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June 16, 2005

Via Fax (518) 233-9049 and Regular Mail

Mr. John A. Bonafide  
NYS OPRHP  
P.O. Box 189  
Waterford, NY 12188-0189

Re: Ecogen, LLC Prattsburgh/Italy Wind Farm

Dear Mr. Bonafide:

As a follow-up to our meeting with you and the SHPO staff, this letter will set forth our understanding of SHPO's pending comments on the DGEIS for this project and the further investigation that will occur as the project proceeds to specific site selection and development.

It is our understanding that SHPO staff has reviewed the DGEIS prepared for the Steuben County IDA acting as Lead Agency and SHPO concurs that as conditioned below, the DGEIS provides sufficient information regarding potential impacts to historical resources. As you are aware, the final siting of project components is dependent on the Findings of the Generic Environmental Impact Statement process. Further information will be provided to SHPO as the project proceeds beyond the generic impact stage. Ecogen is committed to working with SHPO throughout the siting process. This will ensure that any impacts to historical or archaeological resources are minimized, avoided or mitigated to the maximum extent practicable consistent with social, economic and other essential considerations.

In compliance with Section 106 review, Ecogen and SHPO have agreed to the following scope of work for future stages:

Archaeological

Areas that will be impacted by project construction (Area of Potential Effect) will be identified following the SEQRA Findings, once the final WTG, electrical collection system and service road locations have been determined. It was agreed that Phase 1 archaeological testing will concentrate on those areas directly impacted by the project's construction and which fall within 1 mile of a known archaeological site. In addition to the Phase 1 archaeological testing, Ecogen will create an inventory of medicinal plants native to areas of higher elevation and will explore how these plants were utilized by Native American groups. This study will provide a framework for understanding the types of natural resources available to Native Americans in upland settings. Ecogen's consultant, URS Corporation, will work with SHPO to determine the scope of that research. A Phase 1 Cultural Resource Investigation Report documenting the results of the archaeological testing and the medicinal plant study will be provided to the SHPO for review and comment. The SHPO will determine the need for additional archaeological investigation based on this review.

Historical Structures

Ecogen, through its consultant URS, will conduct a survey of historic structures within the Area of Potential Effects. The survey will include an evaluation of impacts on already listed and eligible NHRP properties. It will also consist of an initial inventory of a sample of properties over 50 years old within a five-mile radius of the proposed turbine locations once the turbine clusters are preliminarily established. This inventory survey will be phased and the initial sample survey will be reviewed by SHPO staff. URS will consult with the SHPO to provide information on eligibility of the inventoried sites. The complete inventory will include all properties over fifty years within a five-mile radius of the final turbine location, excluding those properties whose views are physically blocked from the turbines by topography. Those areas within the five mile radius that are excluded from the inventory must be approved by the SHPO. The site-specific assessments will include a determination of the visual impact from any turbine and whether the impact warrants a negative declaration from SHPO. In the course of the investigation, Ecogen will work with SHPO to avoid or minimize significant impacts to historic properties and if such impacts cannot be avoided to devise an appropriate mitigation program.

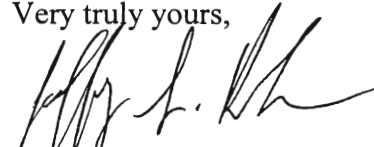
Please let me know if the foregoing accurately represents SHPO's view of the project and the subsequent studies. We would appreciate a written comment letter to SCIDA, including

Mr. John A. Bonafide

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confirmation of the above scope, by June 17th so it can be incorporated by SCIDA as part of the comments on the DGEIS.

Very truly yours,



Jeffrey S. Baker

cc:

M. Colmerauer, URS  
T. Hagner, Ecogen