factors including:

Viewer group – Types of viewers will vary by geographic region, as well as by travel route or use areas, such as a developed recreation site, urban area, or back yard. Viewer groups include:

- *local constituency*: - People living in the local area and/or surrounding communities who interpret the significance of where they live and interact with others; these people may include local residents and members of groups to which the local area is important in different ways.
- *commuter constituency*: - People who use or are generally restricted to travel corridors that are destination oriented towards places of employment. These people generally have transient short duration views.
- *visitor or recreational constituency*: Individuals who visit the area to experience its natural appearance, cultural landscape qualities or recreational opportunities. Visitors may be of local, regional, or national origin.

Context of viewer - The viewer group and associated viewer sensitivity is distinguished among viewers in residential, recreational/open space, tourist commercial establishments, and workplace areas, with the first two having relative high sensitivity.

Number of viewers - The number of viewers is established by the amount of people estimated to be exposed to the view. In comparing viewing locations to each other, one can consider if the area is a high public use area or if it is a location that is less frequently visited or more inaccessible where the public is not expected to be present (such as marshes or swamps).

Duration of view - Duration of view is the amount of time a viewer would actually be looking at a particular site. Use areas are locations that receive concentrated public-use viewing with views of long duration such as residential back yards. Recreational long duration views include picnic areas, favorite fishing spots, campsites, or day use in smaller local parks. Comparatively, drivers, hikers, snowmobilers, or canoeists will likely encounter a shorter, more rapid transient experience as a person transitions from one linear segment to the next but will encounter more visually varied experiences.

Viewer activities - Activities can either encourage a viewer to observe the surrounding area more closely (hiking) or discourage close observation (commuting in traffic).

5.0 Discussion

The site plan in Attachment 1 shows the Project Area and the parcel limits that are available to construct the solar arrays. The viewshed analysis results (Figure 1 and 3, Attachment 2), or that area colored in pink, show areas of expected visibility. For the analysis, available Light Detection and Ranging (LiDAR) data was obtained from the New York State GIS Program website. LiDAR data is the best available elevation data as it includes high resolution accurate ground elevations in addition to building heights and individual tree heights that offer physical visual impediments. The top of the panels was set at 12 feet in height above ground surface and placed within the LiDAR tree and building modeling environment.

Carefully optimized and compacted siting reduces the usage of all available parcels where there could be more open views to the west and along Route 20 if all parcels were used. Current siting is optimized such that visual impacts to Route 20 are made more minimal by compacting the alignment to fewer available

parcels. Overall Project visibility is minimized as well, by choosing parcels that are framed by mature trees on 2 to 3 sides of an array grouping. Because of a 12 foot panel maximum height in relation to a mature forest group, there are minimal far reaching views outside of the general array locations. Those views that occur farther out to the extent of the VSA such as Crosby Road, Bear Swamp Road, and Carlisle Road are generally restricted to open land where the public is not expected to be.

There are few travel corridors that surround the arrays. Much of the proposed arrays are placed on "interior" farmland surrounded by trees where there is little exposure to local roads. As noted by the results, the most visibility is expected in the proposed farmland parcels themselves. There is expected visibility along a relatively short section of Scenic Route 20 as shown in the viewshed results, the east end of Beech Road near Route 20, along the open area at the northern end of Empie Road where there are several array groups proposed and along the segment of Gilberts Corners Road between Sharon Hill Road and Staleyville Road which is designated as a local scenic excursion off of Scenic Route 20. There are is no expected visibility to state forests or local parks, historic sites, or the historic district in Sharon Springs.

Visibility is not relatively extensive nor is visibility expected in most of the listed Table 1 visual receptors, save for snowmobile trails, segments of Scenic Route 20 and locally designated scenic roads to the north. This therefore limits the choice of numerous and diverse locations for photosimulations in publicly accessible locations. Attempts to have photo viewpoints represent all LSZs are typically made however obtaining photo viewpoints from a representative forested area is often moot, since there are not expected to be outward views from within a forested area. As well, recreational and public forest parcels that are near the project are expected to have views that are minimal to none. Nearly all forested area is private land. Most viewpoints then are taken in the remaining two but abundant LSZs which is agricultural open land and roads. However, forest groups can be seen in several of these photos. Several photos shown in the photolog taken farther out and at slightly higher elevations cannot be used as there will likely be no views such as from VP 13 and 14, but this will be verified within the 3d visualization software. Also, several photos such as VP 5, 6, 7, and 15 cannot be used as panels are not proposed on these parcels. Photos were taken there in the event the parcels might have been used. Therefore, the VPs that would show the Project the most are along Route 20, Empie Road, and Gilberts Corners Roads and are chosen as candidate locations as listed in Table 2. These locations are expected to have multiple viewing angles in front and around and in back of the viewer.

ATTACHMENT 1

SITE PLAN

DRAFT/
PRELIMINARY -
SITE PLAN
SUBJECT TO
CHANGE

800 0 800 1600 FT

SCALE: 1" = 800'

PRELIMINARY
NOT FOR CONSTRUCTION

Call 811 Before You Dig

TRC
249 Western Avenue
Agusta, ME 04330

PROJECT NO: 327851

REFERENCE ITEMS	REV	DESCRIPTION	DATE	DES	CHK	APP
	A	ISSUED FOR CLIENT REVIEW	04/17/19	CMW	PMM	

PDT DESIGNED
ESB DRAWN
CHECKED
APPROVED
REVIEW 1
REVIEW 2
04/08 DATE
AS NOTED SCALE

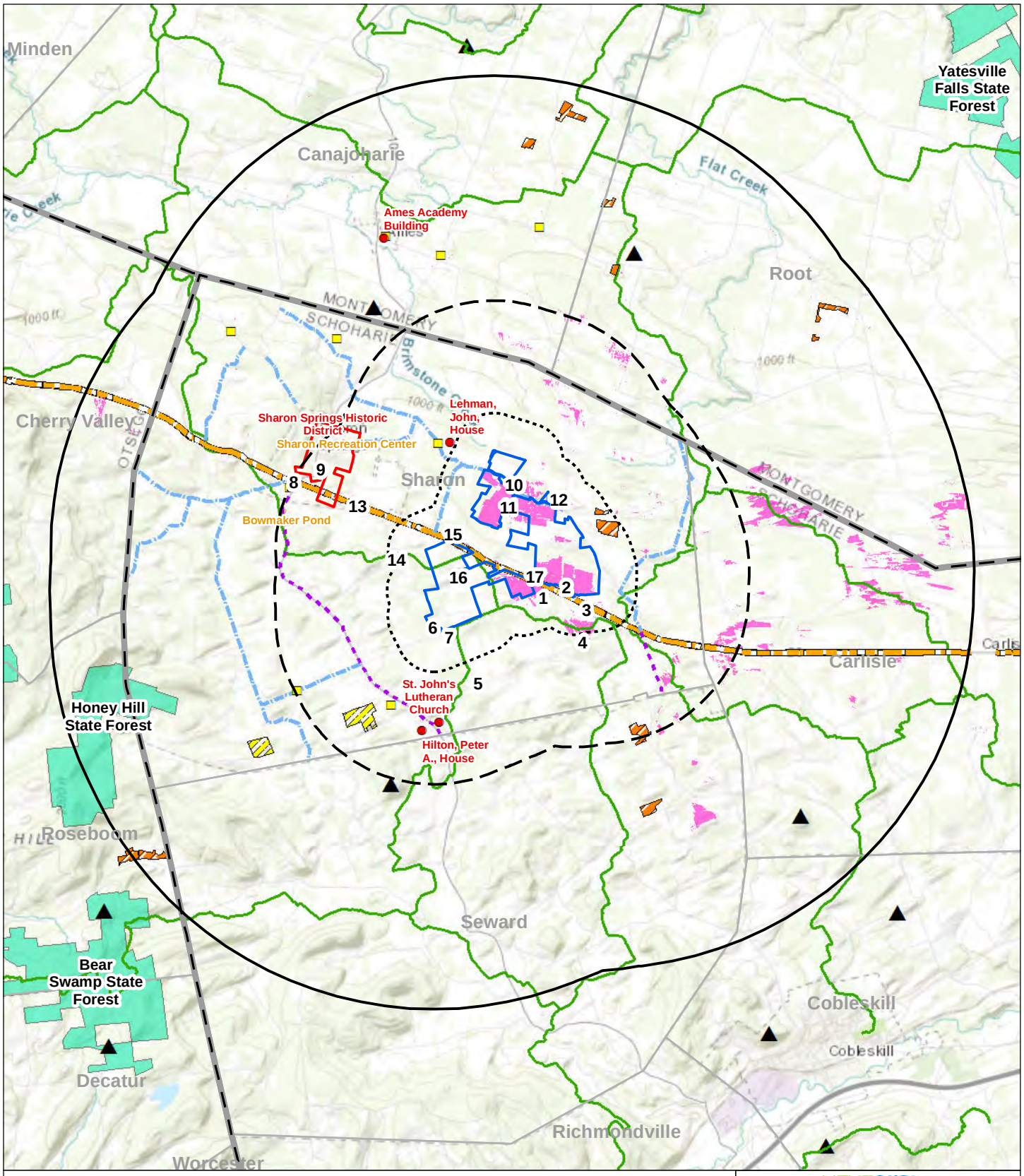
PRELIMINARY
OVERALL SITE LAYOUT
EAST POINT ENERGY CENTER
EAST POINT ENERGY CENTER, LLC
SHARON SCHOHARIE CO., NY

TRC C-001 REV. A

327851-EAST POINT-C-001-TOWN.dwg 2019.05.21

ATTACHMENT 2

MAPS



1 Photo Viewpoint May 2018
Predicted Visibility
Project Area
National Register of Historic Places Sites
Eligible Historic Sites
Historic District
NYS Route 20 Scenic Byway
Snowmobile Trail
Federal-State-County Recreation

High Point Location
Local Park

LOCAL SCENIC ROAD
Excursion from Scenic Byway
Scenic Rd listed in Sharon Comp Plan

CONSERVATION EASEMENT
Federal
Schoharie Land Trust

DISTANCE ZONES
Half Mile Radius
Two Mile Radius
Five Mile Radius

N

0 1 2 Miles

Note: The Project and VSA lie within the Schoharie County Heritage Area

NEXTera ENERGY

OVERVIEW MAP WITH VISUAL RESOURCES

EAST POINT ENERGY CENTER
TOWN OF SHARON, NY

FIGURE 1	MAY 2019

Map Produced by TRC

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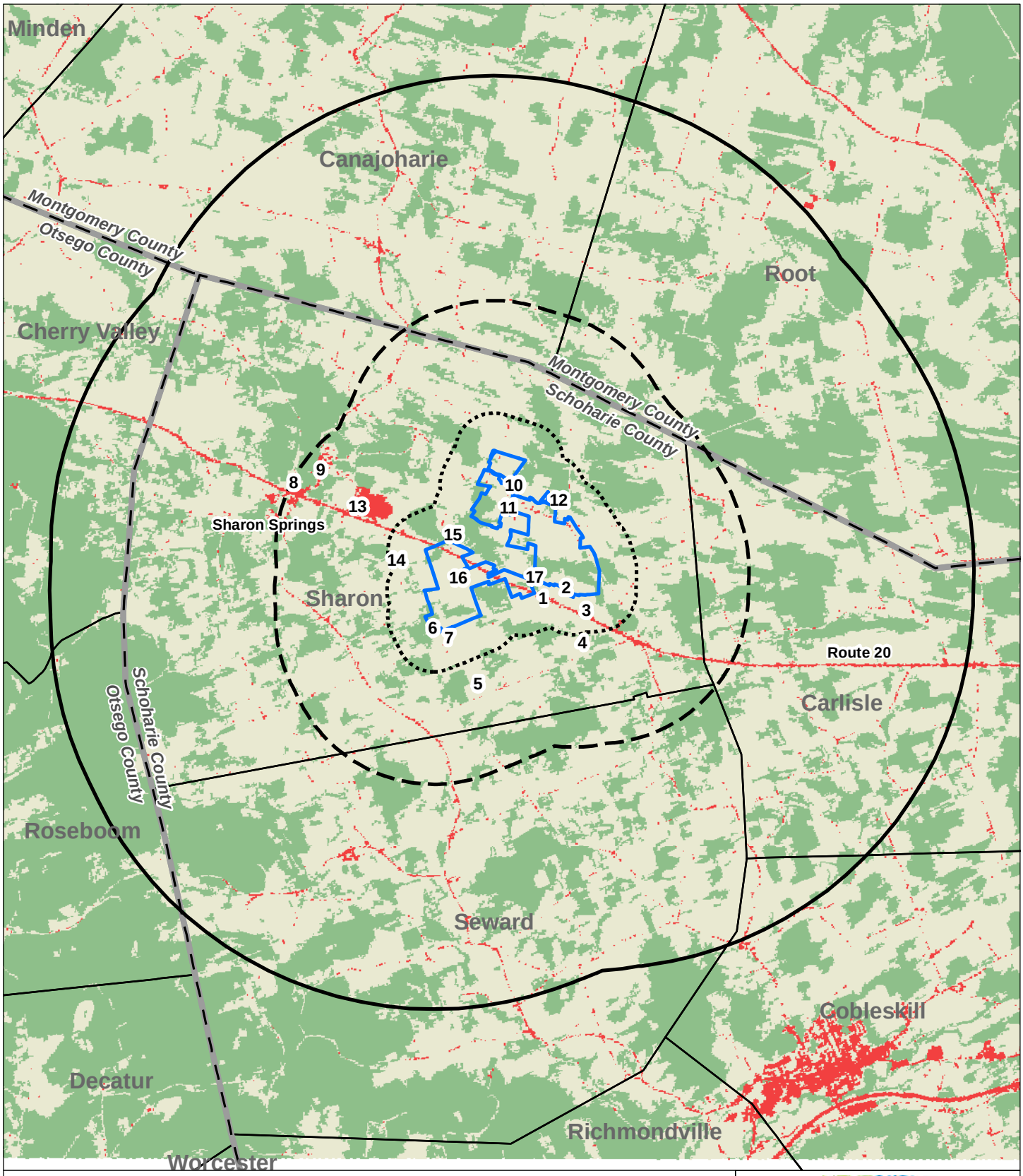

1 Photo Viewpoints May 2018
Project Area
Half Mile Radius
Two Mile Radius
Five Mile Radius

LANDSCAPE SIMILARITY ZONES
Agricultural/Open Land
Forest
Developed

N

0 1 2 Miles

NEXTera ENERGY

LANDSCAPE SIMILARITY ZONES

EAST POINT ENERGY CENTER
TOWN OF SHARON, NY

FIGURE 2	MAY 2019

Map Produced by TRC

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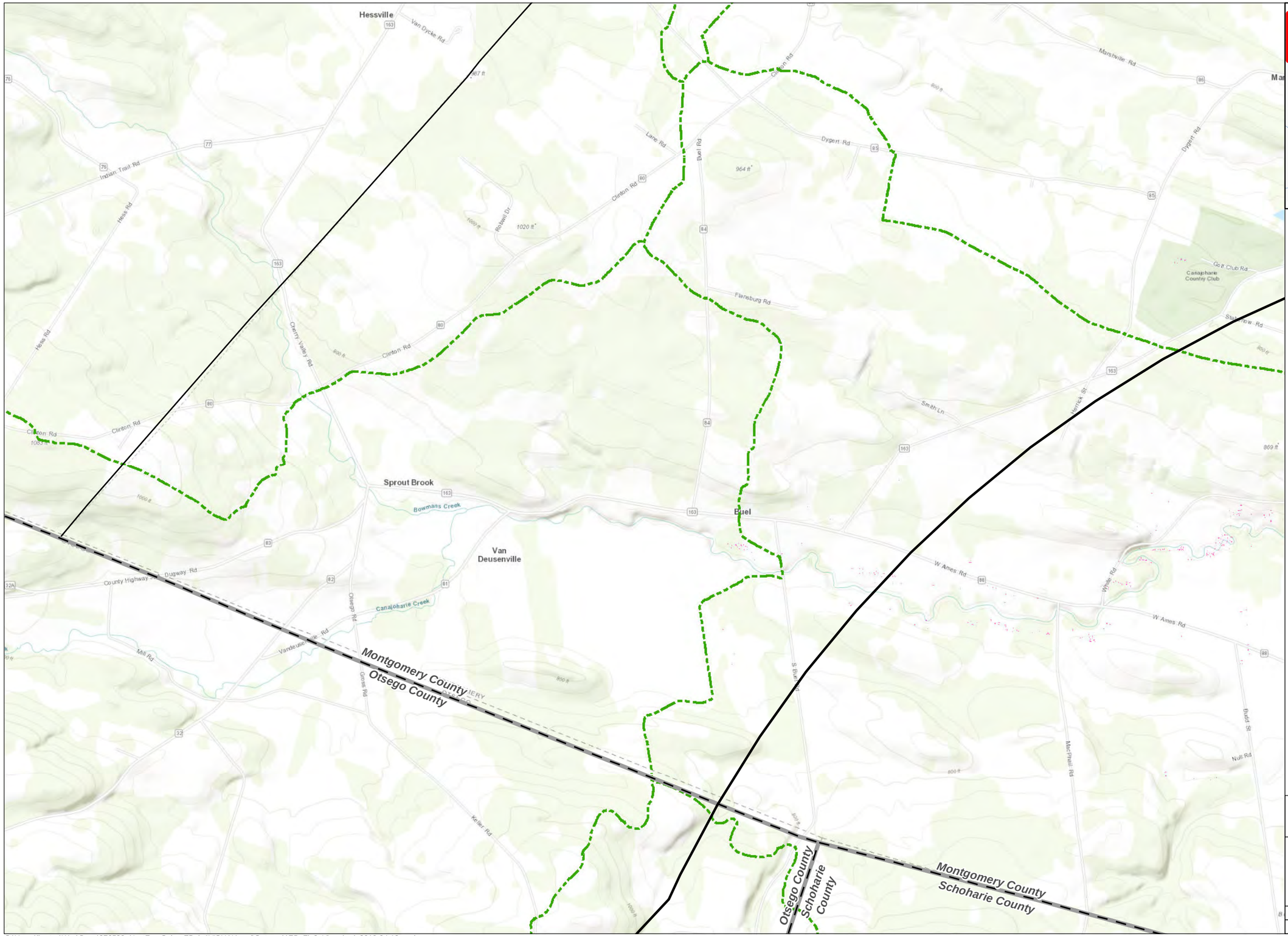

A1	**A2**	**A3**
B1	**B2**	**B3**
C1	**C2**	**C3**
D1	**D2**	**D3**

- Photo Viewpoint May 2018
- Project Area
- Predicted Visibility
- Proposed Solar Array
- National Register of Historic Places Site
- Historic District
- Eligible Historic Sites
- NYS Route 20 Scenic Byway
- Snowmobile Trail
- Federal-State-County Recreation
- High Point Location
- Local Park

LOCAL SCENIC ROAD

- Excursion from Scenic Byway
- Scenic Rd listed in Sharon Comp Plan

CONSERVATION EASEMENT

- Federal
- Schoharie Land Trust

DISTANCE ZONES

- Half Mile Radius
- Two Mile Radius
- Five Mile Radius

Map Page A1

N

0 2,000 Feet

NEXTera ENERGY

PRELIMINARY VIEWSHED ANALYSIS

EAST POINT ENERGY CENTER
TOWN OF SHARON, NY

FIGURE 3	MAY 2019

Map Produced by TRC

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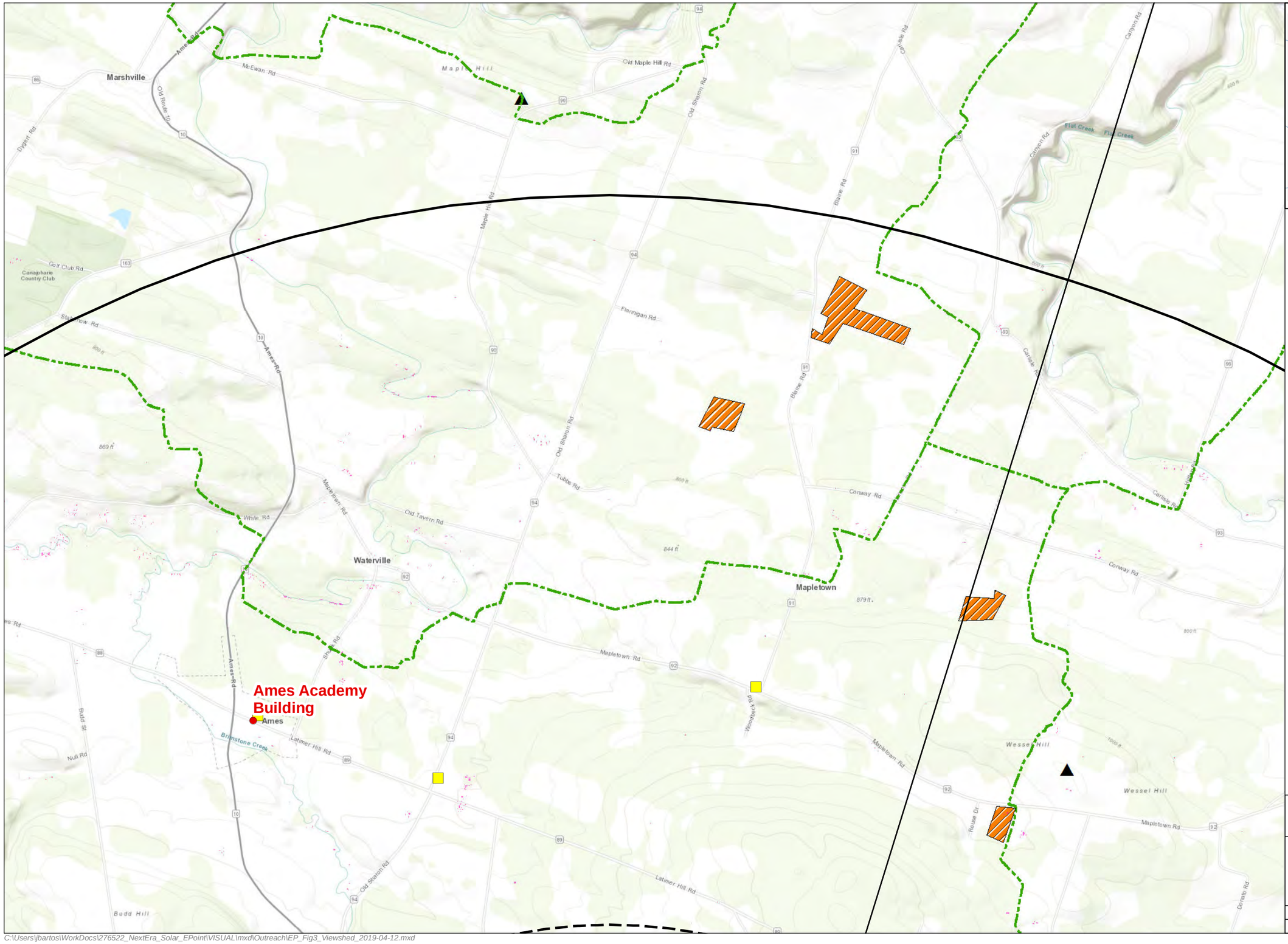

A1	A2	A3
B1	B2	B3
C1	C2	C3
D1	D2	D3

- Photo Viewpoint May 2018
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- High Point Location
- Local Park

LOCAL SCENIC ROAD

- Excursion from Scenic Byway
- Scenic Rd listed in Sharon Comp Plan

CONSERVATION EASEMENT

- Federal
- Schoharie Land Trust

DISTANCE ZONES

- Half Mile Radius
- Two Mile Radius
- Five Mile Radius

Map Page A2

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0 2,000 Feet

NEXTera ENERGY

PRELIMINARY VIEWSHED ANALYSIS

EAST POINT ENERGY CENTER
TOWN OF SHARON, NY

FIGURE 3	MAY 2019

Map Produced by TRC

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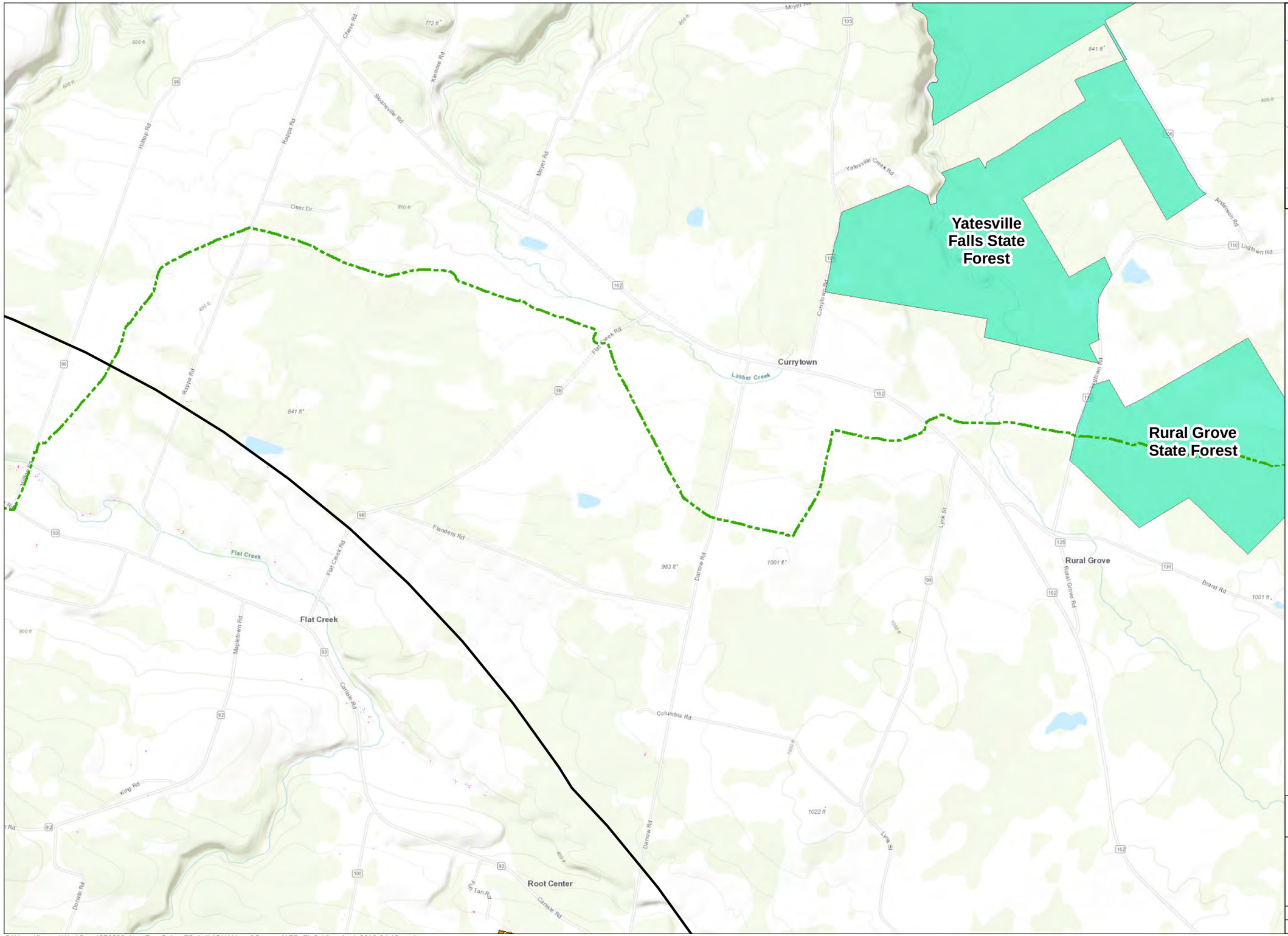

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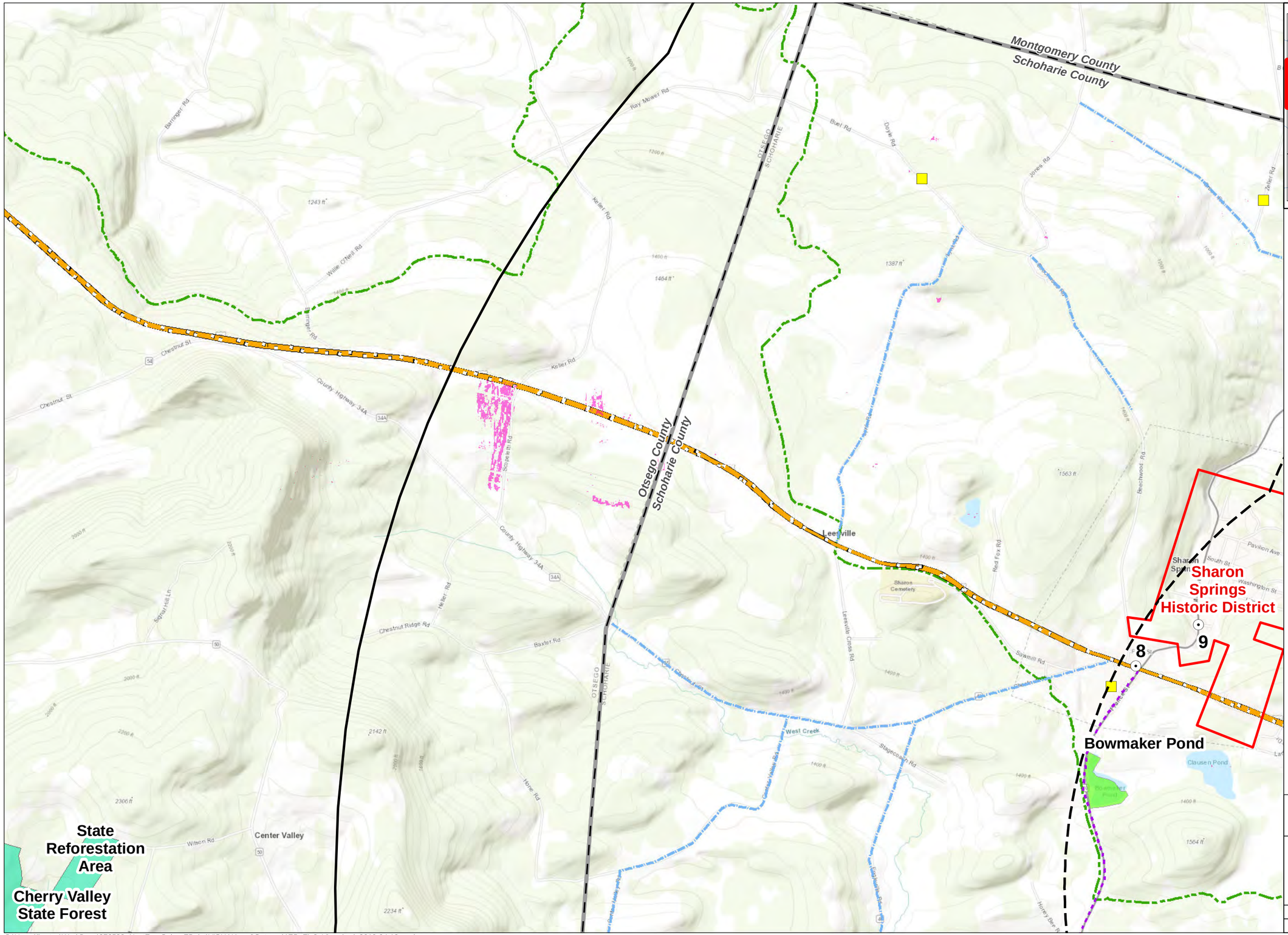

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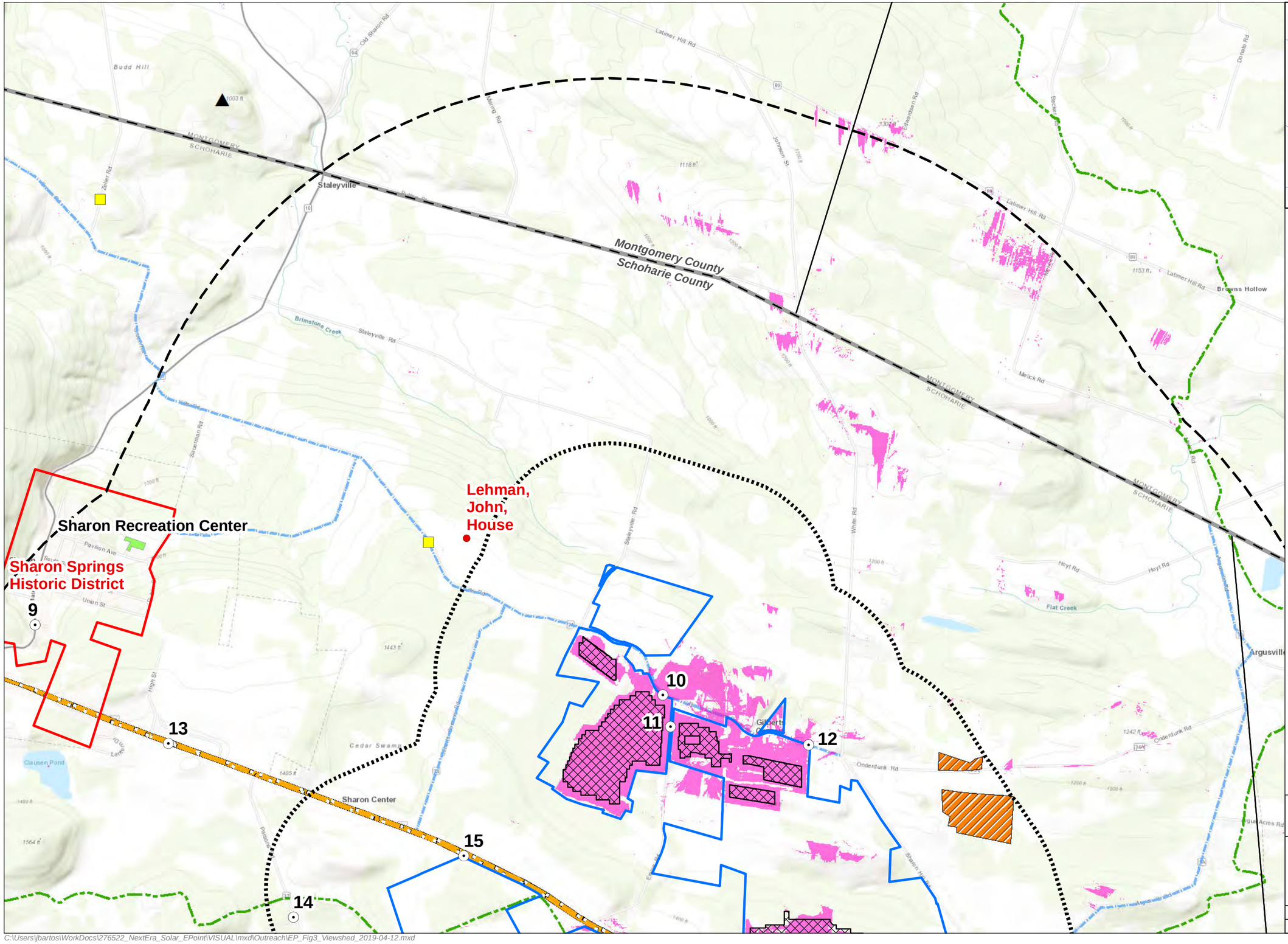

A1 | A2 | A3
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PRELIMINARY VIEWSHED ANALYSIS

EAST POINT ENERGY CENTER
TOWN OF SHARON, NY

FIGURE 3 | MAY 2019

Map Produced by TRC

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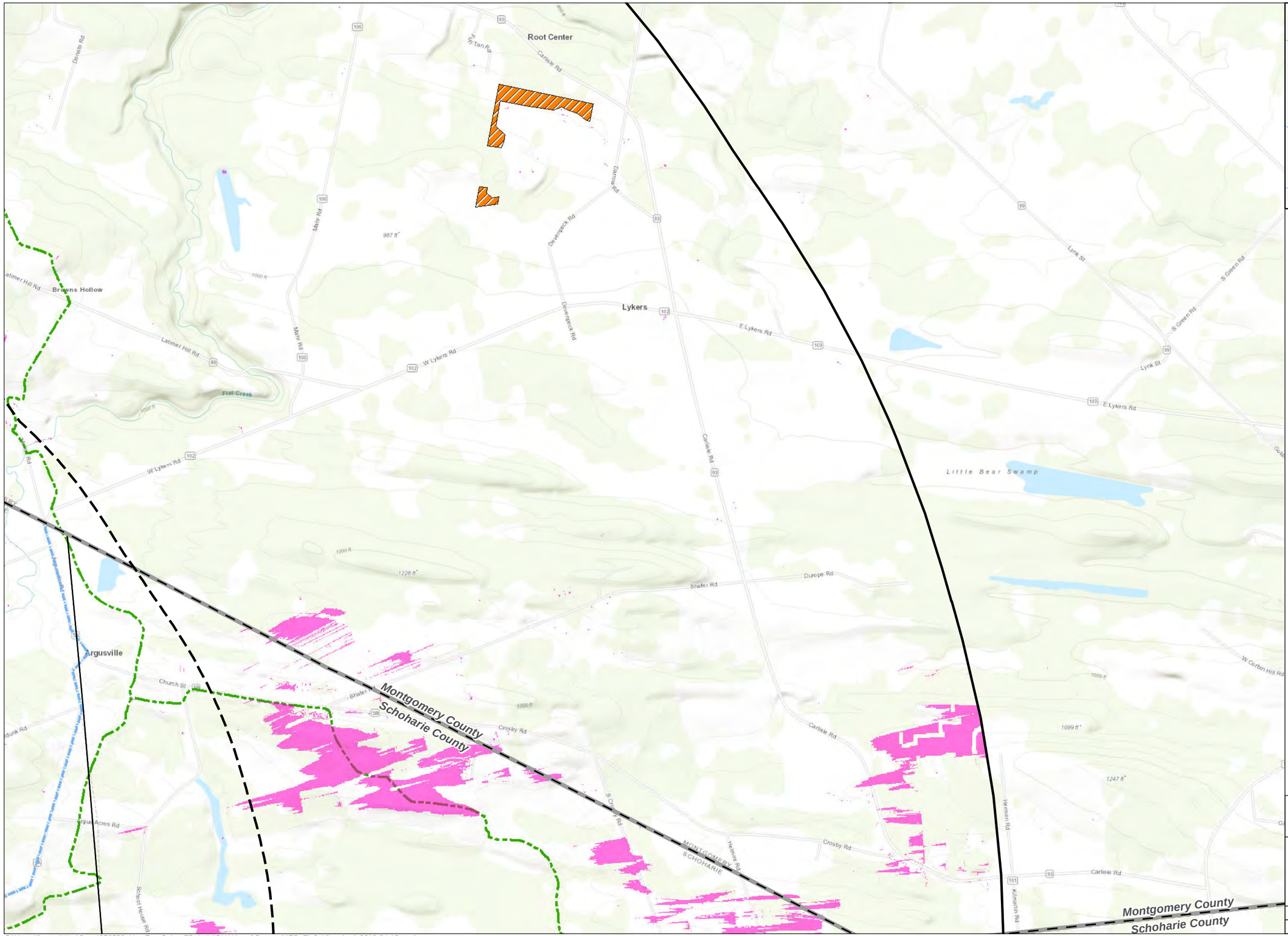

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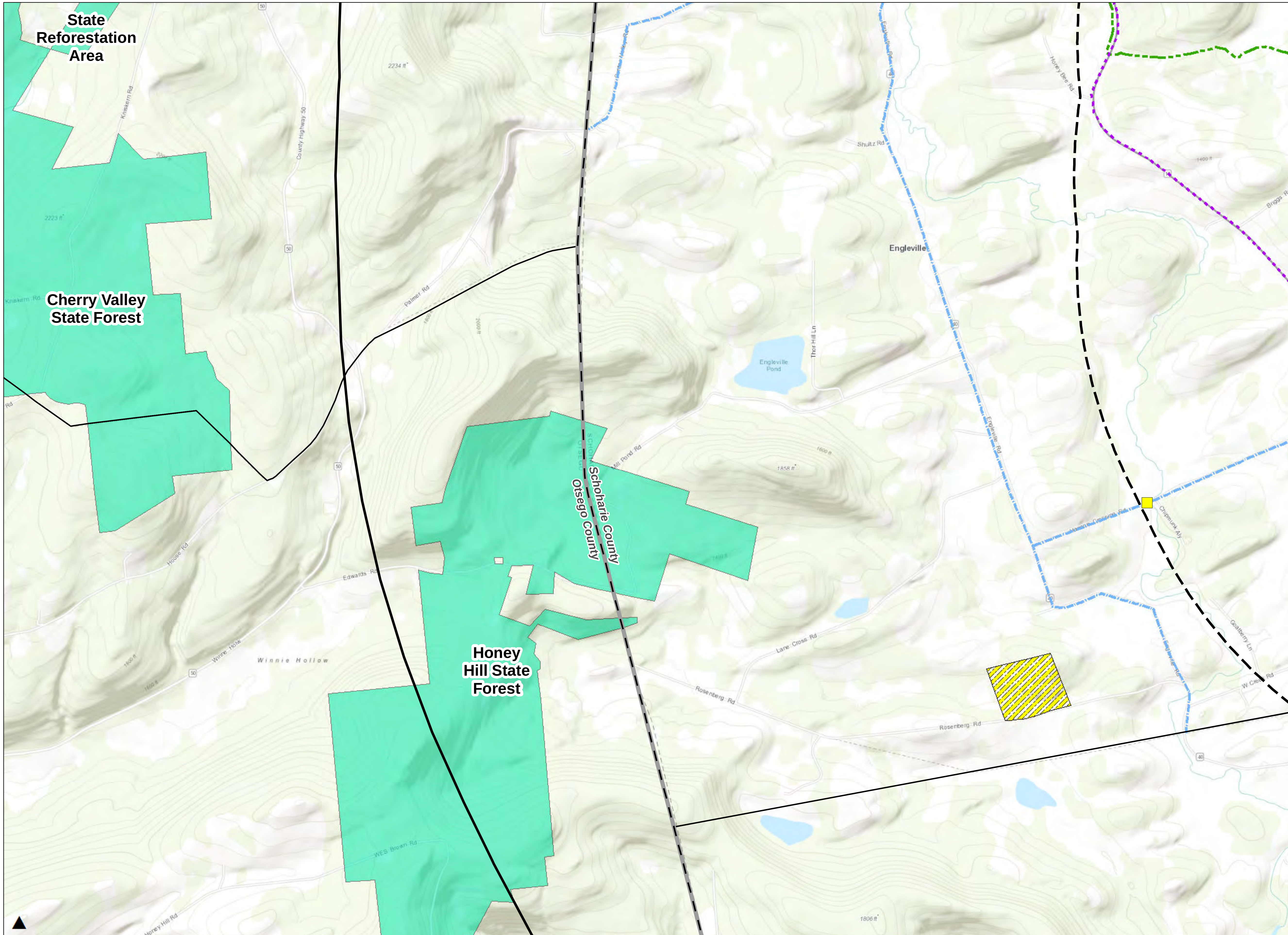

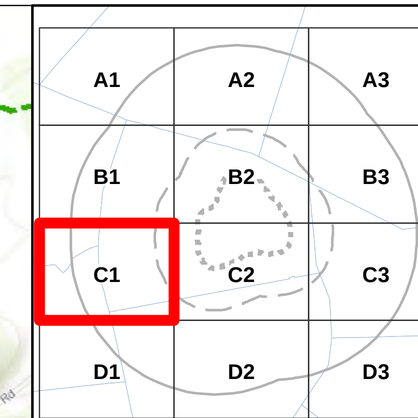

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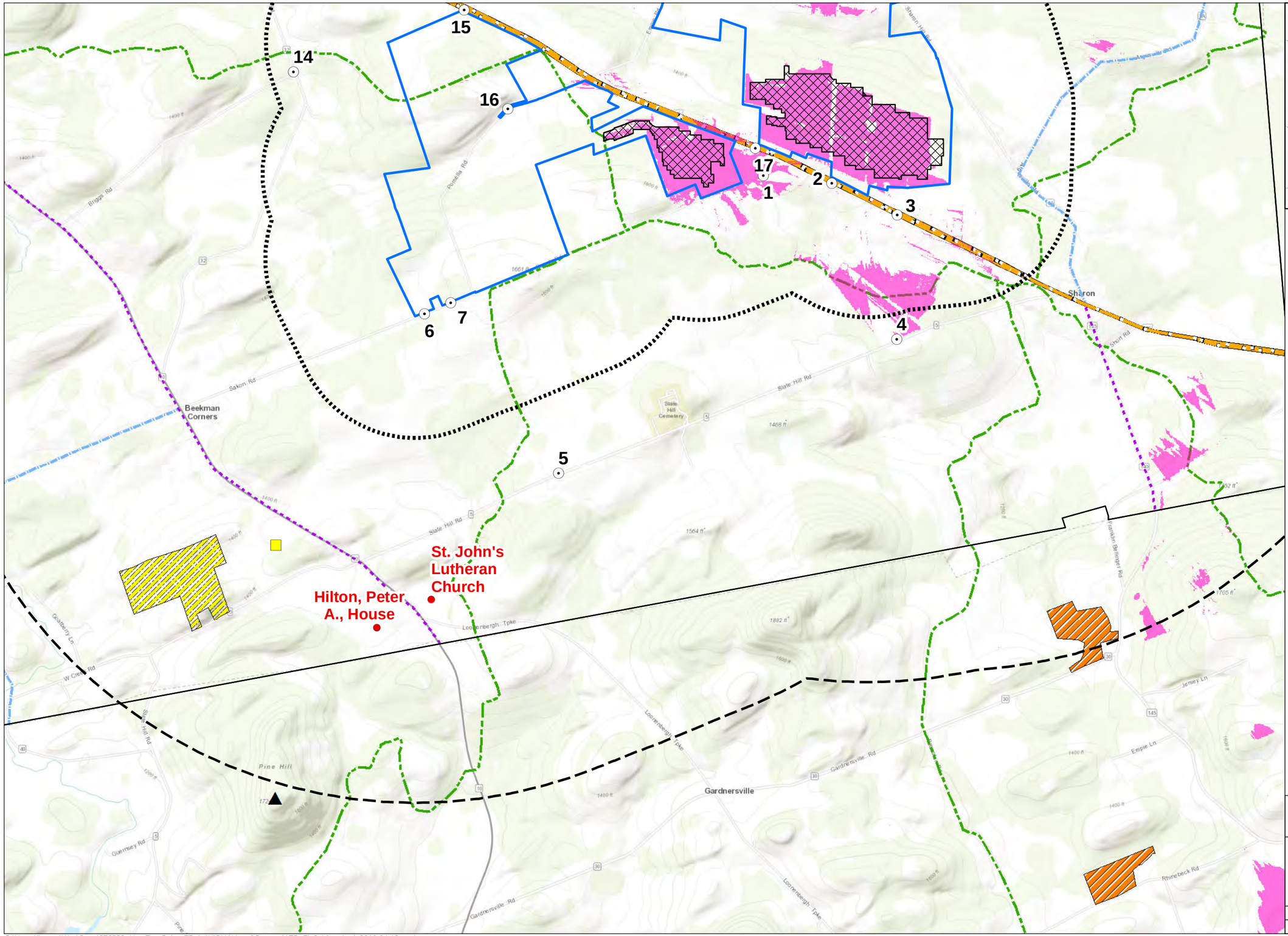

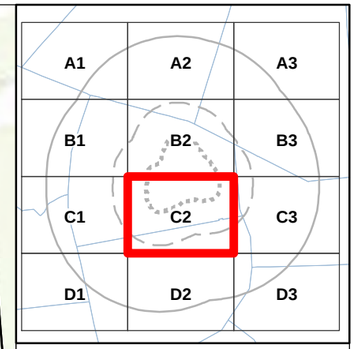

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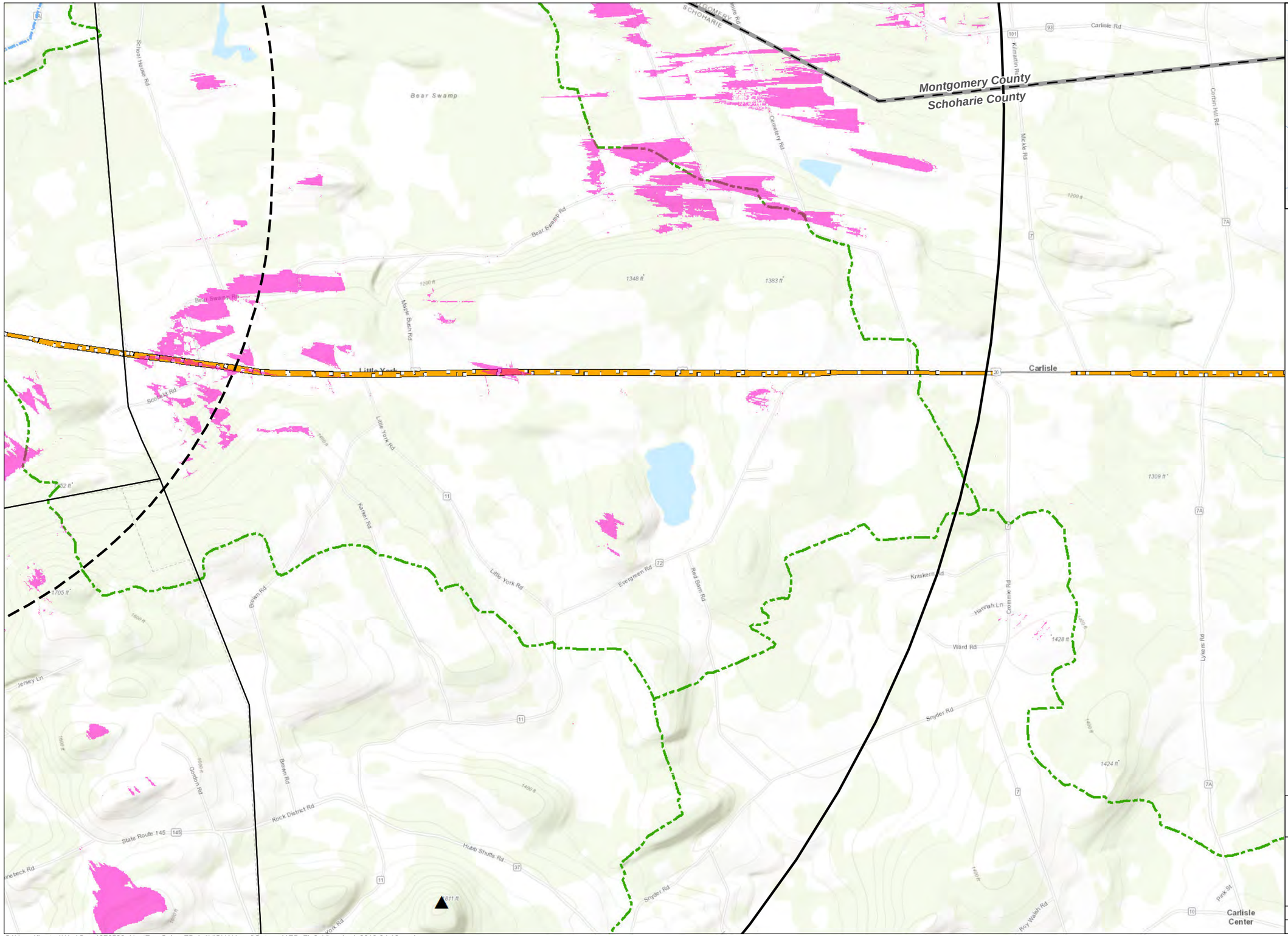

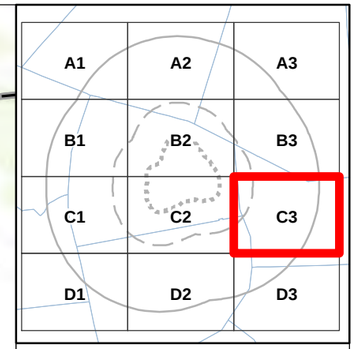

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Honey Hill State Forest

Women's Community Club of South Valley

Bear Swamp State Forest

Weber Corners

Dorloo

Schoharie County
Otsego County

A1	A2	A3
B1	B2	B3
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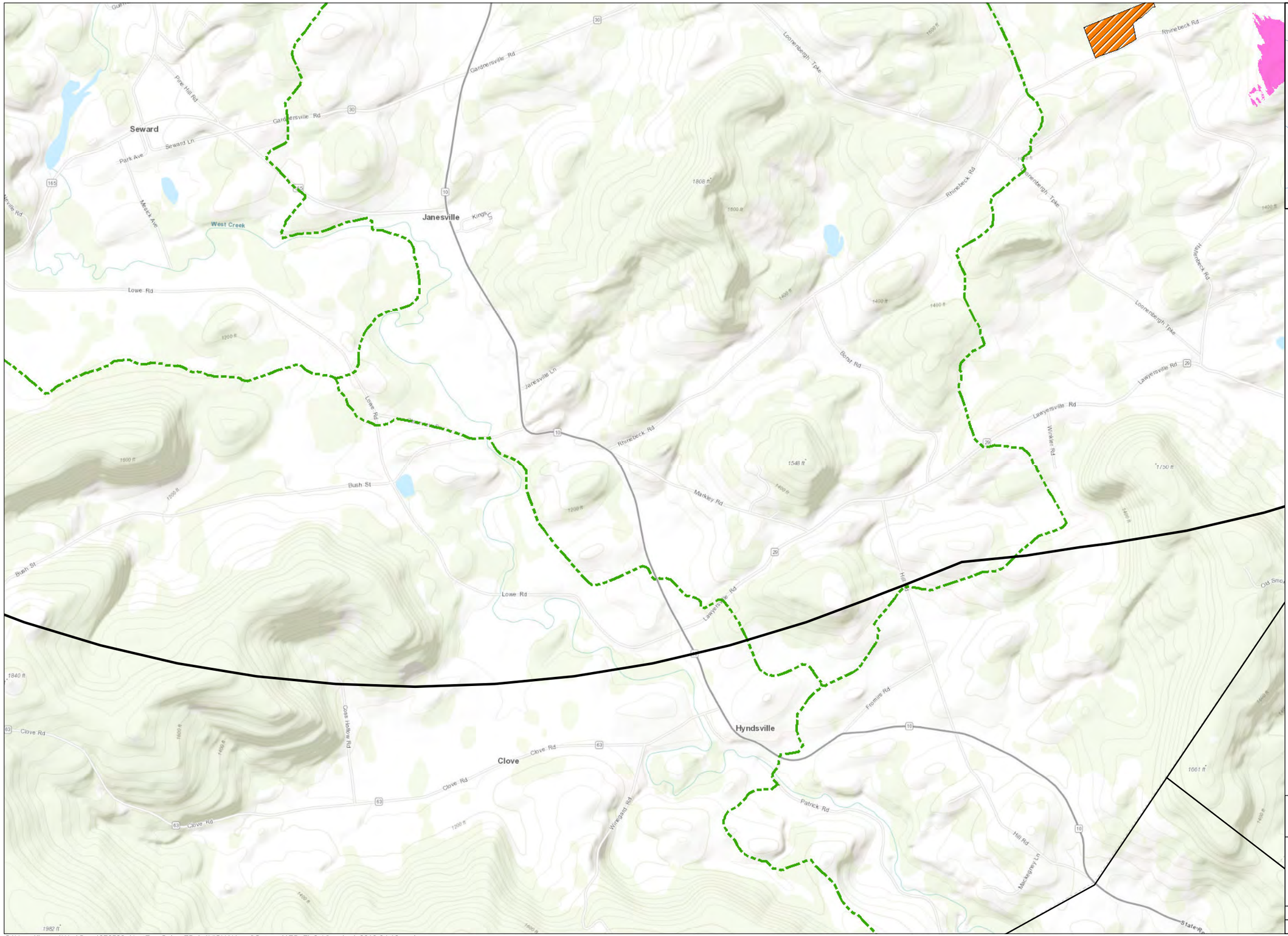

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TOWN OF SHARON, NY

FIGURE 3	MAY 2019

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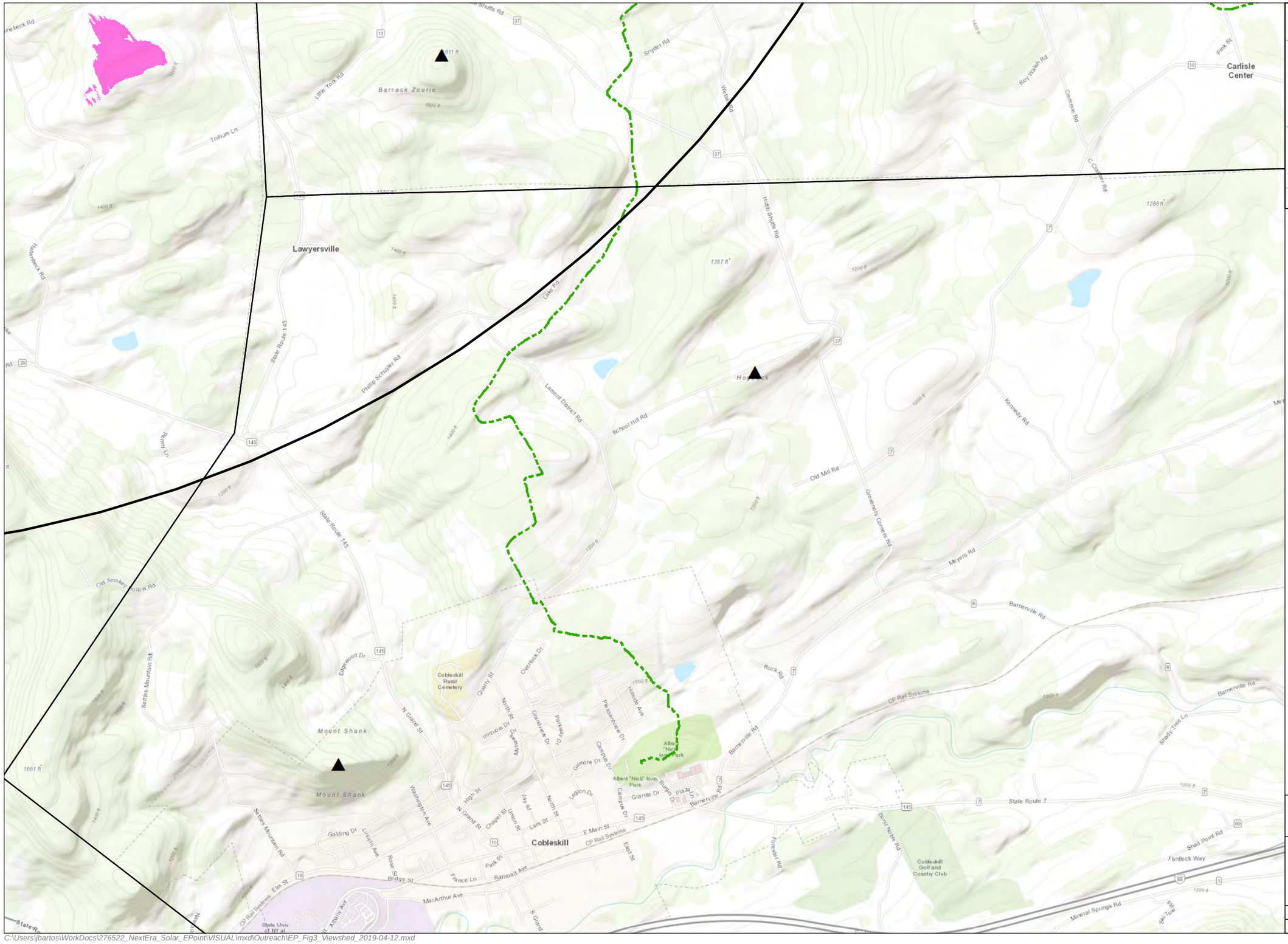

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ATTACHMENT 3

PHOTOLOG

Viewpoint 1a

4400,4401,4402

Location

Beech Rd.

Town: Sharon

Photo Date: 5/1/2018

Orientation: NW to N

Viewpoint 1b

4404,4406

Location

Beech Rd

Town: Sharon

Photo Date: 5/1/2018

Orientation: NE

Viewpoint 2a

4407,4408

Location

Route 20

Town: Sharon

Photo Date: 5/1/2018

Orientation: W

Viewpoint 2b

4409.4410,4411

Location

Route 20.

Town: Sharon

Photo Date: 5/1/2018

Orientation: N to E

Viewpoint 3

4412,4414

Location

Route 20

Town: Sharon

Photo Date: 5/1/2018

Orientation: N

Viewpoint 4

4417,4418,4419

Location

Slate Hill

Town: Sharon

Photo Date: 5/1/2018

Orientation: NW to N

Viewpoint 6

4422,4423, 4424

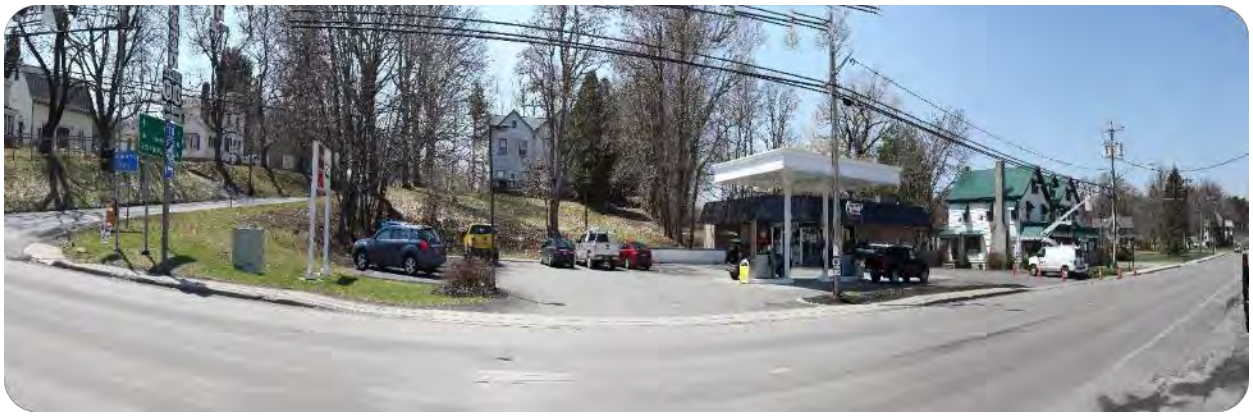
Location

Sakon Rd

Town: Sharon

Photo Date: 5/1/2018

Orientation: N



Viewpoint 8

4428,4429,4430,4431

Location

Route 20. Character picture of Sharon Springs.

Town: Sharon

Photo Date: 5/1/2018

Orientation: N to NE

Viewpoint 9b

4436, 4437, 4438, 4439

Location

Main Street. Sharon Springs Historic District

Town: Sharon

Photo Date: 5/1/2018

Orientation: S

Viewpoint 10a

4440,4441,4442

Location

Gilberts Corners Rd

Town: Sharon

Photo Date: 5/1/2018

Orientation: SE to SW

Viewpoint 10b

4443,4444,4445

Location

Gilberts Corners Rd

Town: Sharon

Photo Date: 5/1/2018

Orientation: SW to NW

Viewpoint 11a

4446,4447,4448

Location

Empie Rd

Town: Sharon

Photo Date: 5/1/2018

Orientation: NE to E

Viewpoint 11b

4449,4450

Location
Empie Rd

Town: Sharon

Photo Date: 5/1/2018

Orientation: E to SE

Viewpoint 11c

4451,4452,4453

Location
Empie Rd

Town: Sharon

Photo Date: 5/1/2018

Orientation: S to W

Viewpoint 11d

4454,4455,4456

Location
Empie Rd

Town: Sharon

Photo Date: 5/1/2018

Orientation: W to NW

Viewpoint 12

4457,4458,4459

Location

Gilberts Corners Rd

Town: Sharon

Photo Date: 5/1/2018

Orientation: NW

Viewpoint 14

4462,4463

Location

Parsons Rd

Town: Sharon

Photo Date: 5/1/2018

Orientation: NE

Viewpoint 15

4465,4466,4467

Location

Route 20

Town: Sharon

Photo Date: 5/1/2018

Orientation: S

Viewpoint 17a

4469,4470

Location

Route 20

Town: Sharon

Photo Date: 5/1/2018

Orientation: NE

Viewpoint 17b

4471,4472

Location

Route 20

Town: Sharon

Photo Date: 5/1/2018

Orientation: S to SW

Viewpoint 17c

4473,4474

Location

Route 20

Town: Sharon

Photo Date: 5/1/2018

Orientation: SW to W

Viewpoint 5

Location

View north from Slate Hill Rd near resident.

Single photo.

Town: Sharon

Photo Date: 5/1/2018

IMG_4423

Viewpoint 13

Location

View southeast from Rt 20 scenic byway near village of Sharon Springs.

Single photo

Town: Sharon

Photo Date: 5/1/2018

4460

215 Greenfield Parkway
Suite 102
Liverpool, NY 13088

315.671.1600 PHONE
315.451.7903 FAX

www.trcsolutions.com

October 29, 2018

Ms. Ruth Pierpont, 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 East Point Energy Center (Solar), Town of Sharon, Schoharie County, New York

Dear Ms. Pierpont,

East Point Energy Center, LLC, (East Point Energy Center) proposes to construct a solar energy center, the East Point Energy Center, under Article 10 of the Public Service Law (PSL). The East Point Energy Center (Project) will have a generating capacity of 50 megawatts (MW) of power located in the Town of Sharon, Schoharie County, New York **(Figures and 1 and 2, attached**).

Project facilities will include commercial-scale solar arrays, associated inverters, access roads, buried (and possibly overhead) electric collection lines, a collection substation and new point of interconnection (POI) facilities, within an approximate 1,313-acre site (the Project Area). Approximately 350 acres of the site will be developed with the aforementioned facilities. East Point Energy Center anticipates that the POI facilities will be transferred to National Grid to own and operate. The collection substation and POI facilities will be located on land adjacent to the solar arrays within the Project Area, adjacent to National Grid's existing Sharon-Marshville 69 kV transmission line.

TRC Environmental Corporation (TRC) has been retained by East Point Energy Center, LLC to provide environmental review and licensing services in support of the Project. The purpose of this letter is to initiate formal consultation with your agency 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) that will be required in support of Project review. To that end, TRC plans to conduct Phase IA archaeological studies, and if deemed necessary as explained below, a IB Study, and a historic architectural survey in advance of proposed construction to identify cultural resources.

Archaeology

The objective of the Phase IA study 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) may be needed to identify archaeological resources within the Area of Potential Effect (APE). Based on a review of CRIS, there are no known previously recorded archaeological sites with the Project Area boundaries. There are two previously recorded archaeological sites located within a one-mile radius of the Project **(see Figure 2)**. For archaeological resources, the APE is defined as a location where significant ground

disturbances may occur, including the construction of access roads, work spaces, buried electric collection lines, and electrical interconnection facilities. It is anticipated that the installation of posts for solar panels, as well as fencing, would be conducted by pile-driver or similar device and not constitute a significant ground disturbance. Should a Phase IB survey be determined necessary, East Point Energy Center will provide a scope of work for your agency's review and concurrence prior to initiation of field studies.

Historic Architecture

The APE for above-ground structures is defined as the geographic area or areas within which the undertaking may directly or indirectly cause changes in the character or use of historic properties. The APE is determined in relation to the scale of the undertaking, including new construction, improvements, or demolitions to be made during operation and maintenance of the Project. The Project Area is known to contain at least two farm complexes; accordingly, the Project is expected to have no physical impacts to above-ground resources.

The APE for indirect (visual, atmospheric, or audible) effects includes those areas removed in distance, where Project components will be visible and where there is a potential for a significant visual effect. Consistent with the requirements set forth in the Article 10 regulation, 16 NYCRR § 1000.2 (ar), the Study Area to be used for above-ground resource analysis is anticipated to comprise those areas within five miles of the proposed Project and which fall within the potential Project viewshed (i.e., those areas from which the Project is potentially visible). The five-mile-radius above-ground resource study area for the Project includes parts of the Towns of Sharon, Seward, and Carlisle and the Village of Sharon Springs in Schoharie County, and the Towns of Root and Canajoharie in Montgomery County. We propose that the same five mile radius be used as the APE.

We look forward to continued consultation with your office as well as submittal of detailed cultural resource work plans, as needed, in support of the licensing process. Should you have any questions or require additional information, please do not hesitate to contact me at (315) 362-2415, or SKranes@trcsolutions.com.

Sincerely yours,

Samantha Kranes

Samantha Kranes
Project Manager, TRC

cc: Kris Scornavacca, Project Director
Timothy Sara, TRC

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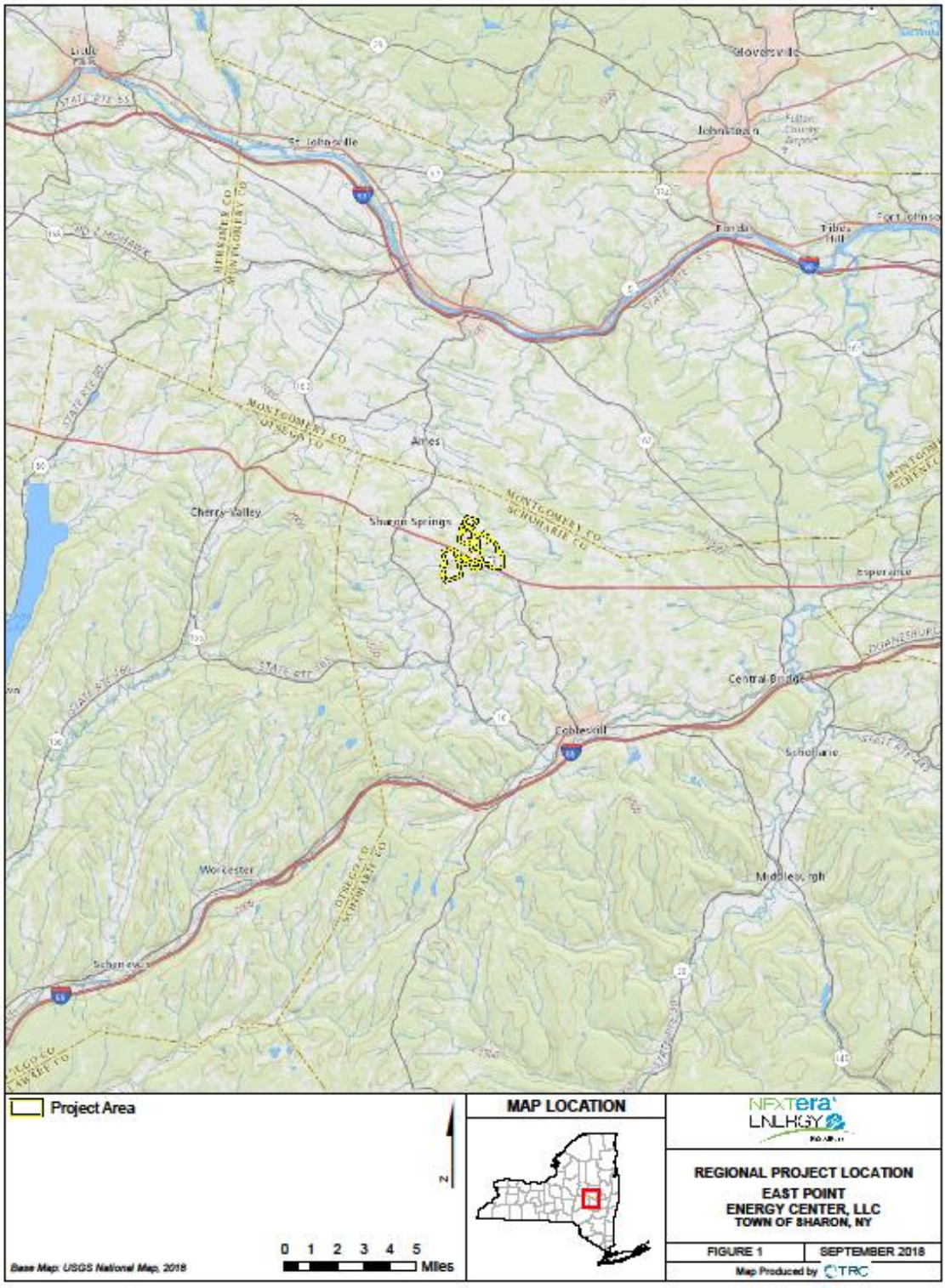

Figure 1: General project location in Schoharie County, New York

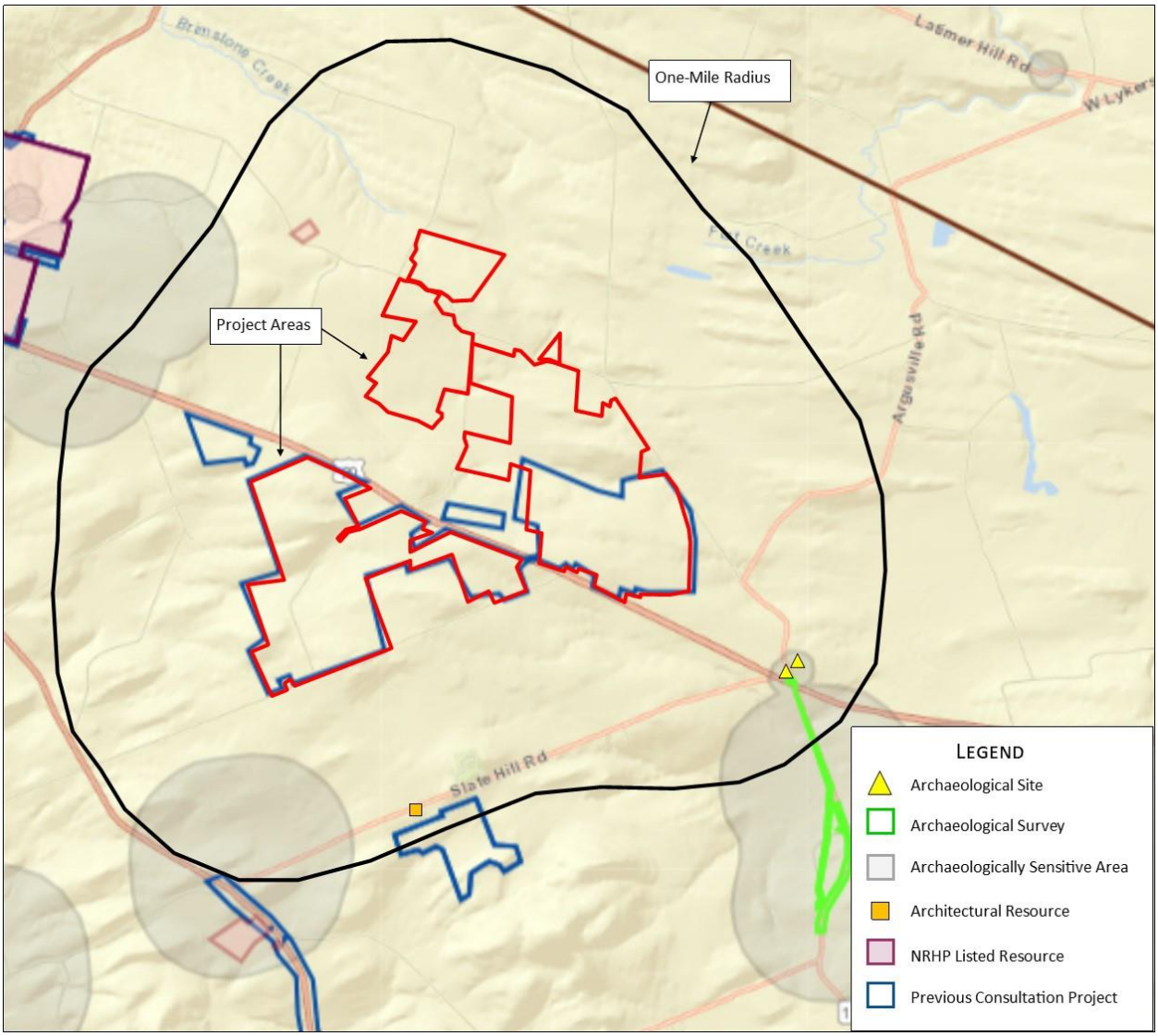

Figure 2: Detail of Draft Project Area superimposed over OPRHP Cultural Resources Information System (CRIS) Webviewer (*accessed August 2018*).

ARCHEOLOGY COMMENTS
Phase 1 Survey Request for Solar Farms

East Point Energy Center Solar Farm
Town of Sharon, Schoharie County
18PR02712

Based on its environmental setting, we have determined that your project area is archaeologically sensitive. Therefore, the New York State Office of Parks, Recreation and Historic Preservation and its State Historic Preservation Office (SHPO) recommends that a Phase IA/B archaeological investigation is warranted and offers the following survey guidance.

Phase IB archaeological testing is recommended for areas of substantial proposed ground disturbance, which includes areas of grading, grubbing, tree removal, and any excavations more than one foot wide and more than six inches deep.

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. However, if the installation of the panel array supports, fencing or utility poles requires excavation or grubbing and grading then Phase IB archaeological testing is recommended.

If you consider the project area to be disturbed, documentation of the disturbance will need to be reviewed by SHPO. Examples of disturbance include mining activities and multiple episodes of building construction and demolition. Documentation of ground disturbance typically consists of soil bore logs, photos, or previous project plans.

If you have any questions concerning archeology, please contact Nancy Herter at (518) 268-2179 or nancy.herter@parks.ny.gov.