



**Parks, Recreation,
and Historic Preservation**

KATHY HOCHUL
Governor

ERIK KULLESEID
Commissioner

February 22, 2022

Ms. Erin Drost
ORPHP
Taconic Regional Office
9 Old Post Rd
Staatsburg, NY 12580

Re: OPRHP
Hudson Highlands SPP/Fjord Trail
Town of Fishkill, Dutchess County, NY
14PR04481
EPF/PKS 148913

Dear Ms. Drost:

Thank you for continuing to consult with the Division for Historic Preservation (DHP) of the Office of Parks, Recreation and Historic Preservation. We have reviewed the project in accordance with the New York State Historic Preservation Act of 1980 (section 14.09 of the New York Parks, Recreation and Historic Preservation Law) and the Intra-Agency Protocol for Application of Section 14.09 (HP-PCD-001). These archaeology comments are those of the DHP and relate only to historic/cultural resources.

We are in receipt of the archaeology survey report (Phase IA Archeological Investigation, Hudson Highlands Fjord Trail, Putnam and Dutchess County, New York, 22SR00047) by STRATA Cultural Resource Management, LLC and dated October 2021. Specific report comments are enumerated in an attachment to this letter.

If you have any questions concerning archaeology, please do not hesitate to contact me at andrew.farry@parks.ny.gov or 518.268.2185.

Sincerely,

Andrew Farry, Ph.D.
Scientist/Archaeology

Cc: Dan Seymour, Parks
Nancy Stoner, Parks
Jim Turner, STRATA

14PR04481

Project: Hudson Highlands SPP/Fjord Trail

Phase IA report comments

Andrew Farry

2/22/2022

- Overall I think what is missing is a detailed discussion of the ground impacts/disturbance associated with the proposed trail and its various components- the horizontal APE is indicated on the Master Plan maps, but the actual ground impacts associated with each project component (main trail, banks, etc.) is not clearly discussed. As a result, it's hard to understand the potential impacts (or lack thereof) to existing archaeological resources.
- There is also some confusion over the site file search results and the existing archaeological sites included in the report discussion. The search radius is not clearly defined, and various sites in CRIS do not seem to be included in the discussion. The eligibility determinations for existing archaeological sites are also not included in the discussion.
- The Master Plan maps should have a second version that also maps/shows known archaeological sites from the site file search- this would be very helpful in understanding potential impacts (in addition to a clearer discussion of all the various ground impacts proposed).
- Not clear that the site file search includes all previously recorded sites- for example 02741.000010 or 02741.000011- why are these not included?
- Some confusion over the site file search results in Table 2, for example the Verplanck Site. The USN number does not seem correct? Should this refer to the VanPlanck Site (USN 02741.000010) which is not included in the table but is on the north end of Dennings Point? I think the site files results need to be confirmed for accuracy (plotting these on master plan maps as indicated above would be helpful)
- 02741.000403 Dennings Point precontact site is mentioned, but only that there will be no impacts. Again, a clearer discussion of the APE would be helpful to understand how/why there will be no impacts. Also, this site has been determined eligible for the NR as indicated in CRIS but this isn't mentioned- why not, and are other eligible resources not identified as such? Discussion of potential impacts to all eligible sites should be clearly addressed.
- Not sure why the north end of Dennings Point is considered not sensitive in this report- what do other surveys done near here say? Prehistoric site here was deemed eligible, so there must be some degree of integrity? If nothing else this issue needs to be clearly discussed. See also 2008 survey on Dennings Point that identified sensitive areas on Figure 18. Why is this not addressed in the report?
- Two NYSM museum sites on Dennings Point are not mentioned or included in the site file results.
- MP116- given 02741.000009 and prehistoric site nearby, why is archaeological testing not recommended for the creek crossing? Not clear on this exclusion.
- MP-118- yellow clouding should be included for trail meander leading to improved eagle blind.
- What is the search radius used for the site file search? One mile around the APE is standard, but in this case I would argue ¼ mile limited to the east side of river is warranted. But this should be clearly indicated in the report.
- MP-115- why no red/yellow clouding at Bank #54 area?
- Bottom of MP-114 should extend yellow clouding as per next figure.
- MP-112 and MP-113: is all land west of the RR tracks built land?
- MP-112 is missing the recommended yellow clouding for testing.
- MP-111 is missing all of the recommended yellow clouding for the areas to be tested.
- Hammond brickyard ruins not mentioned as an eligible USN- why?

- MP-103 map and discussion needs to more clearly indicate the areas of disturbance- it's not clear based on the report why no testing at all is recommended. The proposed impacts are also not clear on MP-103 given the various project elements.
- MP-101 has overlapping yellow/red clouding, but discussion indicates no testing is recommended here- needs to be resolved.
- Map 6 is not very useful beyond a very broad overview. Specific areas of precontact/historic sensitivity should be shaded at a finer level across the entire APE. Again, including known sites on the MP maps would be useful.
- Bannerman site is mentioned as not within APE, but cursory look at site form suggests it is within footprint of proposed overlook- expanded discussion of APE and current known site boundary would be helpful here.
- The Eligible Properties section (pg27) doesn't mention the eligible archaeo sites- why?
- Previous Survey section is not complete- what about all the other surveys indicated in CRIS along the northern section of the APE? For example, the 2008 survey on Dennings Point? These should be included in the discussion. Relevant surveys to include should be limited to those that overlap or are adjacent to current APE.
- Can the specific location of the Brett Cemetery be included on the MP section map?
- Is there a photograph key figure for the site visit photos? This discussion is hard to follow without specific map locational references in the text.
- It's hard to understand how the Bannerman site sits outside of the PA as mentioned pg 64. Plotting the apparent site boundary in relation to the APE would be helpful, as would better understanding of the actual ground impacts proposed here- for example, what ground disturbance is involved in the banks in this section? I realize the area is recommended for testing, so maybe this is all addressed in the Phase IB?
- Pg 67 second paragraph could use a more detailed accompanying map (compared to Map 6). The specific areas of precontact sensitivity should be drawn clearly across the APE, although at a more detailed scale than Map 6.
- The testing recommendations indicate that the MP maps include yellow clouding to show testable areas/areas of sensitivity. Again, both sensitive areas and areas recommended for testing should be clearly indicated on the project maps (although they overlap these are different areas). Also, the MP maps do not clearly or consistently indicate the yellow clouding for testable areas and should be updated.
- Does the red clouding on the MP maps only show areas that will use existing trails? Or does this also indicate areas of prior disturbance/made land? Does the red clouding only show areas that are NOT recommended for testing? What about section of APE that have neither red clouding or yellow clouding?
- At a minimum the MP maps should be updated to accurately reflect the areas recommended for Phase IB testing. Updated maps should also include known site locations/boundaries, and more clearly indicate sensitive areas.
- The site file search results should also be updated to clearly indicate the search area/radius and include all known sites. The discussion should also include the eligibility status of the sites.