



New York State Office of Parks, Recreation and Historic Preservation

Historic Preservation Field Services Bureau • Peebles Island, PO Box 189, Waterford, New York 12188-0189

518-237-8643

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David A. Paterson
Governor

Carol Ash
Commissioner

August 30, 2010

Patrick J. Heaton
EDR
217 Montgomery Street, Suite 1000
Syracuse, NY 13202

Re: CORPS, PSC, SEQRA
Marble River, LLC Wind Farm Project
74 Turbines
Towns of Clinton and Ellenberg,
Clinton County
06PR00069

Dear Mr. Heaton:

The Office of Parks, Recreation and Historic Preservation (OPRHP) is responding to the Marble River, LLC Application to Modify the Issued Permit for Wind Energy Conversion Systems (WECS) dated July 30, 2010, which was submitted to this office on August 20, 2010. This document calls for the further reduction of this project's turbine field from its most recent plan, which included 99 (407 foot) turbines to a new configuration of 74 (492 foot) units. The original plan submitted to this office in 2006 called for the construction of 109 turbines.

As noted in your letter, in 2008 our office was a signatory on a Memorandum of Agreement that resolved the adverse effects on historic/cultural resources associated with the previous project design. This agreement document concluded the Section 106 review process for this undertaking.

It is my understanding that changes to the scope of the undertaking, such as the reduction of the turbine field and the associated new turbine heights should be addressed with an amendment to the original agreement document. A discussion of such an amendment should be undertaken with the U.S. Army Corps of Engineers who served as the lead federal agency on this project.

With these procedural issues stated I would now like to address the project changes and their potential impacts upon historic/cultural resources in the project's Area of Potential Effect (APE). We have reviewed the viewshed analysis mapping information provided (Figures 1 & 2 Historic Resources Viewshed Analysis Blade Tip Vegetation and Topography Visibility). We find that while the turbine field reduction and turbine height increase have altered the APE in some areas we recommend that all areas identified under the previous proposal remain as part of the current project APE.

Based on this slightly expanded APE we find that the same properties previously identified as part of our original Adverse Effect letter dated October 29, 2007 will continue to be adversely affected by this revised undertaking. Although not documented in the submitted report, it is our expectation that due to the increased height of the turbines (87 feet) the visual impacts to some of the identified historic

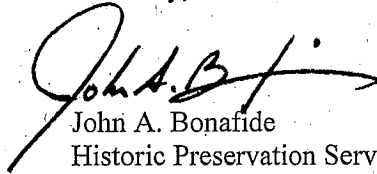
resources may actually be more significant even though the total number of turbines has been reduced. Blades once slightly visible above the existing tree canopy will now be more fully exposed.

Regarding archaeology, we concur that sufficient archeological testing was completed under the previous plan. No additional testing is recommended at this time.

As previously noted, we recommend that the next step in the now reopened Section 106 process will be to draft an appropriate amendment to the executed MOA that memorializes the changes associated with this revised project scope. This document will then need to be executed by all original signatories and provided to the Advisory Council on Historic Preservation for their comment.

If you should have questions regarding our comments or if you would like to discuss potential amendment language, please do not hesitate to contact me at 518-237-8643, ext.3263.

Sincerely,



John A. Bonafide
Historic Preservation Services
Coordinator

cc: Andrew Davis, NYPSC (via e-mail)
Daniel A. Spitzer (via e-mail)
Daniel Fitzgerald, Horizon Wind Energy (via e-mail)
Christine Delorier, ACOE (via e-mail)
LaShavio Johnson, ACHP (via e-mail)