



**Parks, Recreation,
and Historic Preservation**

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Commissioner

April 12, 2021

Mr. John Konier
Planning Board Chair
Town of Kingston
906 Sawkill Road
Kingston, NY 12401

Re: DEC, SEQRA
850 Route 28 LLC: Steel and Concrete Fabrication Facility
Town of Kingston, Ulster County, NY
18PR04534

Dear Mr. Konier:

The Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP) has reviewed the "Phase IB Archaeological Addendum 850 Route 28, LLC Steel and Concrete Fabrication Facility Report" (the Report), prepared by Joseph Diamond, (October 6th 2020; 20SR00640) 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). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources.

Several studies of the historic bluestone quarry industry in the Bluestone Wild Forest by Paul Rubin (HydroQuest), strongly suggest that portions of the former Waughkonk Road are located within the project area (see attached HydroQuest map). According to Rubin, "Waughkonk Road was a major woods road used by travelers, bluestone quarry workers and, reportedly, by Native Americans." These studies by Rubin are based on detailed historic map research, an understanding of the underlying geology of the area, and intensive field investigations. None of Rubin's field investigations have occurred within the project area boundaries.

The OPRHP does not concur with the Report's conclusion that the Phase IB Addendum analysis mitigates the adverse impacts of the project on the early to mid-nineteenth century Hemlock Historic Bluestone Quarry District (11106.000034), which OPRHP has determined is eligible for the New York State and National Registers of Historic Places, and that no further work is warranted for this project. It is the OPRHP's opinion that additional systematic Phase IB archaeological survey work is warranted for all undisturbed portions of the project area to investigate the potential for portions of the former Waughkonk Road, for other quarry related features such as stone berms and worked sandstone flagstones, and for Native American sites that may be associated with the former trail.

In addition, it is the OPRHP's opinion that a Phase II Site Evaluation is warranted for the undisturbed portions of the identified quarry area, located in the northeastern portion of the project area. We request that a Phase II archaeological work plan be submitted to OPRHP for review. The Phase II study should be designed to help define site size and internal structure. OPRHP recommends that future archaeological investigations be undertaken by an archaeologist that specializes in the analysis of industrial archaeological sites.

Division for Historic Preservation

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While fieldwork in rocky, previously mined terrain can be difficult, Paul Rubin has demonstrated that it is possible to undertake such fieldwork safely. Please note that if additional quarry features and archaeological sites are identified during the Phase IB survey, additional Phase II Site Evaluation investigation may be necessary.

If you have any questions, I can be reached at nancy.herter@parks.ny.gov.

Sincerely,

A handwritten signature in cursive script that reads "Nancy Herter".

Nancy Herter
Archaeology Unit Program Coordinator

cc. Charles Vandrei, DEC Agency Preservation Officer
David Witt, DEC Indian Nations Affairs Coordinator

