



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
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October 28, 2008

Andrew C. Davis
State of New York
Department of Public Service
3 Empire State Plaza
Albany, NY 12223-1350

Re: PSC
NY Regional Interconnection Project
Multiple Counties
05PR03968

Dear Mr. Davis:

The Office of Parks, Recreation and Historic Preservation (OPRHP) is responding to the recent submissions by New York Regional Interconnect, Inc. to our office. This information included historic building survey data (received August 8, 2008) and a copy of a February 2008 volume entitled "Supplemental Article VII figures for the New York Regional Interconnect Project-Appendix A: Proposed Orthos 400 & proposed Orthos 400 Locus" received August 4, 2008. This information was received in response to our letter of March 28, 2008 seeking to have additional cultural resource survey work conducted along the entire route of the proposed undertaking.

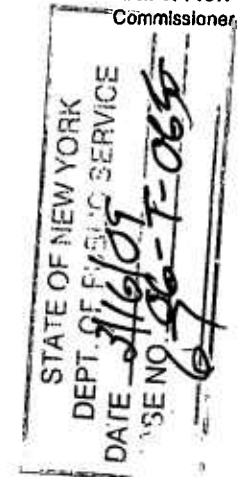
As previously discussed, our division of the New York State Office of Parks, Recreation and Historic Preservation will coordinate the Section 14.09 (NYPRHPL) review with your agency. This coordination has been triggered by the applicant's Section 68 Petition (Case 06-T-6050). However, our comments relate only to historic/cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8) and its implementing regulations (6 NYCRR Part 617).

I will begin by stating that the material submitted to date does not meet the level of information we generally seek for analysis with other forms of large-scale power projects such as co-generation plants and wind turbine complexes. Our standard minimum requirement for the assessment of historic/cultural resources associated with such projects was outlined in our letter of March 28, 2008 referenced above. While we continue to request that your agency seek a more comprehensive approach to the identification of historic/cultural resources that may be impacted by this undertaking, we are compelled to provide you with our comments based on the limited information that has been provided for analysis to date in order to have historic/cultural resources considered in the permitting process.

With that stated, we have reviewed the visual and survey information provided for the length of the proposed power line project. Based on information provided by the applicant, additional information found in the NYSHPO records, and the assessment of regional preservation staff assigned to the involved

David A. Paterson
Governor

Carol Ash
Commissioner



counties, we have established the following list of historic /cultural resources that are known to be extant within the undertaking's APE. They are by county as follows:

Oneida County

The following properties/districts are listed in the *National Register of Historic Places*¹: The Neck Canal (Marcy), St. Stephen's Church (New Hartford), St. Paul's Episcopal Church and Cemetery (Paris), the Deansboro Railroad Station (Marshall), the Waterville Triangle Historic District (Sangerfield), the Tower Homestead and Masonic Temple (Sangerfield). The following *National Register Listed* resources are all located within the city of Utica: The Byington Mill (Frisbie & Stansfield Knitting Mill), The Conkling-Roscoe, House, The Doyle Hardware Building, The First Baptist Church of Deerfield, The First Presbyterian Church, The Fort Schuyler Club Building, Fountain Elms, The Grace Church, The Hurd & Fitzgerald Building, The Lower Genesee Street Historic District, Memorial Church of The Holy Cross, The Millar-Wheeler House, The New Century Club, St. Joseph's Church, The Stanley Theater, Union Station, The Utica Daily Press Building, The Utica Public Library, The Utica State Hospital, The Rutgers-Stauben Park Historic District (Utica) and The Utica Armory.

The following communities/areas contain known concentrations of resources, which have been determined to be *Eligible* for inclusion in the *National Register of Historic Places*¹: Sangerfield, New York Mills, New Hartford, Waterville and the City of Utica. In addition, the National Register eligible NYS Barge Canal, and sections of the original and the enlarged Erie Canal fall within the project APE.

Madison County

The following properties/districts are listed in the *National Register of Historic Places*¹: The Hamilton Village Historic District (Hamilton), Old Biology Hall (Hamilton), The Adon Smith House (Hamilton) and The US Post Office (Hamilton).

The following communities/areas contain known concentrations of resources, which have been determined to be *Eligible* for inclusion in the *National Register of Historic Places*²: North Brookfield, Brookfield, Hubbardsville, Poolville, Hamilton and Earlville.

Chenango County

The following properties/districts are listed in the *National Register of Historic Places*¹: The Bainbridge Historic District, The Charles Hovey Residence and Armstrong Leather Company Mill (Bainbridge), The Rockdale Community Church (Guilford), Guilford Cemetery (Guilford), Guildford Center Presbyterian Church (Guilford), The Chenango County Courthouse District (Norwich), The Methodist-Episcopal Church of Norwich (Norwich), The North Broad Street Historic District (Norwich), US Post Office (Norwich), Theodore Burr House (Oxford), The Oxford Village Historic District (Oxford), US Post office (Oxford), Sherburne Historic District (Sherburne), Earlville Opera House (Sherburne), Sherburne High School (Sherburne), West Hill Cemetery (Sherburne), Smyrna Elementary School (Smyrna), Upperville Meeting House (Smyrna), and the Earlville Historic District (Earlville).

The following communities/areas contain known concentrations of resources, which have been determined to be *Eligible* for inclusion in the *National Register of Historic Places*¹: Afton, Bainbridge, Hamlet of West Hill, Sherburne, Hamlet of North Norwich, portions of the Town of Plymouth, Hamlet of Springvale, Hamlet of Guildford Center, Hamlet of Rockdale, Hamlet of East Guilford, Bainbridge (potential rural historic district), Hamlet of Bettysburg, a section of the Susquehanna River (Traditional Cultural Property) and portions of the Chenango Canal.

Broome County

The State Theater (Sanford) is located within the APE for this undertaking and is listed in the *National Register of Historic Places*¹.

The following communities/areas contain known concentrations of resources, which have been determined to be *Eligible* for inclusion in the *National Register of Historic Places*: The towns of Sanford and Deposit. In addition, the Page Pond Fire Tower (Sanford) has been determined to be eligible for inclusion in the Register.

Delaware County

The Lordville Presbyterian Church (Hancock) is located within the APE for this undertaking and is listed in the *National Register of Historic Places*.¹

The following communities/areas contain known concentrations of resources, which have been determined to be *Eligible* for inclusion in the *National Register of Historic Places*: Deposit, Hancock and Sidney.

Sullivan County

The following properties/districts are listed in the *National Register of Historic Places*: Hessinger Store (Callicoon), Jeffersonville School (Cohocton), Cochection Railroad Station (Cohocton), Parsonage Road Historic District (Cohocton), Reilly's Store (Cohocton), Cochection Presbyterian Church (Cohocton), Ellery Calkins House (Cohocton), Page House (Cohocton), Cochection Center Methodist Episcopal Church (Cohocton), Drake-Curtis House (Cohocton), Old Cochection Cemetery (Cohocton), Vallean Tavern (Cohocton), Callicoon Methodist Church and Parsonage (Delaware), St. Joseph's Seminary (Delaware), Stone Arch Bridge (Delaware), Callicoon National Bank (Delaware), German Presbyterian Church (Delaware), German Presbyterian Church and Hortonville Cemetery (Delaware), St. James Church and Rectory (Delaware), Anthony Manny House (Fremont), Hankins Stone Arch Bridge (Fremont), Riverside Cemetery (Fremont), Bloomingburg Reformed Protestant Dutch Church (Mamakating).

The following communities/areas contain known concentrations of resources, which have been determined to be *Eligible* for inclusion in the *National Register of Historic Places*: The hamlets of Hortonville, Lordville, Callicoon Center and Cochection.

Orange County

The following properties/districts are listed in the *National Register of Historic Places*: Blooming Grove Church (Blooming Grove), W.M. Sayer House (Goshen), Bull Stone House (Hamptonburgh), William Bull III House (Hamptonburgh), Bull-Jackson House (Hamptonburgh), Horton-Webb House (Middletown), Oliver Avenue Bridge (Middletown), Tweddle Farmstead (Montgomery), Union Street-Academy Hill Historic District (Montgomery), Daniel Waring House (Indian Hill) (Montgomery), The African-American Cemetery (Montgomery), Benjamin Haines House (Montgomery), Johannes Miller House (Montgomery), The Moses Mould House (Montgomery), The Jacob Shafer House (Montgomery), The John Blake House (Montgomery), Bridge Street Historic District (Montgomery), John A. Crabtree (Montgomery), Harrison Meeting House Site and Cemetery (Montgomery), Nathaniel Hill Brick House (Montgomery), Gideon Pelton Farm, The John Tears Inn (Wallkill) and portions of the Delaware and Hudson Canal (NR and NHL).

The following communities/areas contain known concentrations of resources, which have been determined to be *Eligible* for inclusion in the *National Register of Historic Places*: Blooming Grove, Hamptonburgh, Middletown, Wallkill and Montgomery, the Village of Montgomery and the Village of Otisville.

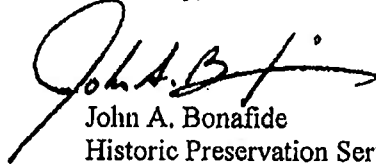
Additionally, there are identified *National Register Eligible* resources located in Brookfield and Hamilton, Madison County, as well as the National Register Listed Andrew Mann Inn, Unadilla, Otsego County.

With the exception of the urbanized areas of Utica, Middletown and to a lesser extent Norwich, the vast majority of the National Register Listed and Eligible resources and districts are located in ostensibly rural and/or agrarian settings. In general, the landscape or settings associated with the environs of these resources feature residential scale utilities, industrial and agricultural structures. The construction of a new 190 mile HVDC transmission line through these communities and in proximity to the above noted resources will have a demonstrable and long term impact on their setting. While a portion of the line will be underground, thus avoiding some of the historic resources in the more densely populated areas of the route and in other areas will follow existing utility/transportation right of ways, a significant portion of the line will traverse the existing rural landscape in seven counties. It is our finding that these sections of new line will be partially or potentially visible from National Register listed properties (both individual properties and contributing properties in several-hundred historic districts).

As such, it is the opinion of this office that the proposed New York Regional Interconnect Transmission Line project will have an *Adverse Impact* on historic/cultural resources. Our determination is based on Section 428.7 of the regulations implementing Article 14 of the New York Parks, Recreation and Historic Preservation Law (NYSPRHPL), which requires that issues such as the introduction of visual, audible or atmospheric elements which are out of character with the property or alter its setting be considered when determining whether or not an undertaking will have an adverse impact. While the inclusion of underground routing and Corten steel support structures will aid in mitigating the line where there are backdrop visual elements such as ridge or tree lines, the overall project will nevertheless alter the rural settings for many of the identified National Register listed and eligible resources.³ Of particular concern are areas where new tree cuts will be required, which are discernable for miles and alter the visual characteristics of the rural landscape, which is an important aspect of setting for National Register consideration.⁴

At this time, based on the limited materials provided, we have concluded our review of the potential impacts to historic properties associated with this proposed undertaking. We would recommend that the next step would be for your agency to determine if any additional feasible and prudent alternatives, beyond those outlined in the Supplemental Visual Impact Analysis document (May 30, 2008, Section 8.3), will be required. If I can be of any further assistance or if you would like to discuss our recommendations I can be reached at (518) 237-8643, ext.3263.

Sincerely,



John A. Bonafide
Historic Preservation Services
Coordinator

cc: Leonard H. Singer

¹ List of county National Register Listed resources is derived from NYSHPO records and Tables B1 & B2 Aesthetic Resources, attachment to letter of August 8, 2008 Leonard H. Singer to Hon. Jaclyn Billing. Sites noted under the column "Visibility Based Upon Topographic Viewshed" where the determination was "Potentially Visible" or "Partly Visible" are included in our listing.

² List of communities/areas or sites, which are eligible for inclusion in the National Register or which have high concentrations of resources was derived from NYSHPO records, NYSHPO regional staff, and Tables B1 & B2 Aesthetic Resources, attachment to letter of August 8, 2008 Leonard H. Singer to Hon. Jaclyn Billing.

³ See Supplemental Simulations 22-147S and 4-38S, as provided in document titled Response to March 24, 2008 NYPSC Letter, May 2008 as examples of new visual intrusions.

⁴ See Supplemental Simulations 14-78S and 15-92S, as provided in document titled Response to March 24, 2008 NYPSC Letter, May 2008 as examples of new visual intrusions.

