



Architectural Resources Mitigation

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Consultation for this Project has been initiated with the New York State Historic Preservation Office (NYSHPO) pursuant to Article 14 of the New York Parks, Recreation, and Historic Preservation Office (see Appendix G, Agency Correspondence). Due to the presence of wetlands within the Project area of potential effect (APE), the United States Army Corps of Engineers (USACE), serving as the lead federal agency, will oversee the wetland permitting process as well as the requirements associated with Section 106 of the National Historic Preservation Act (NHPA), as amended. As part of this consultation, Ball Hill may be required to mitigate adverse visual affects to properties that are listed or are considered eligible for listing on the National Register of Historic Places (NRHP) through a Memorandum of Agreement (MOA) with the USACE. Because a number of individual historic resources and two historic districts are located within the Project APE, it is anticipated that mitigation for visual impacts will be required. Consultations with the NYSHPO will culminate with an appropriate combination of mitigative actions to be implemented by Ball Hill. Mitigative strategies suggested by NYSHPO include the following:

- Professional design and siting;
- Maintenance;
- Surveys;
- Monetary contributions;
- Heritage tourism;
- Educational activities; and
- Historic activities.

Due to the size of the wind turbines and the geographical extent of the Project, direct mitigation through plantings and screenings is generally not considered viable. In addition, moving tower locations will not significantly minimize impacts due to their placement throughout the landscape. Based on these conditions, direct mitigation will have little affect toward actually mitigating impacts from the proposed Project, therefore, indirect mitigation projects will likely be used to address the need for mitigation.

The mitigation of visual effects to historic properties for this Project presents an opportunity for a number of alternative mitigative strategies. The usual mitigative approaches can be applied; however, broader alternative strategies can encourage local community input and assist those communities through the undertaking of “hometown” cultural resource projects that are commonly in need of financial and professional assistance. The mitigative strategies below are grouped into several categories. These categories overlap; and some of the categories include the more traditional mitigative alternatives.

Project Criteria

The following working criteria for any proposed “historical mitigation” project or activity. These criteria provide that the subject of any such project should:

1. Be consistent with the guidance of NYSHPO.

2. Have historical significance.
3. Serve a public historic purpose.
4. Be a good investment.
5. Be appropriate to the state of preservation of local historical resources.

Professional Design and Siting

The New York State Department of Environmental Conservation (NYSDEC) considers a properly designed and sited project the best way to mitigate potential impacts. The Project has been designed to mitigate visual impact where practicable.

Maintenance

NYSDEC considers the maintenance of buildings/structures and landscapes and decommissioning to be a mitigation strategy. Proper maintenance prevents “eyesores” and is part of Ball Hill’s plan for the Project. A decommissioning plan is included as Appendix R of this Final Environmental Impact Study (FEIS).

Surveys

The completion of various types of surveys is a more traditional form of Section 106 mitigation; nevertheless, it can also be used as a type of “offset” as described by NYSDEC. An “offset” is the correction of an existing aesthetic problem identified within a zone visual influence as compensation for project impacts. Elements of these surveys can include:

- Geographic information system mapping of the county’s cultural resources within the affected area.
- Complete a detailed architectural survey of Chautauqua County.
- Conduct surveys identifying specific architectural styles and types of buildings, structures, and landscapes within the counties, towns, villages and hamlets affected by the Project.
- Listing National Register Eligible (NRE) resources.
- Sites/buildings/structures/objects/districts/landscapes that have been identified as NRE, but never listed within the area affected by the Project.
- Completing formal recordation documents (e.g., Historic American Buildings Survey, Historic American Engineering Record, Historic American Landscape Survey) for the power houses/dams as well as sites, buildings, structures, landscapes that have been identified but never completed within the APE.

Monetary Contributions

The creation of a pool of funds overseen by a third party is a less traditional, but effective way of offsetting Project impacts.

- Establish a monetary fund, with NYSHPO oversight, to initiate an historic landscape preservation program to support the preservation of historic landscapes in New York State. The introduction of such a program would offer technical assistance to municipalities and not-for-profit organizations to increase awareness of historic landscapes in New York State.

- Establish a cemetery maintenance program that can disburse funds to maintain the many small historic cemeteries in the area.
- Provide funds towards the construction of a “historic center” for storage and display of historic material. The location can be determined upon consultation with the county and affected towns.
- Donations to libraries in the affected area for purchase of local and Chautauqua County material.
- Create a Historic Property Visual Mitigation Grant Fund for use by the owners of historic structures affected by the Project. Funds from grants would be used to purchase on-site screening or make repairs to affected historic structures. The details of oversight, submission protocols, and eligibility will be negotiated with NYSHPO.

Heritage Tourism

The creation of Heritage Tourism materials has become an important part of municipalities, regions, and states promotional activities. These materials can be easily used by many individuals and widely distributed. Most of the activities listed below fall within the traditional Section 106 mitigation sphere, and all can be used as offset.

- **10-Minute Video Presentation.** A video presentation can be used in schools, for presentations to civic groups, and on public access television.
- **Brochure.** A brochure highlighting historic architecture can be distributed at public libraries, visitor’s centers, etc., within the affected area.
- **Posters.** Posters can be produced highlighting the area and its history.
- **Driving/Walking Tours.** Tours can be conducted out of the public library, visitor’s centers, etc., within the affected area.
- **Exhibit.** Exhibits focusing on history and architecture can be set up in libraries, visitor’s centers, town halls, etc., within the affected area.
- **Power-Point Presentation.** This can be used in schools for presentations to civic groups within the affected area.

Educational Activities

Educational activities have a broad appeal and can target a wide age group. Activities for school-age groups can help raise awareness of cultural resources within the community at an early age and engender excitement within the school system. Educational activities of various types are traditional Section 106 mitigation options; however, the creation of a graphic novel is a twist on this traditional use. The items below are also excellent offset activities.

- **Grade Appropriate Lesson Plans.** Packages can include teacher information, student activities, and possible field trips, long- and short-term class projects centered on the affected area and distributed via Internet.
- **Graphic Novel.** A comic book about the history of the area.
- **Host Public History Day.** A special event can be staged in conjunction with schools and chambers of commerce within the affected area.

Historic Activities

Activities related to historic resources are the most traditional of Section 106 mitigation strategies. Nevertheless, they can be useful and an important offset activity.

- A popular written history of the county. Produce a history highlighting specific county contributions to state and country, addressing the towns, villages and hamlets within the affected area.
- Historic brochure and/or series of brochures addressing various aspects of the county's, town's, village's and hamlet's history within the affected area.
- Oral history project.
- Placement of historic markers.
- Creation of context/s. Produce historical/architectural histories and contexts specific to the area, particularly a regional farming context.

Next Steps

Ball Hill will conduct meetings with local officials in both Villenova and Hanover to solicit their views with regard to indirect mitigation measures. Based on the host communities' expression of local needs and interest, a list of candidate projects will be developed and included in a Historic Resource Impacts Mitigation Plan prior to Project construction that will be developed by Ball Hill. The draft mitigation plan will be submitted to NYSHPO for review once NYSHPO makes a determination of impact. Once a specific mitigation project is selected, a final mitigation plan with site-specific construction details will be submitted. The selection of the project and the details of the plan will be based on ongoing consultation and will be approved prior to construction.

Local community input is vital to the success of any mitigation strategy. Accordingly, Ball Hill will discuss historic resource mitigation with local officials, including Town officials from Villenova and Hanover, local organizations, historians, and interested Town Board members. NYSHPO, the Town of Villenova, and the Town of Hanover will need to approve the decision.