Appendix C
Historic and Cultural Resources

Information Included in Appendix C, Historic and Cultural Resources

C-1 Letters of Effect

C-2 Section 106 Finding Documentation

C-3 Section 106 Consulting Parties Meeting

C-4 Section 106 Correspondence

C-5 Draft Memorandum of Agreement

C-6 Letchworth State Park National Register Registration Form

Appendix C: Historic and Cultural Resources

C-1 Letters of Effect

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232
www.dot.ny.gov

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

February 11, 2014

Julian W. Adams, Director
Bureau of Community Preservation Services
N.Y.S. Office of Parks, Recreation and Historic Preservation
P.O. Box 189 Peebles Island
Waterford, NY 12188

RE: Portageville Bridge Project
PIN 4935.79.101
Towns of Portage and Genesee Falls,
Livingston and Wyoming County
SHPO # 08PR04896

Dear Mr. Adams:

The New York State Department of Transportation (NYSDOT) is completing preliminary design for the above referenced state and federally funded/licensed project. The project was previously reviewed by the State Historic Preservation Officer in accordance with Section 14.09 of the New York State Historic Preservation Act of 1980, in coordination with a SEQR Draft EIS; since that time the project has received federal funding.

Enclosed is Finding Documentation, prepared in accordance with Section 106 of the National Historic Preservation Act, 36 Section 800.11(e). This documentation summarizes the project and its effects on properties included in or eligible for inclusion on the National Register of Historic Places.

The Portageville Bridge Project (Project) is a federally funded project being undertaken by the Norfolk Southern Railway Company (Norfolk Southern) with the Federal Highway Administration (FHWA), serving as the federal lead agency for review under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA). The New York State Department of Transportation (NYSDOT) is serving as a joint lead agency. The purpose of the Project is to maintain a vital link in the regional and national transportation network by providing a new Genesee River rail crossing between Wyoming and Livingston Counties on the Southern Tier rail freight route. The proposed rail crossing would be located on the Southern Tier route as it passes through Letchworth State Park, New York.

The Project would address the structural, operational, safety, security, and mobility deficiencies of the existing Portageville Bridge. Letchworth State Park is listed on the State and National Registers of Historic Places (S/NR) and the existing rail crossing, the Portageville Bridge or Portage High Bridge, is one of the contributing elements to that listing.

Based on our review of the project, we have applied the criteria of effect in accordance with 800.5(b) and conclude that this project will have an *Adverse Effect* on historic properties.

The NYSDOT respectfully requests that the State Historic Preservation Officer review this finding and issue a letter of concurrence with the Adverse Effect recommendation. In additional the NYSDOT requests an expedited review with a response by February 18, 2014.

If you have any questions or need additional information, please contact me at 585-272-4833 or christopher.caraccilo@dot.ny.gov .

Sincerely,

Christopher P. Caraccilo
Cultural Resource Coordinator, Region 4

Enclosure (Finding Documentation)

Cc: Jonathan McDade, Division Administrator FHWA
Michael Kowalczyk, Area Engineer FHWA (with enclosure)
Ray Hessinger, NYSDOT
Dan Hitt, NYSDOT
Mary Santangelo, NYSDOT
Julie Cowing, AKRF
file

Andrew M. Cuomo
Governor

Rose Harvey
Commissioner

New York State Office of Parks, Recreation and Historic Preservation

Division for Historic Preservation
Peebles Island, PO Box 189, Waterford, New York 12188-0189
518-237-8643
www.nysparks.com

February 20, 2014

Christopher P. Caraccilo
Cultural Resource Coordinator, Region 4
New York State Department of transportation
Albany, NY 12232

Re: FHWA/NEPA/NYSDOT/OPRHP

Dear Mr. Caraccilo:

Thank you for your February 11, 2014 submission concerning the Portageville Bridge Project, The New York State Historic Preservation Office has reviewed the Finding Document in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966.

We concur with the finding of Adverse Effect and look forward to receiving and reviewing the draft Memorandum of Agreement for the project.

Again, thank you for your submission. If anyone has any questions, or if I can be of any assistance, please call me at (518)-237-8643, ext. 3271.

Sincerely,

Julian W. Adams
Director, Bureau of Community Preservation Services

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

February 26, 2014

Michael S. Kowalczyk
Area Engineer
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, New York 12207

RE: PIN 4935.79 – PORTAGEVILLE BRIDGE PROJECT
TOWNS OF PORTAGE AND GENESEE FALLS, LIVINGSTON AND WYOMING COUNTY
SECTION 106 REVIEW PROCESS - ADVERSE EFFECT FINDING

Dear Mr. Kowalczyk:

The New York State Department of Transportation (NYSDOT) is submitting the enclosed 'Finding Documentation' for the *Portageville Bridge Project (*Project*)* to the Federal Highway Administration (FHWA), for review in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties.*

NYSDOT applied the criteria of adverse effect (36 CFR 800.5(a)(1)) to identified historic properties within the area of potential effects for the Project. In coordination with your office, and in consultation with the SHPO, NYSDOT finds the Project will have an *Adverse Effect* on historic properties under the Preferred Alternative, due to the proposed removal and demolition of the Portageville Bridge and alterations of other contributing resources within Letchworth State Park, a property listed in the National Register of Historic Places. The Finding Documentation, prepared in accordance with the standards outlined in 36 CFR 800.11(e), provides project information and materials in support of this finding.

On February 11, 2014, NYSDOT provided the Finding Documentation to the New York State Historic Preservation Office (SHPO) for review, and the SHPO concurred with the finding of Adverse Effect by letter dated February 20, 2014.

NYSDOT plans to distribute the Finding Documentation to approved Section 106 Consulting Party members for a 30 day review period, in advance of a meeting tentatively scheduled for late March 2014. This meeting will provide an opportunity for Consulting Parties to articulate their views and participate in consultation to resolve the Project's adverse effects on historic properties.

At this time, we formally request FHWA concurrence with an ***Adverse Effect*** finding for the Project, based on your review of the project documentation and the written concurrence of the SHPO. We understand that you will provide the Advisory Council on Historic Preservation (ACHP) with a copy of the enclosed documentation for their review, and will consult with the ACHP prior to the issuance of your concurrence.

If you have any questions or need additional information, please contact Christopher Caraccilo at 585-272-4833 or christopher.caraccilo@dot.ny.gov, or Mary Santangelo at 518-457-0153 or mary.santangelo@dot.ny.gov.

Sincerely,

DANIEL P. HITT, RLA
(Acting) Co-Director, Office of Environment

Enclosures: Finding Documentation with Attachments A-F
SHPO letter (2/20/14)

cc: Robert Davies, FHWA
Julian Adams, OPRHP / SHPO (letter only)
Christopher P. Caraccilo, NYSDOT Region 4
Raymond F. Hessinger, NYSDOT Main Office

U.S. Department of Transportation
Federal Highway Administration

New York Division

Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207
518-431-4127
Fax: 518-431-4121
New York.FHWA@dot.gov

May 30, 2014

In Reply Refer To:
HED-NY

Mr. Daniel Hitt, RLA
Acting Co-Director, Office of Environment
New York State Department of Transportation
50 Wolf Road
Albany, NY 12232

Subject: PIN 4935.79 – Section 106 Consultation
Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming Counties

Dear Mr. Hitt:

Please reference your February 26 letter requesting our review and confirmation that the requirements of 36 CFR Part 800 have been met for the subject project. You reviewed the supporting material and concluded that the proposed undertaking, involving the removal and demolition of the Portageville Bridge and alterations of other contributing resources, will have an *Adverse Effect* on Letchworth State Park, a property that is listed in the National Register of Historic Places. You notified the State Historic Preservation Officer (SHPO), the Seneca Nation of Indians, the Tonawanda Seneca Nation, and the Tuscarora Nation of your recommendation.

A Section 106 Consulting Parties meeting was also held on March 20, which afforded all the Section 106 Consulting Parties the opportunity to give comments on the project in regards to the Section 106 process or provide written comments by April 8. As part of the Section 106 consultation process, FHWA, in coordination with NYSDOT, and in consultation with the NYS Historic Preservation Office (SHPO), will consider the view of the Section 106 Consulting Parties in seeking ways to mitigate adverse effects on historic properties. All of the Section 106 Consulting Parties will be afforded the opportunity to review the Draft Memorandum of Agreement (MOA), provide comments, and sign the Final MOA for the subject project.

The SHPO has reviewed the project in accordance with Section 106 of the National Historic Preservation Act and their letter dated February 20 offers an opinion that the project will have an *Adverse Effect* on historical properties eligible or included on the National Registers of Historic Places.

The Seneca Nation of Indians has reviewed the project in accordance with Section 106 of the National Historic Preservation Act and their letter dated May 20 considered the project to have *No Adverse Effect* on historical properties eligible for or included on the National Register of Historic Places. A cultural enhancement consisting of and interpretive kiosk in Letchworth State Park will acknowledge the cultural importance of the area to the Seneca Nation.

The Tonawanda Seneca Nation and the Tuscarora Nation have reviewed the project in accordance with Section 106 of the National Historic Preservation Act and have not issued an opinion within the 45 day review period, therefore we assume they agree with the above recommendation.

We reviewed the scope of the project, the information submitted, SHPO's opinion letter dated February 20, and concluded that the proposed undertaking, involving the removal and demolition of the Portageville Bridge and alterations of other contributing resources, will have an *Adverse Effect* on Letchworth State Park, a property that is listed in the National Register of Historic Places.

We have also notified the Advisory Council on Historic Preservation by letter dated March 5 in which NYSDOT was carbon copied. We received the Advisory Council on Historic Preservation response dated March 27 indicating that their participation in the consultation to resolve the adverse effect is not needed.

Pursuant to 36 CFR §800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the New York State Historic Preservation Office (SHPO), and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the MOA and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

If you have any questions, please feel free to contact me at (518) 431-8892.

Sincerely,

Michael S. Kowalczyk
Area Engineer

cc: J. Adams, SHPO (09PR04063)
C. Caraccilo, NYSDOT Region 4
M. Bach, SNI
J. Toth, SNI
Chief Darwin Hill, TSN
Chief Leo R. Henry, TN

Appendix C: Historic and Cultural Resources

C-2 Section 106 Finding Documentation

FINDING DOCUMENTATION

SECTION 106 EFFECT FINDING

PIN: 4935.79.101

SHPO PROJECT REVIEW NUMBER (08PR04896)

PORTAGEVILLE BRIDGE PROJECT, WYOMING AND LIVINGSTON COUNTIES

1. PROJECT DESCRIPTION

OVERVIEW

The Portageville Bridge Project (Project) is a federally funded project being undertaken by the Norfolk Southern Railway Company (Norfolk Southern) with the Federal Highway Administration (FHWA) serving as the federal lead agency for review under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act of 1966 (NHPA). The New York State Department of Transportation (NYSDOT) is serving as a joint lead agency. The purpose of the Project is to address the existing deficiencies at Norfolk Southern's Portageville Bridge (also known as the "Portage High Bridge") by providing a modern rail crossing of the Genesee River that is capable of carrying current industry standard freight rail loads, to the greatest degree possible meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. This will enable Norfolk Southern to provide safe, reliable, and efficient rail operations on the Southern Tier route in the State of New York. These operations are critical to the economic viability and growth of the Southern Tier and other affected areas of New York. The Southern Tier route passes through Letchworth State Park, which is listed on the State and National Registers of Historic Places (S/NR). The existing rail crossing, the Portageville Bridge or Portage High Bridge, is one of the contributing elements to that listing.

The existing Portageville Bridge (the Portage High Bridge) was built in 1875 and is a single-track, truss structure that spans approximately 819 feet across the Genesee River gorge. It is part of Norfolk Southern's Southern Tier route, which is a critical freight rail link between Buffalo and Binghamton, New York and provides connections to Canada and the Eastern Seaboard of the United States. The Portageville Bridge is a vital, yet currently deficient component of the Southern Tier route that is at the end of its useful life as a freight rail structure, and requires Norfolk Southern to restrict speed and tonnage of trains that cross the Genesee River and requires frequent inspections and repairs to maintain safe freight rail operations. The Preferred Alternative would replace the existing bridge with a new bridge on a parallel alignment approximately 75 feet to its south, and requires approximately 2.70 acres of new right-of-way to realign tracks on the east and west sides of the Genesee River in Wyoming and Livingston Counties.[1]

An Environmental Impact Statement (EIS) is being prepared in accordance with NEPA that considers a "New Bridge on Parallel Alignment/Remove Existing Bridge" Alternative (the Preferred Alternative). Based on the proposed funding and regulatory approvals initially anticipated for the Project, a Draft EIS (DEIS) was previously prepared pursuant to New York State's State Environmental Quality Review Act (SEQRA), with NYSDOT as the lead agency. The DEIS was published in November 2012, with a public review period held from November 26, 2012 through February 1, 2013 and a public hearing in January 2013. The Project's potential impacts on historic properties were assessed as part of the SEQRA DEIS in accordance with the New York State Historic Preservation Act (SHPA) of 1980, as set forth in Section 14.09 of the New York State Parks, Recreation and Historic Preservation Law. The documentation

[1] Approximately 1.94 acres are currently part of Letchworth State Park and 0.76 acres would be acquired from a private land owner.

prepared in accordance with the SHPA provides the basis for meeting obligations under Section 106, as both laws require similar procedures to identify historic properties and evaluate potential impacts. In addition, substantial consultation was undertaken with the New York's State Historic Preservation Office (SHPO), and outreach was also undertaken with Native American tribes and the public. Subsequent to that process, potential federal funding through the Congestion Mitigation and Air Quality Improvement (CMAQ) Program was identified. As a result, the Project is now subject to the NHPA.

The Section 106 review process is being progressed in accordance with its implementing regulations (36 CFR Part 800), and in coordination with the EIS. The analyses presented in the EIS anticipate an Estimated Time of Completion of December 31, 2017. Two alternatives will be evaluated in the EIS, the No Action/Maintenance Alternative and the Preferred Alternative. Each alternative is briefly discussed below:

- No Action/Maintenance Alternative. The No Action/Maintenance Alternative would retain the existing Portageville Bridge in its current configuration, subject only to required maintenance. However, given the age of the bridge, it is anticipated that it would eventually be deemed unsafe for continued freight operations and would be closed altogether for rail operations. Although the No Action/Maintenance Alternative does not meet the Project's purpose and need, NEPA requires that it be evaluated in the EIS. The No Action/Maintenance Alternative serves as the baseline condition against which the potential benefits and impacts of the Preferred Alternative are evaluated.
- New Bridge on Parallel Alignment/Remove Existing Bridge Alternative (the Preferred Alternative). The Preferred Alternative consists of a new rail bridge across the Genesee River built to support Norfolk Southern's long-term rail operations plan for the Southern Tier route. The new structure would be a single-track, 900-foot-long bridge. The centerline of the new bridge would be located approximately 75 feet south of the centerline of the existing bridge. The relocation of the bridge to the south would require realignment of the railroad approach tracks east and west of the Genesee River. Once the new bridge is complete, the old approach tracks and bridge would be removed. In addition, modifications to park elements in Letchworth State Park would be required to accommodate the new bridge foundations and shift in rail alignment. This would include relocation of a portion of the existing Park Road to make space for the new bridge structure's foundations, relocation of a small parking area (the Highbridge Parking Area) that is currently located south of the existing bridge (partly within Norfolk Southern's right-of-way) to parkland north of the right-of-way, and small relocations of the trailheads to two trails, the Mary Jemison Trail and the Gorge Trail (which are also within Norfolk Southern's right-of-way).

  Figures D-1 through D-6 in Attachment D: Location, Plans and Profiles of the Existing and Replacement Bridge depict the location of the Project and Preferred Alternative.

AREA OF POTENTIAL EFFECT

Section 106 of the NHPA requires federal agencies to delineate a project Area of Potential Effect (APE), which is defined as "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if such properties exist" (36 CFR § 800.16[d]). The APE is influenced by the scale and nature of an undertaking. The APE for the Project has been developed in consultation with the lead federal agency and the SHPO, based on proposed work activities and their potential to affect historic properties, including potential direct and indirect effects caused by the construction and operation of the proposed Project. Potential effects of the Project would be related to the construction of a new Genesee River rail crossing to the south of the existing bridge, construction of new bridge approaches on either side of the replacement bridge, removal of the existing Portageville Bridge, and the removal, relocation, or alterations of features within Letchworth State Park, including the Park Road, Highbridge Parking Area, and two trailheads.

In general, as defined by 36 CFR 800.5(a)(2), potential adverse effects on architectural resources can include both direct physical effects—demolition, alteration, or damage from construction—and indirect

effects, such as the introduction of visual, audible, or atmospheric elements that may alter the characteristics of the historic property that qualify it for inclusion in the National Register in a manner that would diminish the integrity of the property's significant historic features. Potential archaeological resources may be affected by construction activities resulting in disturbance to the ground surface such as excavation, grading, pile-driving, cutting and filling, and staging. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.

The Project has one APE; however, to facilitate the analysis of effects, the APE has been subdivided to indicate the area in which the proposed Project could cause potential direct effects and the area in which it could cause indirect effects. The APE is discussed in greater detail below and depicted in **Attachment A**.

The portion of the Project APE in which there is the potential for the Project to cause direct effects consists of the limits of disturbance for the Project, which encompasses the existing railroad and bridge alignment and areas of proposed construction to the north and south, including the area of the new railroad right-of-way for the bridge approaches as well as the area affected by the relocation of the Park Road and the Highbridge Parking Area and areas affected by temporary construction activities.

The portion of the Project APE in which indirect effects could occur encompasses an area within approximately 500 feet, ¼ mile, and ½ mile of the direct effect area. The APE includes areas that would have the most proximate and unobstructed views to the Project and areas where the replacement bridge could potentially adversely affect the character or setting of historic properties. In total, the APE encompasses areas that would be directly affected within Letchworth State Park, areas to the north and south in the park that would have the most proximate views and relationship with the elements of the park to be altered by the Project, and areas outside the park east of the Genesee River that could fall within visual and audible range of the Project. Beyond the APE, the Project would not be anticipated to alter the character or setting of historic properties as distance, topography, and view obstructing vegetation decreases the potential for adverse visual, audible, or atmospheric effects.

2. STEPS TAKEN TO IDENTIFY HISTORIC PROPERTIES

The methodology used for identifying historic properties in the Project APE is as follows.

PREVIOUSLY IDENTIFIED HISTORIC PROPERTIES

Information on resources previously listed in or determined eligible for listing in the S/NR were collected from the SHPO's inventory of historic properties, housed in Waterford, New York. The National Park Service's list of National Historic Landmarks was also consulted. The only historic property identified in the APE is Letchworth State Park (S/NR), with the bulk of the APE located in the park. This historic property is shown on the APE map in **Attachment A.** The NR Nomination Form for the park provides documentation for previously evaluated resources that contribute to the characteristics that qualify Letchworth State Park for the S/NR.

Letchworth State Park was listed on the New York State Register of Historic Places on June 16, 2003 under provisions of the SHPA. The Park was listed on the National Register of Historic Places (NR) on November 4, 2005 under provisions of the NHPA. The Park meets NR criteria A, B, C, and D and is significant at local, state, and national levels[1]:

- *Criterion A: Property associated with events that have made a significant contribution to the broad patterns of our history.* Letchworth State Park is significant in the categories of agriculture,

[1] The description of the NR criteria for which Letchworth State Park has been determined significant is taken from the NR Registration (Nomination) Form for Letchworth State Park, Section 8, June 16, 2003, pp. 1-10.

conservation, engineering, recreation/preservation, entertainment/recreation, ethnic heritage, exploration/settlement, industry, military, science, social history, and transportation.

- *Criterion B: Property is associated with the lives of persons significant in our past.* Significant persons associated with Letchworth State Park include William Letchworth and Mary Jemison.
- *Criterion C: Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.* Letchworth State Park is significant in the category of architecture for the range of historic building types, styles, and construction techniques represented throughout the park that reflect multiple layers of history; is significant in the category of art for the statue of Mary Jemison at the Council House Grounds; is significant in the category of engineering for structures in the park including the Genesee Valley Canal, the Portage High Bridge, the Mount Morris Dam, and roads, bridges, and trails built by the Civilian Conservation Corps; and is significant in the category of landscape architecture for its distinctive examples of landscape design spanning from 1860 through the 1940s.
- *Criterion D: Property has yielded, or is likely to yield, information important in prehistory or history.* The area of the park was historically occupied by early pre-Iroquoian Native Americans, through the Seneca period, and into the era of settlement and transportation development by European Americans. Letchworth State Park is a significant resource under Criterion D for both precontact and historic archaeological remains of Native American settlements, and historic resources from the European settlement period. There are 15 known archaeological sites in the park, with the potential for other precontact and historic period resources.

In total, Letchworth State Park contains approximately 14,345 acres on both sides of the Genesee River. The Genesee River follows a meandering course, some 17 miles long, through deeply cut canyons, with three large waterfalls, the Upper, Middle, and Lower Falls, located in the park at its southern end (see **Figures C-1 through C-4 of Attachment C**). The park originated as the estate of William Pryor Letchworth, who began purchasing property near the three waterfalls in 1859. Letchworth, a Buffalo merchant, social reformer, who was also dedicated to the conservation of natural resources and Native American heritage, purchased over 1,000 acres of land around the park's three waterfalls in 1859. Letchworth constructed a home—Glen Iris—on the west side of the river in what is now the south end of the park; the house now operates as the Glen Iris Inn (see **Figure C-7 of Attachment C**). Letchworth deeded his 1,000-acre estate to New York State in 1907 to the stewardship of the American Scenic and Historic Preservation Society in order to protect the land from future development and the park was established four years later. The American Scenic and Historic Preservation Society ceded the land to the State of New York as part of the state's new park system in the 1930s. During the 1920s and 30s, the park was expanded through the acquisition of land toward the north and along the east side of the Genesee River and by 1952, most of the land that makes up today's Letchworth State Park had been purchased or given to the State of New York. The American Scenic and Historic Preservation Society, and later, the Civilian Conservation Corps instituted by President Roosevelt during the Great Depression made numerous changes and improvements to the park. Today, Letchworth State Park is under the jurisdiction of the New York State Office of Parks, Recreation and Historic Preservation (OPRHP).

The National Register nomination includes 338 inventoried contributing resources located in the park. These include resources that span a period of significance from 1000 B.C. to 1952. Park elements that are identified as contributing resources include archaeological sites, as well as built features that include, but are not limited to, bridges, trails, roads, stone walls, parking lots, historic markers, water fountains, picnic tables, benches, and fireplaces and buildings including the Glen Iris Inn, cabins, comfort stations, and picnic shelters. The NR nomination also includes 147 non-contributing properties, a number of which are listed as non-contributing due to age only.

Contributing Resources to Letchworth State Park in the APE

The APE contains a number of resources that contribute to the significance of Letchworth State Park. These include the Portageville Bridge, three trails (the Gorge Trail, the Mary Jemison Trail, and the Genesee Valley Greenway/Finger Lakes Trail), Glen Iris, remnants of the Genesee Valley Canal system, a portion of the Park Road, several parking lots including the Highbridge Parking Area and parking lots located at Glen Iris Inn and the Upper and Middle Falls Picnic Area, scenic overlooks including those at the Middle Falls and at Glen Iris, structures at the Upper and Middle Falls Picnic Area including comfort stations, picnic shelters, and stone picnic tables and water fountains, and fieldstone walls.

PREVIOUSLY UNIDENTIFIED HISTORIC PROPERTIES

A field survey and documentary research to identify if there were buildings, structures, or objects of potential S/NR significance that had not previously been identified was undertaken in the portion of the APE outside the boundaries of Letchworth State Park by an architectural historian who meets the National Park Service (NPS) Professional Qualification Standards for Architectural History, codified under 36 CFR Part 61. No such resources were identified.

Archaeological Resources

Due to the known Native American and historical use of the area and presence of cultural resources within Letchworth State Park, a series of archaeological investigations were undertaken in the direct effects portion of the APE to establish presence or absence of previously undocumented archaeological resources based on the standards of the *New York State Education Department Cultural Resources Survey Program Work-Scope Specifications for Cultural Resources Investigations (NYSED 2004)* and *Standards for Cultural Resources Investigations and the Curation of Archaeological Collections* prepared by the New York Archaeological Council (1994) and endorsed by the OPRHP. Investigations to identify archaeological resources typically proceed in a two-phase process generally consisting of Phase I (determining the presence of archaeological resources through documentary research and field testing), and Phase II (collecting sufficient data to evaluate NR eligibility).

A Phase I Cultural Resources Reconnaissance Survey Report was prepared for the APE for direct effects. Based on the conclusions of the Phase I report, Phase II archaeological investigations were undertaken. The Phase I Cultural Resource Reconnaissance Survey was conducted by Hartgen Archeological Associates, Inc. in August 2009. Following completion of that report, as the Project design evolved, its disturbance footprint expanded, and additional areas that then fell within the APE for direct effects were subject to Phase IB field investigations. The results of these subsequent investigations were summarized in an Addendum to the Phase I report, also prepared by Hartgen Archeological Associates, Inc., dated June 20, 2012. The Phase I reports concluded that the east portion of the APE (on the east side of the Genesee River in Livingston County) was sensitive for 19th and 20th century historic-period archaeological resources.

Therefore, Phase II archaeological investigations were completed in November 2010, and the results of the Phase II testing were summarized in an End of Fieldwork Letter dated January 27, 2011 and in a subsequent Phase II Archaeological Investigation report dated April 2011. The Phase II archaeological investigations were designed to define site boundaries, including to determine the vertical and horizontal limits of the site, and to collect sufficient archaeological data for an assessment of NR eligibility of the archaeological resources identified by the Phase I report in the APE on the east side of the Genesee River. Within the APE to the west of the Genesee River, no archaeological resources were identified as a result of field investigations.

The results of these investigations are summarized below. The SHPO has concurred with the findings of the archaeological investigations.[1]

Pre-Contact Archaeological Resources

In general, the occupation of the Genesee River Valley has been well documented for the entire prehistoric period prior to European Contact including the Paleo-Indian, Archaic, and Woodland periods (ca. 9,000 years B.C. through A.D. 1600). The location and proximity of the APE to previously identified pre-Contact archaeological sites suggest a moderate to high sensitivity for pre-Contact archaeological resources within the boundaries of the APE. Shovel test pits (STPs) excavated on the east side of the Genesee River during the Phase I survey uncovered two prehistoric artifacts (a stone flake and a prehistoric tool fragment) which were recovered from a disturbed context on the north side of the existing bridge berm. Testing in another location as part of the Phase II investigations, also on the east side of the Genesee River, uncovered a small assemblage of pre-Contact material consisting of 13 chert trim flakes (waste material associated with stone tool manufacture). Both deposits represent discrete and isolated finds with a limited horizontal and vertical distribution. Therefore, the pre-Contact deposits were not identified as NR-eligible.

Historic-Period Archaeological Resources

The Revolutionary War in the late 18th century brought about the end of Native American occupation of the Genesee River. After the war ended, towns were established in the area and development quickly changed the landscape. The fertile soils lining the Genesee River were among the most attractive lands for the new population.

Settlement of the eastern and western sides of the river began in the early 19th century, increased with the extension of the Genesee Valley Canal into the area in the 1840s. In response to the influx of people brought by the new rail lines established in the area by the Erie Railroad, an inn known as the Cascade House was established within or immediately adjacent to the APE on the east side of the river. The Cascade House stood for more than a century and after being abandoned, burned to the ground in the 1960s. The building is depicted on historic maps as early as 1852 and it is identified on several early maps as the "Lauman House" or simply as a hotel.

The Erie Railroad was constructed in the 1850s (in the area now encompassed by the APE) and an early station house associated with the railroad is depicted on a mid-19th century map within the APE on the east side of the river. By the early 1870s, a freight depot had been constructed farther to the east and a depot had been constructed to the southwest of the Cascade House, also within the APE. By the early 20th century, residences occupied by the Patterson and Rendez families had also been constructed to the south of the APE on the eastern side of the river. No historic maps depict any structures within the portion of the APE to the west of the river.

Because of the mid-19th century historic development in the eastern portion of the APE, most notably the establishment of the Cascade House, the foundations of which are still visible, the APE on the east side of the river was considered to have high sensitivity for historic-period archaeological resources.

- *Cascade House Historic Site*

In the vicinity of the extant foundation walls of the Cascade House, Phase I testing revealed a wide variety of intact cultural deposits dating to the historic period. Three clusters of archaeological resources, designated as Areas (loci) A, B, and C, were identified by archaeologists. These included 19th and 20th

[1] In a letter dated September 24, 2010, the SHPO concurred with the recommendations of the Phase I report. The SHPO also concurred with the recommendations of the Addendum for the additional Phase IB field investigations in a letter dated September 4, 2012. In a letter dated May 23, 2011, the SHPO concurred with the findings of the Phase II report and indicated that the research potential of the Cascade House in the APE has been exhausted and that they have no further concerns with respect to archaeological resources.

century cultural materials including artifacts associated with domestic usage (i.e., ceramics and glass) or architectural purposes (including window glass and nails), tentatively identified as associated with the Cascade House.

The Phase II investigations yielded additional historic-period deposits associated with the 19th and 20th century development of the eastern portion of the APE.

In Area A, deposits generally containing both glass and railroad hardware, including spikes and metal fragments, were found near the railroad right-of-way within multiple layers of coal slag and soil, indicating filling and grading episodes relating to railroad construction. A concrete footing was also uncovered, and appears to be the remnant of a railroad signal tower. A small assemblage of domestic items relating to the late 19th and early 20th centuries was also uncovered.

Material encountered in Area B north of the Cascade House yielded significantly fewer domestic artifacts than encountered during the Phase IB testing and included very small architectural-related items, e.g. window glass, nails, and roofing material, associated with the former hotel structure. Though historic photographs of the Cascade House show an extensive two-story wrap-around porch and a walkway, no porch footings or evidence of the walkway were uncovered. It is possible that these features may have been removed along with the structural remains of the hotel after it was destroyed by fire. The foundations of the Cascade House are located outside the APE to the south.

Testing in Area C yielded the highest concentrations of artifacts. Material encountered was contained in a surface midden (or trash dumping area), the majority of which extends south beyond the limits of the APE. These materials consisted of a variety of domestic artifacts dating to the late 19th and early 20th centuries.

Phase II testing recovered an adequate sample of the historic-period material to assess the research potential of the three areas (A, B, and C) identified as part of the Cascade House Historic Site. No further archaeological excavations were recommended, and no NR-eligible cultural deposits were identified within the APE as tested.

Therefore, in summary, there are no NR-eligible archaeological resources within the APE.

3. EVALUATION OF PROJECT IMPACT ON IDENTIFIED HISTORIC PROPERTIES

The Project would directly affect approximately 9.3 acres within the larger approximately 14,345-acre Park. **Table 1** depicts contributing resources to Letchworth State Park and indicates those resources that would be removed, relocated, or altered as part of the Project. A description of these contributing resources and a discussion of the Project's effects are provided below

Table 1
Contributing Resources in Letchworth State Park and Summary of Changes

Name	Location	Changes – Preferred Alternative
Portage High Bridge	Crosses the Genesee River	Demolition and Removal
Glen Iris Inn & Associated Resources	West side of the Genesee River, north of the Portage High Bridge and west of the Park Road	Minor changes to viewshed, no physical changes
Gorge Trail (Trail #1)	West side of the Genesee River along the gorge	Removal and Relocation of Southern Trailhead
Mary Jemison Trail (Trail #2)	Extends between the Highbridge Parking Area and Council Grounds on the west side of the Genesee River	Removal and Relocation of Southern Trailhead
Genesee Valley Greenway/Finger Lakes Trail (Trail #7)	East side of the Genesee River along the gorge, crosses beneath the Portage High Bridge	Minor changes to viewshed, no physical changes
Genesee Valley Canal Remnants	East side of Genesee River	No Change
Park Road	West side of the Genesee River, crosses beneath the Portage High Bridge	Removal and Shift of 700 Linear Feet of the Roadway
Highbridge Parking Area & Historic Marker	West side of the Genesee River, south of Portage High Bridge and west of Park Road	Removal and Relocation
Upper and Middle Falls Picnic Area Resources	West side of the Genesee River, north of the Portage High Bridge	No changes
Fieldstone Walls	West side of the Genesee River, border Park Road and Gorge Trail (Trail #1)	Removal of Sections

PORTAGEVILLE BRIDGE (PORTAGE HIGH BRIDGE)

The Portageville Bridge, which is also known as the Portage High Bridge, was built in 1875, replacing an earlier wood bridge that was destroyed by fire. The Portageville Bridge operates as part of Norfolk Southern's Southern Tier route. The bridge is an 819-foot-long steel viaduct carrying a single railroad track approximately 245 feet above the Genesee River gorge (see **Figures C-1 through C-3 and Figures C-6 through C-8 of Attachment C**). The bridge is identified as a contributing element in the NR nomination for Letchworth State Park.

The bridge was designed by engineer George Morison, and built in a few months by the Watson Manufacturing Company of Paterson, New Jersey. The bridge was built with a single track, and composed of 13 cast and wrought iron Pratt deck trusses. It was built with approximately 1.3 million pounds of iron. The trusses were carried on six large towers, two of which are set in masonry piers in the river and four on the river banks. The bridge has subsequently undergone several alterations. In 1903-04 the superstructure was replaced, with only the bents and masonry piers retained. Approximately 260 tons of the original iron was replaced with new steel. The bridge was subsequently reinforced and modified during the 1940s. The bridge presently consists of ten plate-girder spans, and three Pratt deck trusses.

The bridge structure is at the end of its useful life as a freight rail structure and has inadequate loading capabilities. This restricts the type of traffic that can operate on it, and thereby impairs the utility of the entire segment of the Southern Tier route associated with the bridge. Due to its age and condition, unprecedented continuous monitoring has been installed, and inspections and maintenance are required on a significantly more frequent basis than at other similar facilities. Such monitoring and maintenance is costly, time-consuming, and inefficient, as well as dangerous to undertake and requires safety measures to be undertaken due to the bridge's height and location above the Upper Falls. In 2009, Norfolk Southern

closed the Southern Tier route for three days to allow for an emergency inspection and repair of the bridge after a structural crack, broken rivets, and a broken structural I-bar were found on the bridge. Due to its condition, train speeds have been reduced from a typical 35 MPH limit to 10 MPH.

A number of alternatives were explored that assessed the feasibility of retaining the Portageville Bridge in relation to the Project's purpose and need:

- Repair/Retrofit Existing Bridge: Under this alternative, the Portageville Bridge would be repaired and retrofitted to the capacity needed to meet current and future freight transport needs. This would require each of the bridge's deficient members to be strengthened or replaced, which could impact the integrity of the historic bridge structure. The necessary repairs and retrofits could not be feasibly undertaken while the Portageville Bridge is open to rail traffic, and therefore would involve closures of the existing bridge for certain rehabilitation activities, resulting in the rerouting and partial cessation of train traffic for up to 18 months. The rerouting of rail traffic would incur extensive costs and delays and result in the potential permanent loss of Norfolk Southern's affected customers. Repairing and retrofitting the bridge would also not effectively extend the bridge's useful life or improve the efficiency of rail operations, and even with repairs and retrofits, fatigue and corrosion would continue to degrade structural elements of the bridge, which would continue to incur substantial maintenance and inspection requirements, and would accelerate over time as the structure continues to age. Therefore, this alternative would not be feasible and prudent and does not meet the Project's purpose and need.
- New Bridge on Parallel Alignment/Convey Existing Bridge: This alternative would involve construction of a new rail bridge approximately 75 feet south of the existing bridge, with the existing bridge remaining for a non-railroad purpose under new ownership. Rail tracks would be modified for about 1,200 feet on either side of the bridge to accommodate the new bridge alignment. Maintenance, repairs, and any modifications to the existing bridge would be the responsibility of the new owner. However, OPRHP has made clear it cannot take responsibility for the existing bridge and no suitable owner has been identified for the existing bridge. Without a suitable owner to take responsibility for the existing bridge, this alternative is not feasible. Moreover, while this alternative would allow the bridge to remain in place, it would not entirely avoid removal of some components of the existing historic bridge and the two side-by-side bridges would be more obstructive to scenic views than a single bridge, resulting in adverse visual impacts on Letchworth State Park.
- Construct New Southern Alignment/Convey Existing Bridge: This alternative would result in the construction of a new southern alignment for Norfolk Southern's Southern Tier route outside of Letchworth State Park. The Portageville Bridge and other nearby contributing historic elements of the park would be retained, and the bridge would be conveyed to a new owner, who would be responsible for its repairs, maintenance, and other modifications since the bridge would no longer be used for rail purposes. However, this alternative is impractical and would not effectively meet the Project's purpose and need. It would require construction of a new, 4.5-mile-long rail route and related infrastructure outside of the park and would have substantial impacts on adjacent land along the route. It would involve costs that would be substantially greater than other Project alternatives and would require substantial property acquisition. Further, OPRHP has made clear it cannot take on responsibility for the existing bridge. Without a suitable owner to take responsibility for the existing bridge, this alternative is not feasible.
- Reroute Rail Traffic/Convey Existing Bridge: Under this alternative, a substantial portion of Norfolk Southern's Southern Tier route and the Portageville Bridge would cease operation and rail freight traffic would be rerouted between Binghamton and Buffalo. The bridge would be conveyed to a new owner, who would be responsible for its repairs, maintenance, and other modifications since the bridge would no longer be used for rail purposes. This alternative would

require that rail freight traffic use alternative routes between Binghamton and Buffalo, which would restrict or remove rail freight service to a number of communities, negatively affecting the region's economy. This alternative would not meet Norfolk Southern's business plan for its New York operations and would under-utilize other recent capital improvements to the Southern Tier route that have independent utility but also contribute to improved overall service along this route. This alternative would therefore not meet the Project's purpose and need and may result in an adverse effect to the historic structure. Further, no suitable owner has been identified for the existing bridge; OPRHP has made clear it cannot take on this responsibility. Without a suitable owner to take responsibility for the existing bridge, this alternative is not feasible, and for the reasons noted above, this alternative is not prudent and feasible.

These alternatives were rejected because 1) they were not feasible—in other words, they could not be built as a matter of sound engineering practice; 2) they did not meet the Project's purpose and need, which is to upgrade or replace the existing bridge so that the Genesee River crossing can meet modern freight rail capacity and weight standards and to maintain acceptable levels of safety; or 3) they presented engineering, operational, and environmental concerns that made them imprudent.

The Preferred Alternative would demolish the Portageville Bridge, including its support piers in the Genesee River, to allow the Project to meet its goals and objectives with respect to operation and safety. Visual simulations included in **Attachment E** depict views of the existing Portageville Bridge and the proposed new bridge from different vantage points in Letchworth State Park. Construction of a new bridge to the south of the existing bridge would require removal or alterations of other contributing resources in Letchworth State Park, as discussed below.

GORGE AND MARY JEMISON TRAILS

Portions of two trails that are contributing resources to the park's S/NR listing fall within the direct effects portion of the APE. The Gorge Trail (Trail #1) runs approximately seven miles along the west bank of the Genesee River (see **Figures C-5 and C-6 of Attachment C**). The trail is one of the oldest in the park, and originated as a footpath of the Seneca Indians during the 1700s. The trail is bordered by stone walls and has stone stairs at various points. The trail provides vistas of the Genesee River gorge, its waterfalls, and in a number of locations, the Portageville Bridge.

The Mary Jemison Trail (Trail #2) extends west from a small parking lot (the Highbridge Parking Area) located west of Park Road and just south of the Portageville Bridge, also on the west bank of the Genesee River (see **Figure C-6 of Attachment C**). It is a gravel and dirt path that extends 2.5 miles from the parking lot to a site known as the Council Grounds, primarily through woodland.

The Preferred Alternative would require the removal and relocation of the southern trailheads of the Gorge and Mary Jemison Trails.

PARK ROAD

The main park road (known as Park Road) is a contributing element of Letchworth State Park, with the southern portion of the road originally laid out by William Letchworth and the American Scenic and Historic Preservation Society (see **Figures C-5 and C-6 of Attachment C**). It is a paved two-lane road bordered by low fieldstone walls that crosses beneath the Portageville Bridge in the APE. The Preferred Alternative would result in a westward shift of approximately 700 linear feet of Park Road at the Portageville Bridge. This westward shift is required to move the road out of the area where new bridge foundations are proposed in the western gorge wall.

HIGHBRIDGE PARKING AREA

The small Highbridge Parking Area located west of Park Road and south of the Portageville Bridge, located partially in Norfolk Southern's right-of-way, is a contributing resource to Letchworth State Park. The parking lot is paved and was constructed before 1940 (see **Figures C-5 and C-6 of Attachment C**).

The Highbridge Parking Area provides access to the beginning of the Gorge Trail (Trail #1) located across Park Road, and to the beginning of the Mary Jemison Trail (Trail #2), which is accessed from the west end of the parking lot. As the Highbridge Parking Area is located within the new rail right-of-way of the Preferred Alternative, the parking area would be removed and relocated to parkland north of the railroad right-of-way.

HIGHBRIDGE PARKING AREA HISTORIC MARKER

A historic marker is located at the small Highbridge Parking Area near the Portageville Bridge (see **Figure C-6 of Attachment C**). The marker consists of a metal sign set on a wood post that reads "Portage Bridge Replaces Largest Wooden Bridge in the World Built in 1852. 300 acres of Timber used in Construction. Burned in 1875." The marker indicates it was installed by the State Education Department in 1935. When the Highbridge Park Area is relocated under the Preferred Alternative, the historic marker that describes the former 1852 bridge would also have to be relocated.

FIELDSTONE WALLS

Fieldstone walls were built by William Letchworth, the American Scenic and Historic Preservation Society, the Civilian Conservation Corps, and the Genesee State Park Region throughout the park and border portions of the Park Road and the Gorge Trail (Trail #1). See **Figures C-5 and C-6 of Attachment** C). Fieldstone walls would be removed as part of the shifting of the Park Road at the Portageville Bridge and the removal and relocation of the trailhead of the Gorge Trail (Trail #1).

OTHER CONTRIBUTING RESOURCES

The Project would not result in direct effects to other contributing resources in Letchworth State Park. The Glen Iris Inn, built by William Letchworth, is located approximately ½ mile north of the Portageville Bridge on the west side of the Genesee River in the indirect effects portion of the APE. It is a two- and three-story frame house built in the mid 19th century and designed in the Greek Revival style (see **Figure C-7 of Attachment C**). The house has a wrap-around two-story colonnade capped by a balustrade and has a gable roof. The Glen Iris Inn has a large lawn lined with trees. A stone terrace faces the Genesee River gorge, and provides an overlook above the Middle Falls. Other contributing elements associated with the Glen Iris Inn include a metal plaque honoring William P. Letchworth, located above the Middle Falls on the low stone wall bordering the Glen Iris Inn overlook. The plaque reads "In Grateful Memory of William Pryor Letchworth L.L.D. Humanitarian Conservationist Donor of Glen Iris and His Estate Comprising the Original 1000 of the Park Includes Upper, Middle, and Lower Falls so that this Gorge Might Remain a Place of Inspiration and Beauty Forever." A number of parking lots associated with the Glen Iris Inn and landscaping elements, including memorial trees, are also contributing elements. The Portageville Bridge is only partially visible from the stone terrace that faces the Genesee River gorge and that provides an overlook above the Middle Falls; the bridge is visible above and behind the tree canopy of the Upper and Middle Falls Picnic Area (see **Figure C-4 of Attachment C**). The bridge is not visible from other locations at the Glen Iris Inn, including the lawn and colonnaded porch.

On the east side of the Genesee River, the Genesee Valley Greenway/Finger Lakes Trail (Trail #7) runs along the gorge. The path follows the route of the former Pennsylvania Railroad, and railroad ties and also remnants of the preceding Genesee Valley Canal system are visible. The Genesee Valley Canal was constructed in the mid 19th century, with the goal of providing a navigable canal from the Erie Canal in Rochester through the Genesee Valley to the Allegany River. The canal was completed in 1863, but was never financially successful and was abandoned in 1878, as its transportation benefits were supplanted by those of railroads. The trail and elements of the former Genesee Valley Canal, including railroad remains, are contributing resources of Letchworth State Park in the indirect effects portion of the APE. The Genesee Valley Greenway Trail crosses beneath the existing railroad bridge structure. From locations close to the bridge, views of the existing bridge are available (see **Figure C-7 of Attachment C**). In most other locations, the Portageville Bridge is not visible due to trees and dense vegetation.

Other contributing elements in indirect effects portion of the APE include stone walls, scenic overlooks, including those at the Middle Falls and at Glen Iris, and elements associated with the Upper and Middle Falls picnic area, located north of the Portageville Bridge. These include comfort stations and picnic shelters built in 1929/1930, stone picnic tables and water fountains, and stone steps leading from the upper to lower parts of the picnic area. The large paved Upper and Middle Falls parking lot is also a contributing element constructed circa 1930. The Portageville Bridge is visible from the edge of the Upper and Middle Falls picnic area along the gorge (see **Figure C-8 of Attachment C**), but has a limited visibility from within the interior portions of this recreational area due to trees and dense vegetation that obscure most views.

DISCUSSION OF PROJECT EFFECTS

The Project would change the park's setting in the area where direct effects would occur and in proximity to this area, as the alignment of the railroad right-of-way in the park would shift to the south by approximately 75 feet. However, the railroad, its alignment, and infrastructure, including a bridge crossing the Genesee River gorge, have been part of the setting of the park since the mid-19th century. The replacement bridge would be anticipated to have similar visibility from different vantage points in the park as the Portageville Bridge, since the replacement bridge would cross the gorge close to the existing bridge alignment and because of its location to the south, would appear to be at a lower elevation than the existing bridge in the viewshed (see visual simulations contained in **Attachment E**). With the Preferred Alternative, train speeds at the new bridge would increase from 10 MPH to 35 MPH approaching and traversing the bridge. Noise analyses performed as part of the EIS to assess noise levels associated with the operation of the Project concluded that operation of the Preferred Alternative would not result in noise impacts that would be considered severe, and, therefore, would not cause adverse audible effects to Letchworth State Park.

The Preferred Alternative would remove and demolish the existing Portageville Bridge, and permanently alter other contributing resources of Letchworth State Park, including the Gorge and Mary Jemison Trails, Highbridge Parking Area and Historic Marker, Park Road, and fieldstone walls, either through removal, relocation or modification as described above. These changes contribute to the evaluation of the Project's adverse effects on Letchworth State Park.

4. BASIS FOR RECOMMENDED PROJECT FINDING

FHWA, in coordination with NYSDOT and in consultation with the SHPO, has applied the Criteria of Adverse Effect (36 CFR 800.5(a)(1)) to identified historic properties within the APE, and finds the Project will have an ***Adverse Effect*** under the Preferred Alternative, due to the proposed removal and demolition of the existing Portageville Bridge and removal and alterations of other contributing resources within Letchworth State Park.

Measures to avoid or minimize adverse effects have been developed through extensive consultation among Norfolk Southern, OPRHP, the SHPO, FHWA, and NYSDOT in accordance with the SHPA and in compliance with Section 106.

MEASURES TO AVOID OR MINIMIZE EFFECTS

Contributing Resources – Letchworth State Park

In addition to the contributing resources located in the APE for direct effects that could be directly affected by the Project, other contributing resources are located outside of the APE for direct effects but in close proximity to possible Project construction, including portions of the Gorge, Mary Jemison, and Genesee Valley Greenway/Finger Lakes Trails and fieldstone walls. In order to avoid accidental damage to adjacent resources as a result of construction activities associated with the removal of the existing Portageville Bridge and construction of the new Genesee River railroad crossing, Norfolk Southern will prepare a Construction Protection Plan (CPP). The CPP will describe the measures that would be

implemented to protect historic park features from vibration, excavation, and damage from heavy equipment, and to control and manage fugitive dust, erosion, noise, lighting and visual effects of construction activities to the extent practicable.

Archaeological Resources

The foundation remains and most of the surrounding Cascade House property lie outside the APE. Therefore, an Avoidance Plan was prepared to ensure that construction disturbance does not inadvertently occur south of the APE in the Cascade House Historic Site. The limits of the APE (the construction limits) have been marked in the field and the Avoidance Plan stipulates that construction fencing would be placed along the perimeter of the construction limits marked in the field and as indicated on site plans.[1] The SHPO concurred with the recommendations set forth in the Avoidance Plan in a letter dated September 4, 2012.

In addition, staging area limitations will be placed on the parcel on the east approach to the Portageville Bridge between Portageville Road and the existing Norfolk Southern right-of-way, to ensure that no subsurface activities occur. This parcel lies in a historically sensitive area and the type or limits of cultural resources have not been determined.

MEASURES TO MITIGATE ADVERSE EFFECTS

A Memorandum of Agreement (MOA) will be developed to resolve adverse effects, as agreed upon through consultation. Measures to mitigate the Project's adverse effects will be included in a Draft MOA, to be developed through consultation among Norfolk Southern, OPRHP, the SHPO, FHWA, the Advisory Council on Historic Preservation (if participating), NYSDOT, and Consulting Parties established in accordance with Section 106 of the NHPA. Proposed mitigation measures developed to date among Norfolk Southern, OPRHP, the SHPO, FHWA, and NYSDOT include:

- Educational and Interpretive Materials at Letchworth State Park to include creation of an interpretive plan; salvage, conservation, and installation of a certain amount of the base of Pier 11 of the Portageville Bridge; and installation of two interpretive kiosks and an exhibit.
- Historic American Engineering Record (HAER)-Level Recordation. Additional HAER level recordation of the Portageville Bridge, including additional archival photography and a narrative that describes the physical characteristics of the Portageville Bridge and its history will be prepared.
- Restoration of Portions of the Gorge Trail. This includes salvage to the extent feasible, of stone from the walls of the portion of the Gorge Trail that will be relocated for the Project, for reuse along the relocated portion of the Gorge Trail. In addition, the portion of the existing Gorge Trail between the proposed construction zone for the Project and the Middle Falls (outside the Project limits) will be restored.

5. CONSULTING PARTY AND PUBLIC INVOLVEMENT

NYSDOT and FHWA have solicited input from Consulting Parties and the public concerning the Project's effect on historic properties. Outreach completed to date and future planned outreach to Consulting Parties and the public is described below.

CONSULTING PARTIES

- NYSDOT and FHWA have reached out to representatives of federally-recognized Native American tribes with an interest in the geographical area of the Project location. Representatives of the Seneca

[1] The construction limits that have been marked in the field will be field checked and re-marked as necessary prior to construction to ensure accuracy.

Nation of Indians, Tonawanda Seneca Nation, and Tuscarora Nation were first invited to a meeting that was held on September 9, 2010, which was attended by representatives of the Seneca Nation.[1] Subsequent to FHWA involvement in the Project, FHWA formally initiated Section 106 consultation with the Nations, inviting them to meet with FHWA and NYSDOT representatives (see **Attachment F**).

- Invitations to participate in Section 106 consultation were also extended to involved agencies, local preservation groups, and other potentially interested parties (see **Attachment F**). Seven organizations have requested Consulting Party Status and have been approved by FHWA (see **Attachment B).**
- A Section 106 information package, including this Finding Documentation, will be sent to the Seneca Nation, Tonawanda Seneca Nation, Tuscarora Nation, and other Consulting Parties, along with an invitation to a meeting of Consulting Parties to be held prior to the issuance of the Project's DEIS. Consulting Parties will be provided with the draft MOA, and will have an opportunity to offer their input at the meeting and through written comments following a 30 day review period.

PUBLIC INVOLVEMENT

- A Section 106 information table and sign-up location was provided at the November 19, 2013 Environmental Impact Statement (EIS) NEPA public scoping meeting held in Mount Morris, New York.
- The Draft Finding Documentation and Draft MOA are included in the DEIS. Upon FHWA's approval of the DEIS for public circulation and the placing of the Notice of Availability in the Federal Register thereafter, the public review period for the DEIS will begin. A public hearing will be held during the public comment period, and members of the public can offer oral testimony on the findings of the DEIS. Written comments will also be accepted.

6. ATTACHMENTS

A. Area of Potential Effect and Locations of Historic Properties

B. Public Involvement and Consulting Party Participation

- List of Section 106 Consulting Parties

C. Existing Conditions Photographs

- Figure C-1: Aerial Photograph
- Figure C-2: Map of South End of Letchworth State Park and Photograph Key
- Figure C-3: Portageville Bridge
- Figure C-4: Gorge Trail #1 and Context
- Figure C-5: Park Road, Highbridge Parking Area, and Gorge Trail #1
- Figure C-6: Park Road and Portageville Bridge
- Figure C-7: Glen Iris Inn and Context
- Figure C-8: Norfolk Southern Right-of-Way

D. Location, Plans, and Profiles of Existing and Replacement Bridge

- Figure D-1: Project Location
- Figure D-2: Current Train Routing over Portageville Bridge

---

[1] Representatives of the Tonawanda Seneca Nation were unable to attend the meeting, but were briefed after the meeting by the Seneca Nation. This meeting was held in anticipation of the Project having federal involvement, including approvals and permits by the National Park Service, United States Army Corps of Engineers, and was held prior to FHWA's involvement in the Project.

- Figure D-3: Existing Norfolk Southern Right-of-Way at Genesee River Crossing and Footprint of Existing Bridge
- Figure D-4: Existing Portageville Bridge: Plan and Elevation
- Figure D-5: Preferred Alternative Plan
- Figure D-6: Profile of Proposed New Bridge

E. Visual Simulations

- Figure E-1: Visual Simulations Viewpoint Photograph Locations
- Figure E-2: Existing Conditions – Viewpoint A
- Figure E-3: Existing Conditions – Viewpoint B
- Figure E-4: Existing Conditions – Viewpoint C
- Figure E-5: Existing Conditions – Viewpoint D
- Figure E-6: Preferred Alternative – Viewpoint A
- Figure E-7: Preferred Alternative – Viewpoint B
- Figure E-8: Preferred Alternative – Viewpoint C
- Figure E-9: Preferred Alternative – Viewpoint D

F. Correspondence

- Transmittals of September 13 -22, 2010 from NYSDOT to Native American Tribes, Phase 1 Survey Report
- Letter of September 24, 2010 from SHPO to AKRF, Inc., Phase I Survey Report
- Letter of February 24, 2011 from the Seneca Nation to NYSDOT
- Transmittals of May 9, 2011 from NYSDOT to Native American Tribes, Phase II Survey Report
- Letter of May 23, 2011 from SHPO to NYSDOT, Phase II Survey Report
- Transmittals of August 8 and 22, 2012 from NYSDOT to Native American Tribes, Phase 1B Addendum and Avoidance Plan
- Letter of September 4, 2012 from SHPO to NYSDOT, Phase IB Addendum and Avoidance Plan
- Letter of November 14, 2013 from FHWA to National Park Service
- Letters of November 14, 2013 from FHWA to Native American Tribes
- Letters of November 15, 2013 from NYSDOT to Consulting Parties
- Letters of November 18, 2013 from FHWA to Native American Tribes
- Letter of January 7, 2014 from NYSDOT to FHWA requesting approval of Seven Consulting Parties.
- Letter of January 17, 2014 from FHWA to NYSDOT approving Consulting Parties.

7. REFERENCES CITED

Cultural Resource Reconnaissance Survey Report of Norfolk Southern Railroad Bridge Crossing, Towns of Genesee Falls and Portage, Wyoming and Livingston Counties, New York, prepared by Hartgen Archeological Associates, Inc., August 2009.

End of Fieldwork Letter, prepared by Hartgen Archeological Associates, Inc., January 27, 2011 for Phase II investigations.

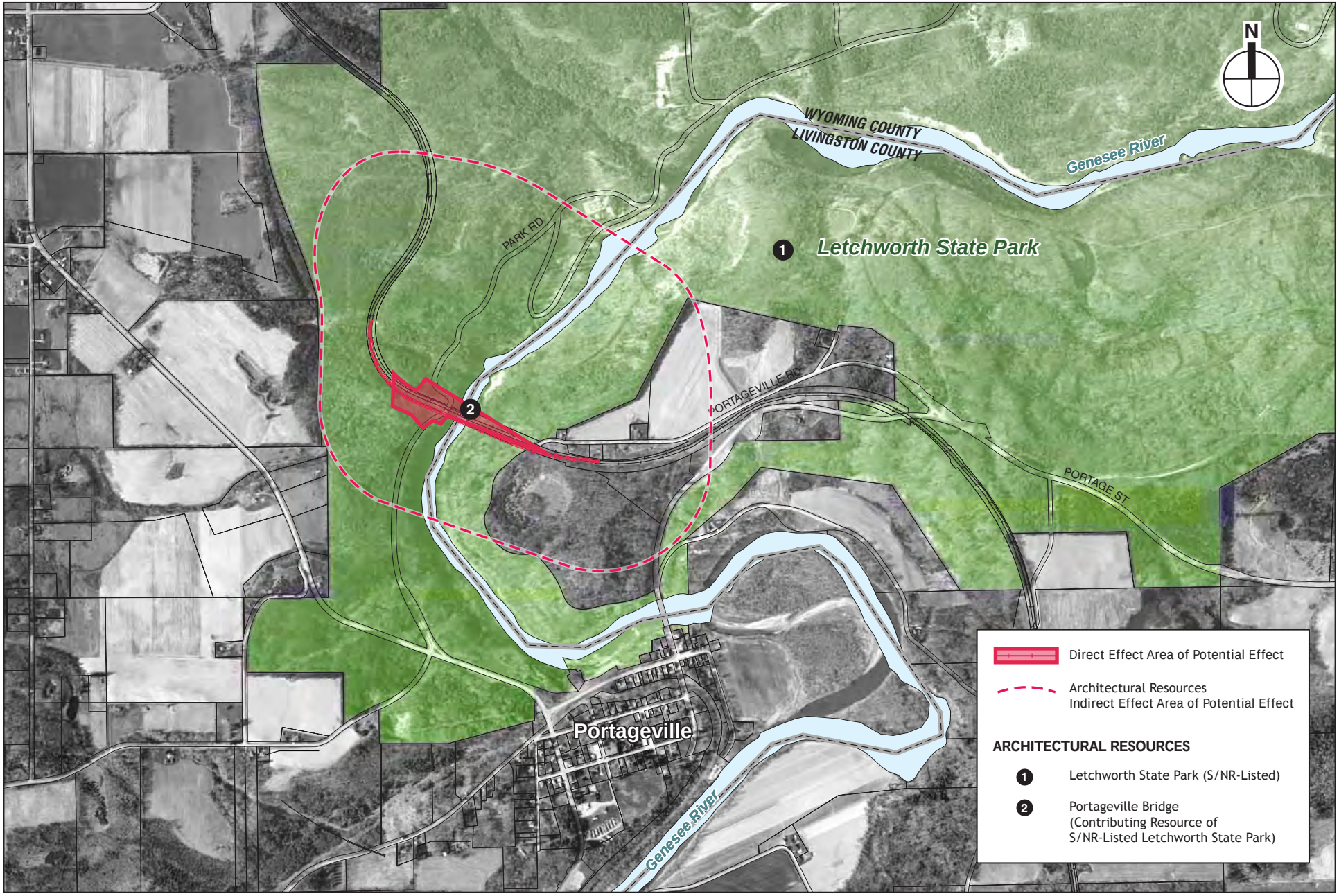
Letter Report: Addendum Phase 1B Archeological Investigation, Additions to the Norfolk Southern Portage Railroad Bridge Footprint, Towns of Genesee Falls and Portage, Wyoming and Livingston Counties, NY, HAA 4159-21 (08PR04896), prepared by Hartgen Archeological Associates, Inc., June 20, 2012.

National Register of Historic Places Registration Form, Letchworth State Park, June 16, 2003.

Phase II Archaeological Investigation, Norfolk Southern Railroad Crossing, Cascade House Historic Site (A05113.000072), Town of Portage, Livingston County, New York, prepared by Hartgen Archeological Associates, April 2011.

Portageville, NY: Bridge No. SR-361.66 – Avoidance Plan, prepared by Norfolk Southern Corporation, July 23, 2012.

2.10.14



0 1000 2000 FEET

SCALE

Area of Potential Effect and Locations of Historic Properties

Attachment A

PORTAGEVILLE BRIDGE PROJECT
SECTION 106 EFFECT FINDING

ATTACHMENT B:

PUBLIC INVOLVEMENT AND CONSULTING PARTY PARTICIPATION

PORTAGEVILLE BRIDGE
SECTION 106 CONSULTING PARTIES

NAME	ADDRESS	PHONE/EMAIL
Landmark Society of Western New York Ms. Caitlin Meives, Preservation planner	133 S. Fitzhugh Street Rochester, NY 14608	Phone: (585)-546-7029 ext. 27 Fax: (585)-546-4788 cmeives@landmarksociety.org
Friends of the Genesee Valley Greenway Edward Holmes Joan Schumaker	Box 42 Mt. Morris, NY 14510	Phone:(585)-658-2569 fogvg@frontiernet.net
HistoricBridges.Org Nathan Holth	12534 Houghton Drive DeWitt, MI 48820	Phone: (269)-290-2593 nathan@historicbridges.org
Seneca Nation of Indians Melissa Bach Tribal Historic Preservation Officer (THPO) Jay Toth, Tribal Archaeologist	90 O:hi'yoh Way Salamanca, NY 14779	Phone: (716) 945-1790, ext. 3580 Emergency: (716) 244-1735 Melissa.bach@sni.org Jay.toth@sni.org
Tonawanda Seneca Nation Chief Darwin Hill	Tonawanda Seneca Nation Office 7027 Meadville Road Basom, New York 14013	Phone: (716)-542-4244 Fax:(716)- 542-4008 tonseneca@aol.com
Tuscarora Nation Bryan Printup Tuscarora Environment Office	5226 E Walmore Road Tuscarora Nation Lewiston, NY 14092	Phone:(716)-264-6011, ext. 103 bprintup@hetf.org
NYS Office of Park, Recreation and Historic Preservation-State Parks Dave Herring, Capital Facilities Manager	One Letchworth State Park Castile, NY 14427	Phone 585-493-3602 Mobile 585-322-5671 Fax 585-493-5272 David.herring@parks.ny.gov

PORTAGEVILLE BRIDGE PROJECT
SECTION 106 EFFECT FINDING

ATTACHMENT C:

EXISTING CONDITIONS PHOTOGRAPHS

1.7.14

Aerial Photograph
Figure C-1

1.9.14

NOT TO SCALE

1 View Direction and Reference Number
(Corresponds to Figures C-3 through C-8)

Map of South End of Letchworth State Park and Photograph Key
Figure C-2

View south from the Middle Falls Scenic Overlook. **1**
Views include the Portageville Bridge and the Upper Falls

View east under Portageville Bridge from Gorge Trail #1 **2**

NOTE: See Figure C-2 for Photograph Location

Portageville Bridge
Figure C-3

View south of the Middle Falls from stone patio in from the Glen Iris Inn. The Gorge Trail #1 is also visible **3**

View south of the Lower Falls from Gorge Trail #1 **4**

NOTE: See Figure C-2 for Photograph Location

Gorge Trail #1 and Context

Figure C-4

View north on Park Road on the west side of the Genesee River, south of the Portageville Bridge. The Highbridge Parking Area is on the left **5**

View south of the Portageville Bridge from Gorge Trail #1 **6**

NOTE: See Figure C-2 for Photograph Location

Park Road, Highbridge Parking Area, and Gorge Trail #1

Figure C-5

View north on Park Road near the Highbridge Parking Area. The Portageville Bridge crosses above the road. The head of the Gorge Trail #1 is on the right **7**

View northwest of the Highbridge Parking Area. The historic bridge marker and head of the Mary Jemison Trail (Trail #2) are also visible **8**

NOTE: See Figure C-2 for Photograph Location

Park Road, Highbridge Parking Area, Mary Jemison Trail #2, and Historic Marker

Figure C-6

View of the Glen Iris Inn **9**

http://cnyhiking.com

View south on Finger Lakes Trail #7 **10**
(from pedestrian created path at the edge of the gorge)

NOTE: See Figure C-2 for Photograph Location

Glen Iris Inn and Context

Figure C-7

View west on the railroad right-of-way towards the Portageville Bridge **11**

View south of the Portageville Bridge from the Gorge Trail (Trail #1) at the Middle/Upper Falls Picnic Area **12**

NOTE: See Figure C-2 for Photograph Location

Norfolk Southern Right-of-Way and Portageville Bridge

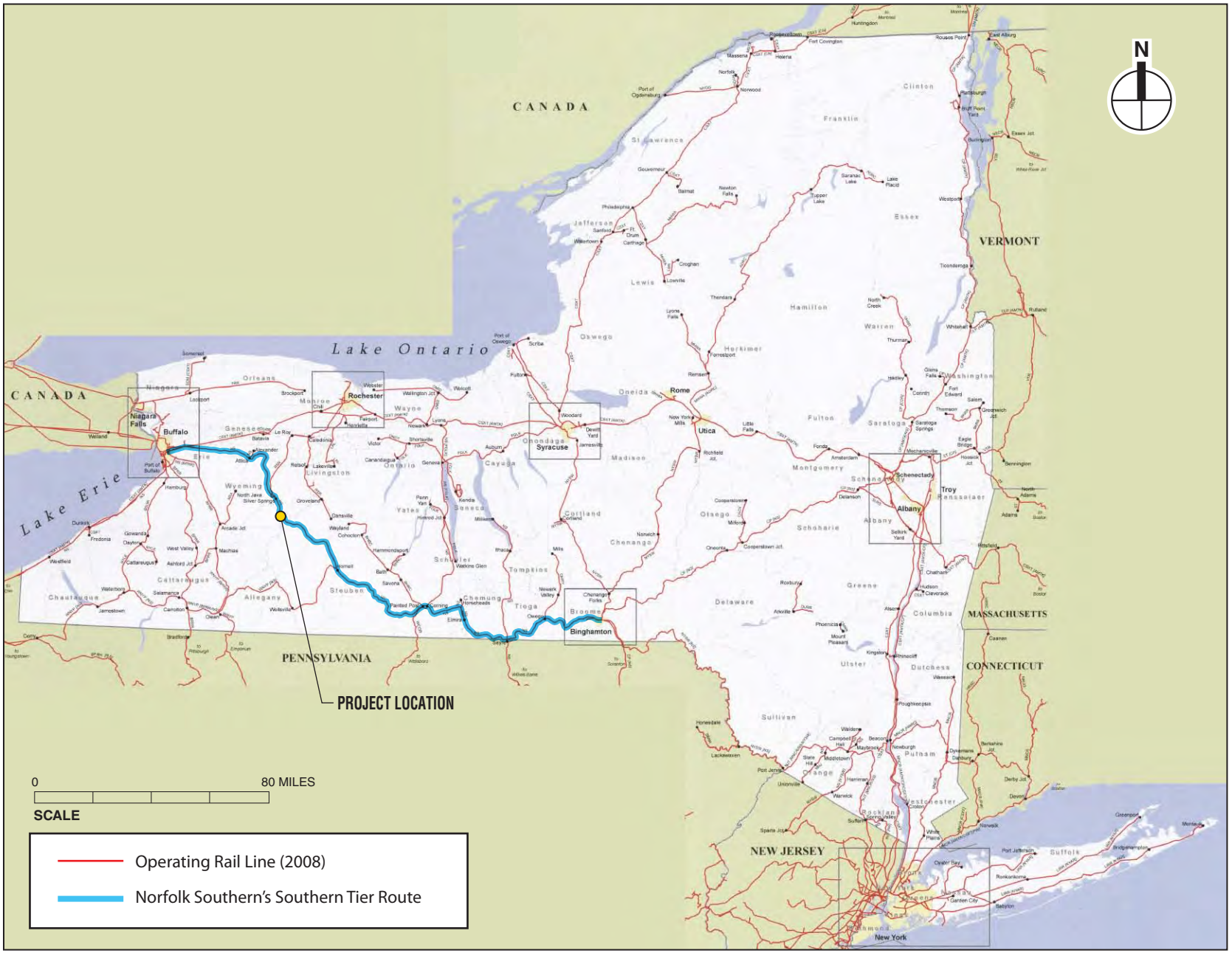
Figure C-8

PORTAGEVILLE BRIDGE PROJECT
SECTION 106 EFFECT FINDING

ATTACHMENT D:

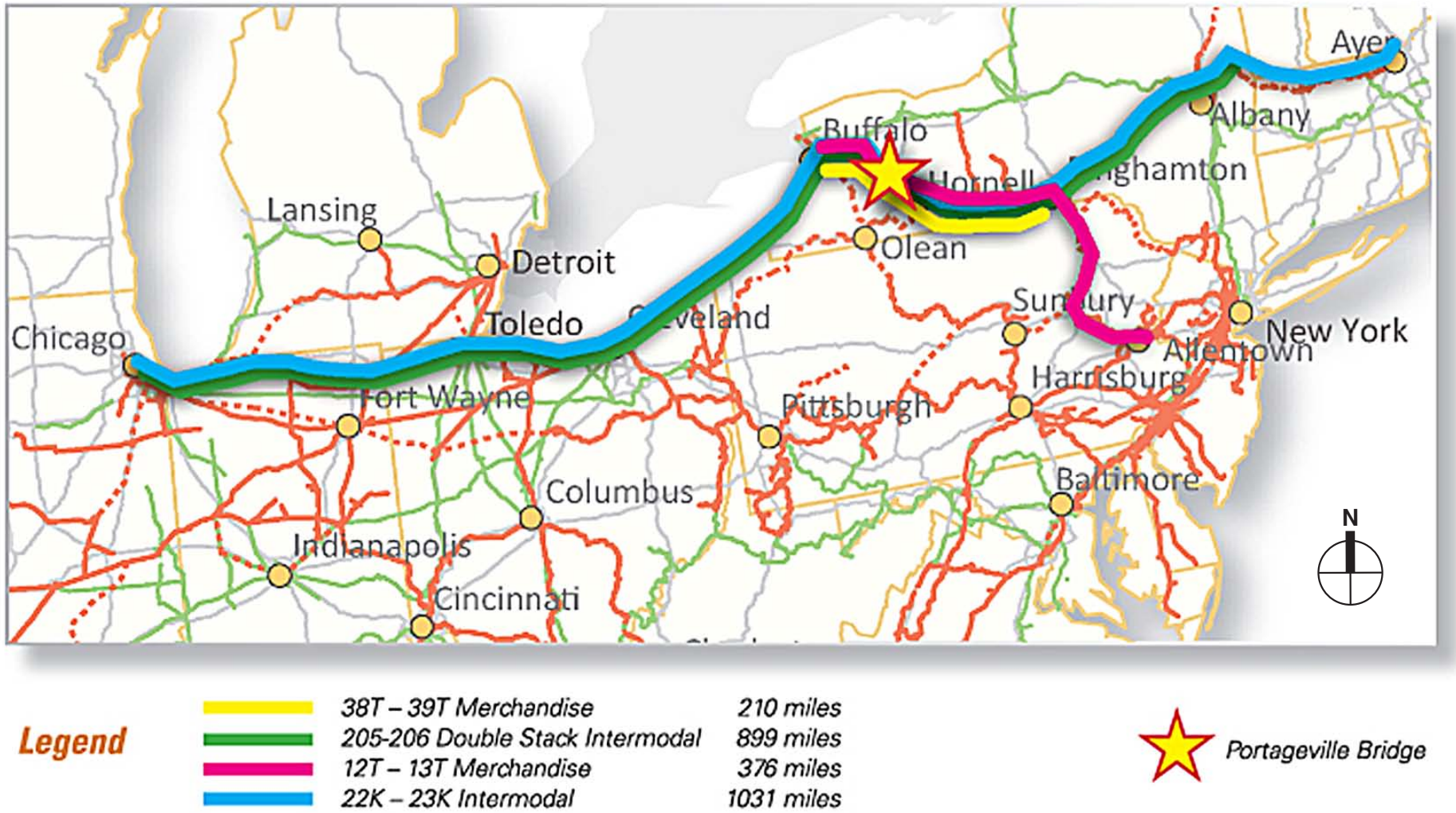
LOCATION, PLANS, AND PROFILES OF EXISTING AND REPLACEMENT BRIDGE

1.7.14



Source: New York State Rail Plan, 2009

Project Location
Figure D-1

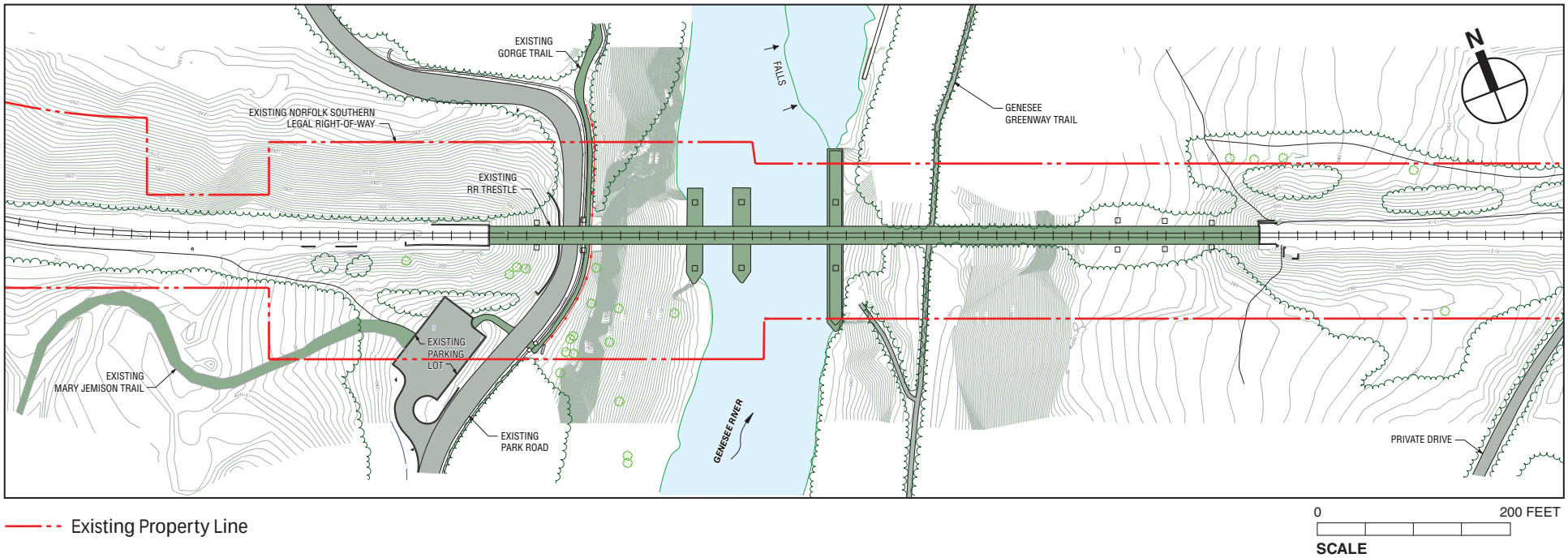


Legend

	38T – 39T Merchandise	*210 miles*
	205-206 Double Stack Intermodal	*899 miles*
	12T – 13T Merchandise	*376 miles*
	22K – 23K Intermodal	*1031 miles*

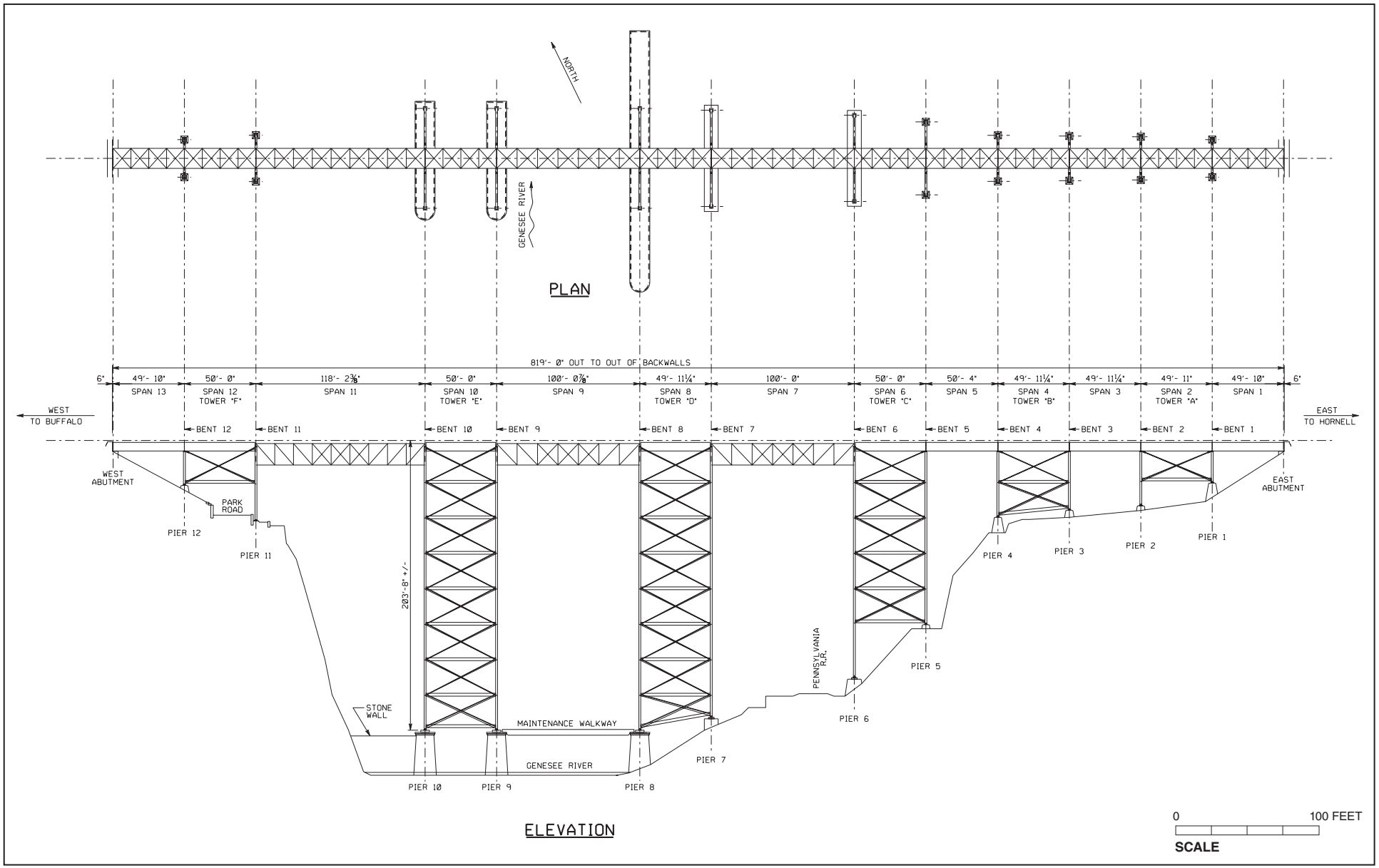
Portageville Bridge

Current Train Routing over Portageville Bridge
Figure D-2



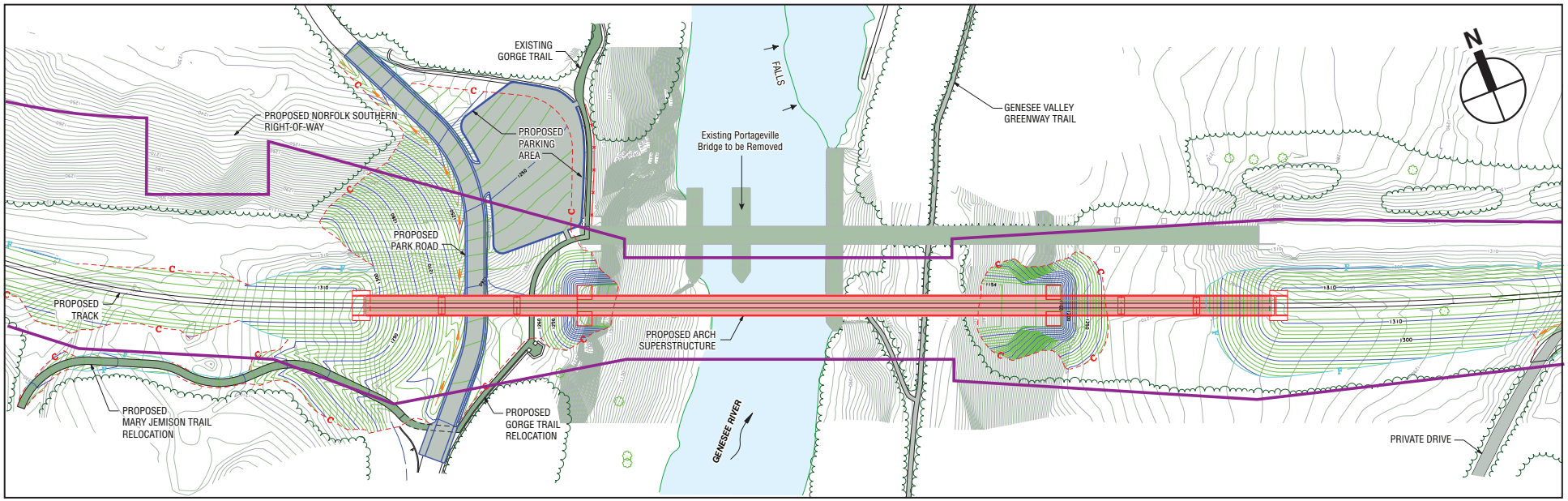
Existing Norfolk Southern Right-of-Way at Genesee River Crossing and Footprint of Existing Bridge

Figure D-3



Existing Portageville Bridge: Plan and Elevation

Figure D-4



Proposed Property Line

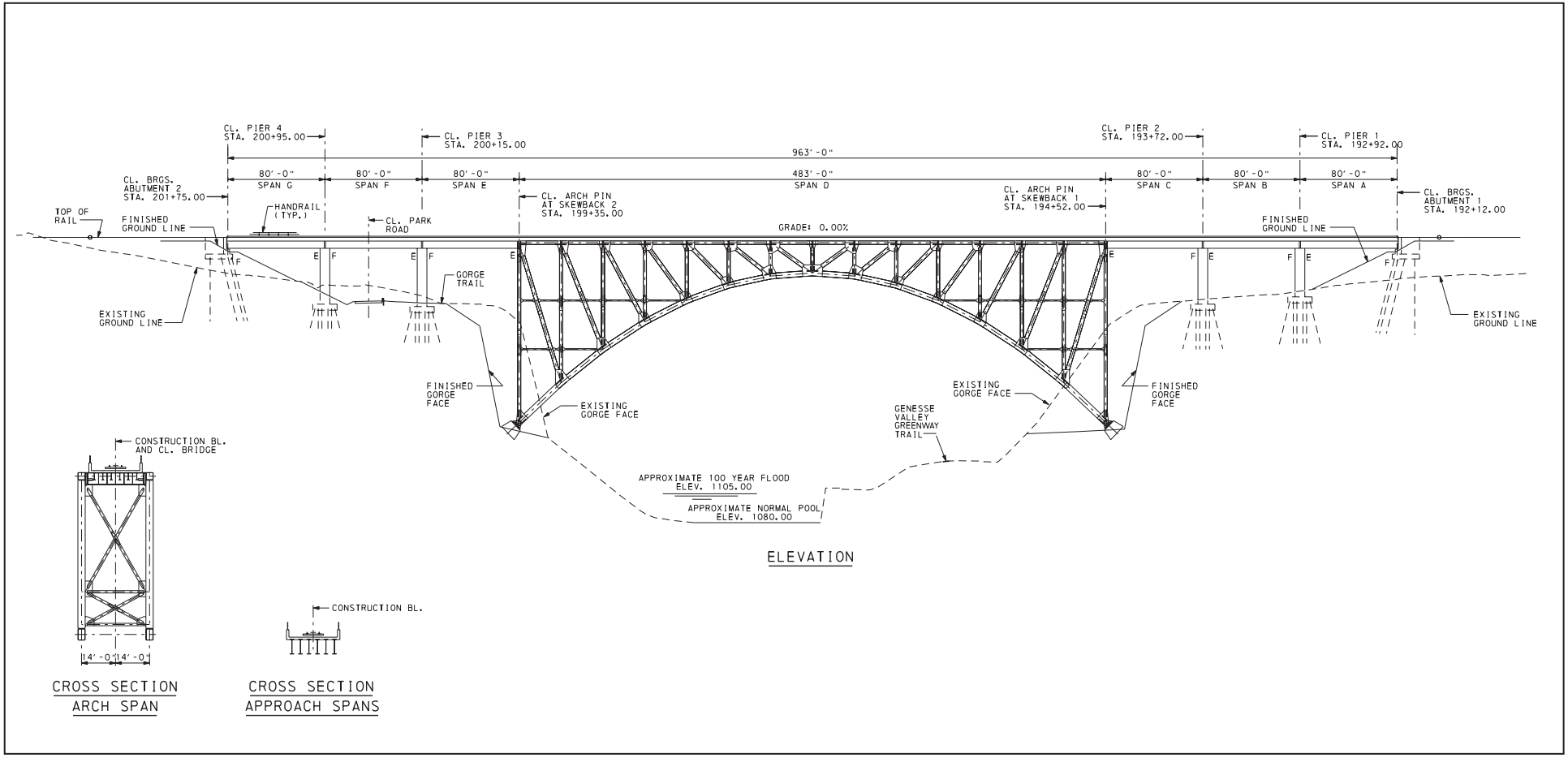
Areas of Proposed Cutting

0 200 FEET

SCALE

Preferred Alternative

Figure D-5



0 100 200 FEET

SCALE

Pro□le of Proposed New Bridge

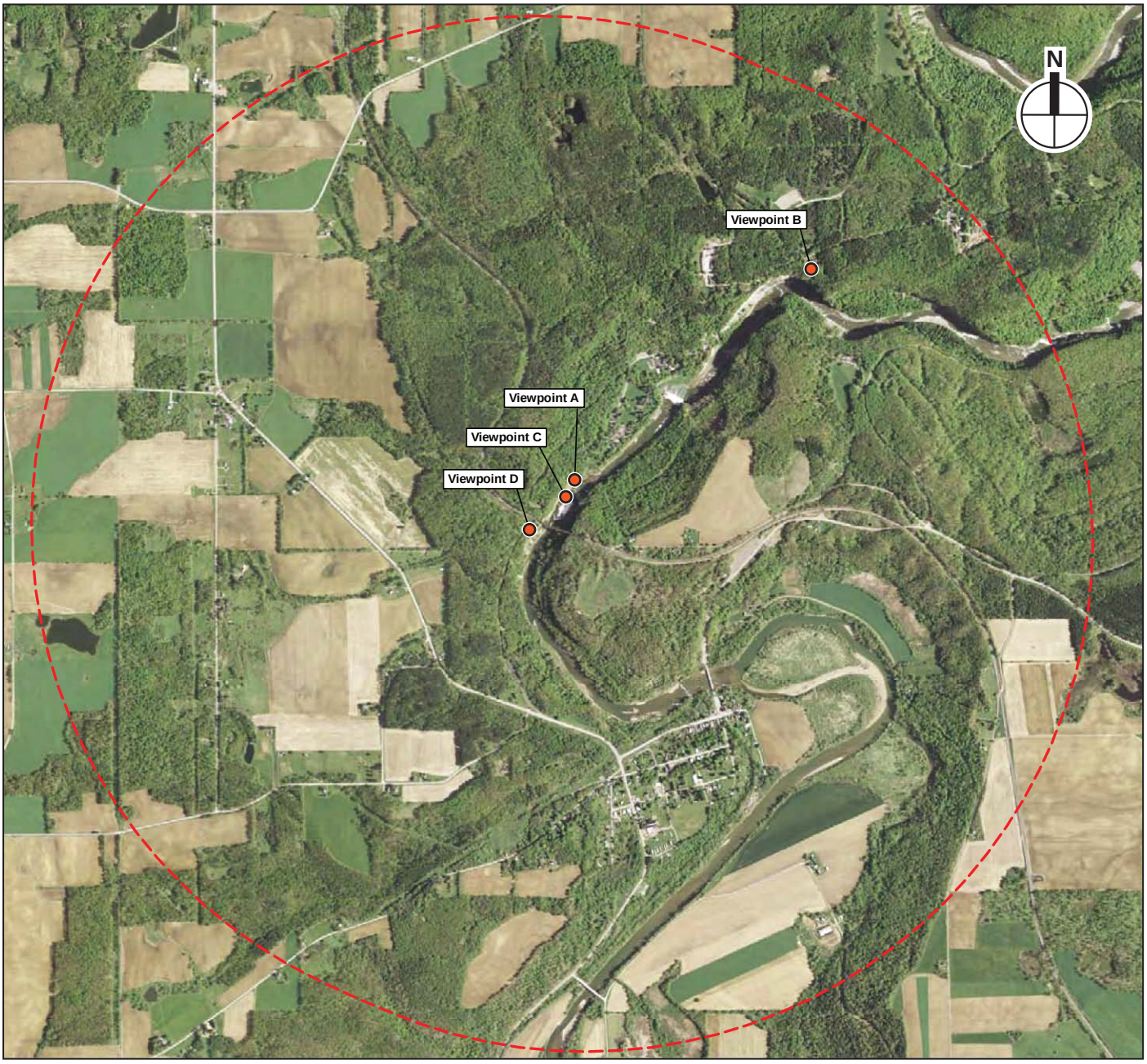
Figure D-6

PORTAGEVILLE BRIDGE PROJECT
SECTION 106 EFFECT FINDING

ATTACHMENT E:

VISUAL SIMULATIONS

1.7.14



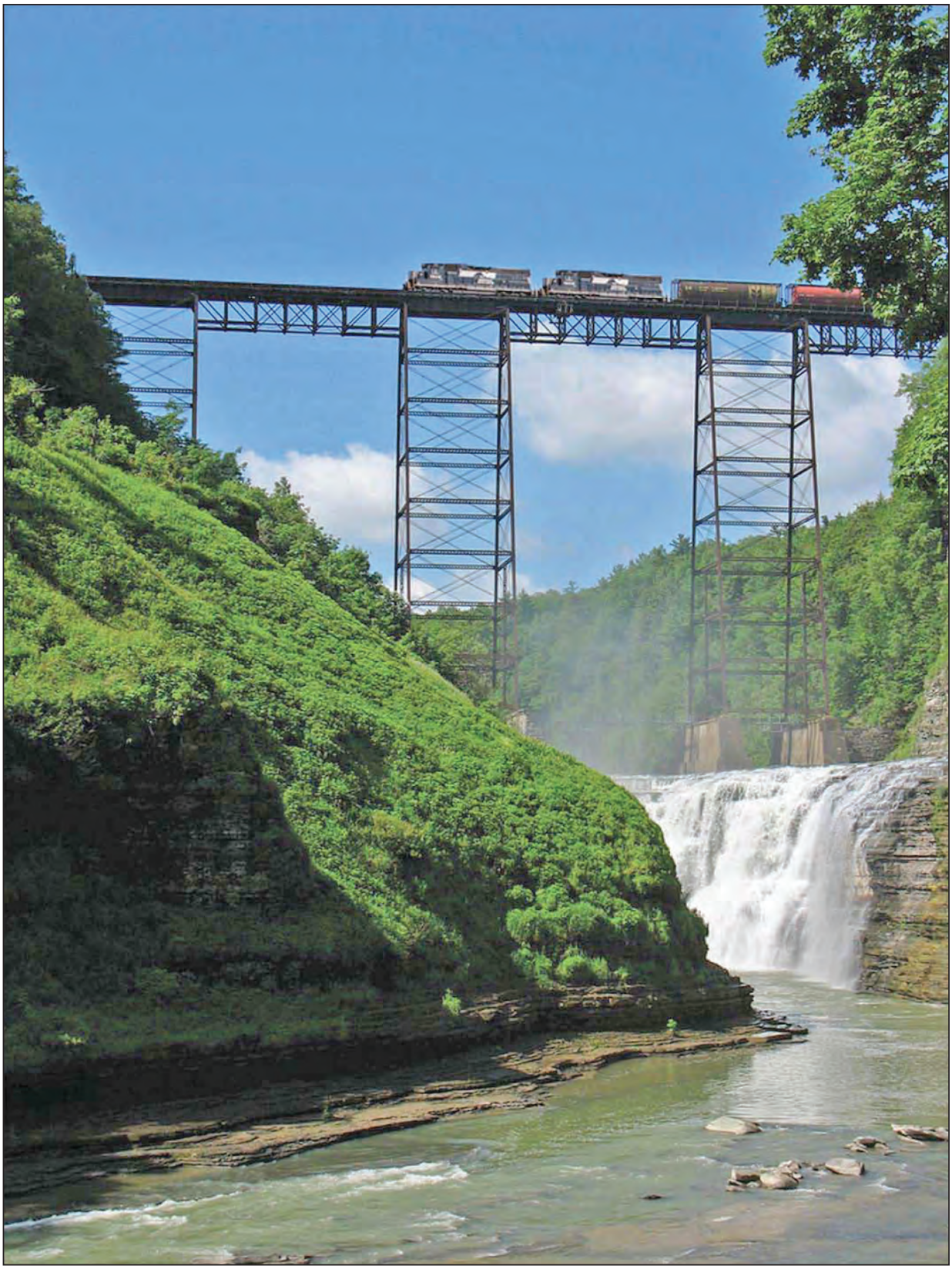
Sources: USDA Geospatiaal Gateway

Viewpoint Photograph Location
(Corresponds to Figures E-2 through E-9)

1-1/2-Mile Radius

0 3000 FEET
SCALE

Visual Simulations
Viewpoint Photograph Locations
Figure E-1



Existing Conditions

Existing Conditions – Viewpoint A
Figure E-2

Existing Conditions

Existing Conditions – Viewpoint B

Figure E-3

Existing Conditions

Existing Conditions – Viewpoint C

Figure E-4

Existing Conditions

Existing Conditions – Viewpoint D

Figure E-5

New Bridge

Preferred Alternative – Viewpoint A

Figure E-6

New Bridge

Preferred Alternative – Viewpoint B

Figure E-7

New Bridge

Preferred Alternative – Viewpoint C

Figure E-8

New Bridge

Preferred Alternative – Viewpoint D

Figure E-9

PORTAGEVILLE BRIDGE PROJECT
SECTION 106 EFFECT FINDING

ATTACHMENT F:

CORRESPONDENCE

NEW YORK STATE
DEPEARTMENT OF TRANSPORTATION
REGION 4 DESIGN

1530 Jefferson Road
Rochester, New York 14623-3161

Ph. (585) 272-3360 Fax. (585) 272-7547

LETTER OF TRANSMITTAL

Sept 22, 2010

Subject: Norfolk Southern Railroad-Portageville Bridge, Livingston & Wyoming Counties

To: Curtis Lazore
Haudenosaunee Cul. Res. Center
c/o Mohawk Nation Council of Chiefs
Via Box 366
Rooseveltown, NY 13683

Phone: (518) 358-4161
Fax: (518) 358-3488

From: Christopher Caraccilo
Cultural Resources Coordinator

Phone: (585) 272-4833
Fax: (585) 272-7547

We Are Sending You the Following:

- [ ] Preliminary Drawings
- [ ] Draft Letter/Memo
- [ ] Utility Information
- [ ] Final Prints
- [ ] Specifications/Estimates
- [ ] End of Field Letter
- [X] Copy of Letter/Memo

Copies	Dwg. No.	Date	Description
1		8/2009	**Cultural Resource Survey Report sent to Chief Leo R. Henry and Chief Stuart Patterson as well**
			Phase 1 Cultural Resource Survey-Norfolk Southern Railroad
			Bridge, Towns of Genesee Falls and Portageville
			Livingston & Wyoming Counties

These are Transmitted (as checked below):

- [X] For your use
- [ ] For approval
- [ ] For review and comment (Return by _____)
- [ ] Comments as noted (Correct and return by _____)
- [x] Call if you have any questions
- [ ] As requested
- [X] For your information
- [ ] Reply requested
- [ ] Call upon receipt

Additional Instructions/Remarks: I had an extra copy to send to you.

Copy To:
- [X] File
- [ ] _____
- [ ] _____

Signed: Chris Caraccilo

NEW YORK STATE
DEPEARTMENT OF TRANSPORTATION
REGION 4 DESIGN

1530 Jefferson Road
Rochester, New York 14623-3161

Ph. (585) 272-3360 Fax. (585) 272-7547

LETTER OF TRANSMITTAL

Sept. 22, 2010

Subject: Norfolk Southern Railroad-Portageville Bridge, Livingston & Wyoming Counties

To: G. Peter Jemison
NAGPRA Rep., SNI
Ganondagan Historic Site
Victor-Holcomb Rd.
PO Box 239
Victor, NY 14564

Phone: (585) 924-5848
Fax: (585) 924-5323

From: Chris Caraccilo
Cultural Resources Coordinator

Phone: (585-272-4833
Fax: (585) 272-7547

We Are Sending You the Following:

- [ ] Preliminary Drawings
- [ ] Draft Letter/Memo
- [ ] Utility Information
- [ ] Final Prints
- [ ] Specifications/Estimates
- [X] Cultural Resource Survey Report
- [ ] Copy of Letter/Memo

Copies	Dwg. No.	Date	Description
1		8/2009	**Cultural Resource Survey sent to Robert Dean**
			Phase 1 Cultural Resource Survey –Norfolk Southern Railroad Bridge
			Towns of Genesee Falls and Portageville
			Wyoming and Livingston Counties

These are Transmitted (as checked below):

- [X] For your use
- [ ] For approval
- [ ] For review and comment (Return by _____)
- [ ] Comments as noted (Correct and return by _____)
- [X] Call if you have any questions
- [ ] As requested
- [X] For your information
- [ ] Reply requested
- [ ] Call upon receipt

Additional Instructions/Remarks: I had an extra copy

Copy To:
- [X] File
- [ ] _____
- [ ] _____

Signed: Chris Caraccilo

NEW YORK STATE
DEPEARTMENT OF TRANSPORTATION
REGION 4 DESIGN

1530 Jefferson Road
Rochester, New York 14623-3161

Ph. (585) 272-3360 Fax. (585) 272-7547

LETTER OF TRANSMITTAL

Sept. 21, 2010

Subject: Norfolk/Southern Railroad-Portageville Bridge, Livingston & Wyoming Counties

To: Chief Leo Henry & Stuart Patterson
Tuscarora Nation
2006 Mt. Hope Road
via Leweston, NY 14092

Phone: (716) 662-7061
Fax: (716) 297-7355

From: Christopher Caraccilo
Cultural Resources Coordinator

Phone: (585) 272 -4833
Fax: (585) 272-7547

We Are Sending You the Following:

- [ ] Preliminary Drawings
- [ ] Draft Letter/Memo
- [ ] Utility Information
- [ ] Final Prints
- [ ] Specifications/Estimates
- [X] Cultural Resource Survey Report
- [ ] Copy of Letter/Memo

Copies	Dwg. No.	Date	Description
1		8/2009	Phase 1 Cultural Resource Survey Norfolk Southern Railroad
			Bridge Crossing, Towns of Genesee Falls and Portageville
			Wyoming and Livingston Counties

These are Transmitted (as checked below):

- [X] For your use
- [ ] For approval
- [ ] For review and comment (Return by _____)
- [ ] Comments as noted (Correct and return by _____)
- [X] Call if you have any questions
- [ ] As requested
- [X] For your information
- [ ] Reply requested
- [ ] Call upon receipt

Additional Instructions/Remarks: _____

Copy To:
- [X] File
- [ ] _____
- [ ] _____

Signed: Chris Caraccilo

NEW YORK STATE
DEPEARTMENT OF TRANSPORTATION
REGION 4 DESIGN

1530 Jefferson Road
Rochester, New York 14623-3161

Ph. (585) 272-3360 Fax. (585) 272-7547

LETTER OF TRANSMITTAL

Sept. 13, 2010

Subject: Norfolk/Southern Railroad-Portageville Bridge, Wyoming and Livingston Counties

To: Christine Abrams/Chief Darwin Hill
Tonawanda Seneca Nation Office
7027 Meadville Road
Basom, NY 14013

Phone: **(716) 542-4244**
Fax: **(716) 542-4244**

From: Chris Caraccilo
Cultural Resources Coordinator

Phone: 585-272-4833
Fax: (585) 272-7547

We Are Sending You the Following:

- [ ] Preliminary Drawings
- [ ] Draft Letter/Memo
- [ ] Utility Information
- [ ] Final Prints
- [ ] Specifications/Estimates
- [x] Cultural Resource Survey Report
- [ ] Other

Copies	Dwg. No.	Date	Description
1		8/2009	Phase 1 Cultural Resource Survey- Norfolk Southern Railroad
			Bridge Crossing, Towns of Genesee Falls and Portageville
			Wyoming and Livingston Counties.

These are Transmitted (as checked below):

- [x] For your use
- [ ] For approval
- [ ] For review and comment (Return by _____)
- [ ] Comments as noted (Correct and return by _____)
- [x] Call if you have any questions
- [ ] As requested
- [x] For your information
- [ ] Reply requested
- [ ] Call upon receipt

Additional Instructions/Remarks:

Copy To:
- [x] File
- [ ] _____
- [ ] _____

Signed: Chris Caraccilo

OFFICE OF PARKS · RECREATION · HISTORIC PRESERVATION
NEW YORK STATE

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
518-237-8643
www.nysparks.com

David A. Paterson
Governor

Carol Ash
Commissioner

September 24, 2010

Claudia Cooney
AKRF Inc.
440 Park Avenue South
7th Floor
New York, NY 10016
(via email only)

Re: FRA, DOT, PKS
Portageville Bridge Replacement
Town of Portage, Livingston County
Town of Genesee Falls, Wyoming County
08PR04896

Dear Ms. Cooney:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). The SHPO has reviewed the Phase I Cultural Resources Investigation Report, prepared by Hartgen Archeological Associates and dated August 2009, in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended.

Based upon this review, the SHPO requests the following information:

1. Please provide an updated project map that includes (1) areas of slope greater than 12-15% and areas of previous ground disturbance delineated and labeled; and (2) the Cascade House, Loci A, B and C site limits delineated

2. The Native American history of the Genesee River valley is rich. We would recommend that the Seneca Nation of Indians Tribal Historic Preservation Office (SNITHPO) is contacted regarding additional historic references. These references may help expand the existing precontact and historic overviews.

The SHPO concurs with the recommendation for avoidance or a Phase II Site Evaluation of the Cascade House Historic Site (A05113.000072). If avoidance is opted for, a short-term and long-term avoidance plan will be necessary. Avoidance suggestions are enclosed.

If Federal permits or monies are involved, Native American consultation is required under Section 106 of the National Historic Preservation Act of 1966 and its implementing regulations 36 CFR 800.

OFFICE OF PARKS · RECREATION · HISTORIC PRESERVATION
NEW YORK STATE

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
518-237-8643
www.nysparks.com

David A. Paterson
Governor

Carol Ash
Commissioner

Please telephone me at ext. 3280 with any questions you may have.

Sincerely,

Nancy Herter

Nancy Herter
Scientist, Archaeology

cc. Janet Zuckerman, OPRHP *(via email only)*
Julian Adams, OPRHP *(via email only)*
Robert Dean, SNI THPO *(via email only)*
Jare Cardinel, SNI *(via email only)*
Chief Roger Hill *(via email only)*
Andrew Krievs, Hartgen Archaeological Associates *(via email only)*

OFFICE OF PARKS · RECREATION · HISTORIC PRESERVATION
NEW YORK STATE

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
518-237-8643
www.nysparks.com

David A. Paterson
Governor

Carol Ash
Commissioner

Office of Parks, Recreation and Historic Preservation (OPRHP) Avoidance Plan for the Protection of Archeological Sites

Short Term Site Avoidance/Protection

- The site(s) boundary (including buffer) will be clearly delineated on the final construction plans and identified as a "Sensitive Area/No Access".
- Each site will be protected with temporary fencing during all construction activities and signage stating "Sensitive Area/No Access".
- A preconstruction meeting with the construction contractor(s) is required to notify those in charge of the requirements to avoid/protect the site(s).
- Existing landscape at the site(s) will be maintained. Any proposed modifications will require consultation with the OPRHP.

Long Term Site Avoidance/Protection

- An archeology covenant will be transferred with each property containing the avoided/protected site(s).
- State and federal regulations that include restrictions associated with this project will include provisions for site(s) avoidance/protection.
- Unauthorized activities within the site boundaries will require notification to the OPRHP at (518) 237-8643, ext 3280.

SENECA NATION OF INDIANS
TRIBAL HISTORIC PRESERVATION OFFICE
90 OHI:YO' WAY
SALAMANCA, NY 14779
PHONE: (716) 945-1790 FAX: (716) 945-8133

February 24, 2011

Chris Caraccilo
New York State Department of Transportation – Region 4 Design
1530 Jefferson Road
Rochester, NY 14623

Re: Cascade Hotel Norfolk Southern Railroad Bridge Project
Town of Portage, Livingston County, NY

Dear Mr. Caraccilo,

Thank you for providing the information for the above referenced project. In accordance with Section 106 of the National Historic Preservation Act (36 CFR § 800), the SNI Tribal Historic Preservation Office has a finding of "No Adverse Effect" on historical properties eligible for or included in the National Register of Historic Places. We concur with the recommendations of the End of Field Work Letter, Phase II Archaeological Investigation by Hertgen Archeological Associates, Inc. that no further excavation is necessary for the Area of Potential Effect.

We have no further issues if the proposed plan is followed. If your scope of work for the project site changes at any time, please notify our office as soon as possible. Thank you.

Sincerely,

Lauren Waldinger
Tribal Archaeologist
Lauren.Waldinger@sni.org

THPO Ref. 11-3592

NEW YORK STATE
DEPEARTMENT OF TRANSPORTATION
REGION 4 DESIGN

1530 Jefferson Road
Rochester, New York 14623-3161

Ph. (585) 272-3360 Fax. (585) 272-7547

LETTER OF TRANSMITTAL

May 9, 2011

THPO # 11-3592

Subject: Portageville Bridge ReplacementProject
Town of Genesee Falls, Wyoming County, Town of Portage, Livingston County

To: Ms. Lana Watt
Seneca Nation THPO
90 O:hi'yoh Way
Salamanca, NY 14779

Phone: (716) 945-1790 x3589
Fax:

From: Chris Caraccilo
Cultural Resources Coordinator

Phone: (585)-272-4833
Fax: (585) 272-7547

We Are Sending You the Following:

- [ ] Preliminary Drawings
- [ ] Draft Letter/Memo
- [ ] Utility Information
- [ ] Final Prints
- [ ] Specifications/Estimates
- [x] Cultural Resources Survey Report
- [ ] Copy of Letter/Memo

Copies	Dwg. No.	Date	Description
1		5/3/ 2011	Phase II Archaeological Investigation Report
			Portageville Bridge Replacement Project

These are Transmitted (as checked below):

- [x] For your use
- [ ] For approval
- [ ] For review and comment (Return by _____)
- [ ] Comments as noted (Correct and return by _____)
- [x] Call if you have any questions
- [ ] As requested
- [x] For your information
- [ ] Reply requested
- [ ] Call upon receipt

Additional Instructions/Remarks:

Copy To:
- [x] G. Peter Jemison
- [x] File
- [ ] _____

Signed: Chris Caraccilo

NEW YORK STATE
DEPEARTMENT OF TRANSPORTATION
REGION 4 DESIGN

1530 Jefferson Road
Rochester, New York 14623-3161

Ph. (585) 272-3360 Fax. (585) 272-7547

LETTER OF TRANSMITTAL

May 9, 2011

Subject: Portageville Bridge ReplacementProject
Town of Genesee Falls, Wyoming County, Town of Portage, Livingston County

To: Christine Abrams/Chief Darwin Hill
Tonawanda Seneca Nation Office
7027 Meadville Road
Basom, NY 14013

Phone: (716) 542-4244
Fax: (716) 542-4244

From: Chris Caraccilo
Cultural Resources Coordinator

Phone: 585-272-4833
Fax: (585) 272-7547

We Are Sending You the Following:

- [ ] Preliminary Drawings
- [ ] Draft Letter/Memo
- [ ] Utility Information
- [ ] Final Prints
- [ ] Specifications/Estimates
- [X] Cultural Resource Survey Report
- [ ] Other

Copies	Dwg. No.	Date	Description
1		5/3/11	**Phase II** Archaeological Investigation Report
			Portageville **Bridge** Replacement Project

These are Transmitted (as checked below):

- [X] For your use
- [ ] For approval
- [ ] For review and comment (Return by _____)
- [ ] Comments as noted (Correct and return by _____)
- [X] Call if you have any questions
- [ ] As requested
- [X] For your information
- [ ] Reply requested
- [ ] Call upon receipt

Additional Instructions/Remarks:

Copy To:
- [X] File
- [ ] _____
- [ ] _____

Signed: Chris Caraccilo

OFFICE OF PARKS · RECREATION · HISTORIC PRESERVATION
NEW YORK STATE

Andrew M. Cuomo
Governor

Rose Harvey
Commissioner

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
518-237-8643
www.nysparks.com

May 23, 2011

Christopher Caraccilo
NYS DOT Region 4
1530 Jefferson Road
Rochester, NY 14623
(via email only)

Re: FRA, DOT, PKS
Portageville Bridge Replacement
Town of Portage, Livingston County
Town of Genesee Falls, Wyoming County
08PR04896

Dear Mr. Caraccilo:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). The SHPO has reviewed the Phase II Archaeological Investigation Report for the Cascade House Precontact and Historic Site (A05113.000072), prepared by Hartgen Archeological Associates and dated April 2011, in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended.

Based upon this review, the SHPO concurs that the research potential of the Cascade House Site has been exhausted and has no further archaeology concerns with this undertaking.

Please telephone me at ext. 3280 with any questions you may have.

Sincerely,

Nancy Herter

Nancy Herter
Scientist, Archaeology

cc. Janet Zuckerman, OPRHP *(via email only)*
Julian Adams, OPRHP *(via email only)*
Lana Watt, SNI THPO *(via email only)*
Andrew Krievs, Hartgen Archaeological Associates *(via email only)*

NEW YORK STATE
DEPARTMENT OF TRANSPORTATION
REGION 4 DESIGN

1530 Jefferson Road
Rochester, New York 14623-3161

Ph. (585) 272-3360 Fax. (585) 272-7547

LETTER OF TRANSMITTAL

August 8, 2012

THPO # 11-3592

Subject: Portageville Bridge ReplacementProject
Town of Genesee Falls, Wyoming County, Town of Portage, Livingston County

To: Ms. Lana Watt
Seneca Nation THPO
90 O:hi'yoh Way
Salamanca, NY 14779

Phone: (716) 945-1790 x3589
Fax:

From: Chris Caraccilo
Cultural Resources Coordinator

Phone: (585)-272-4833
Fax: (585) 272-7547

We Are Sending You the Following:

- [ ] Preliminary Drawings
- [ ] Draft Letter/Memo
- [ ] Utility Information
- [ ] Final Prints
- [ ] Specifications/Estimates
- [X] Cultural Resources Survey Report
- [ ] Copy of Letter/Memo

Copies	Dwg. No.	Date	Description
1		6/20/12	Phase IB Archaeological Investigation Report
			Portageville Bridge Replacement Project
1		7/23/12	Cascade House Historic Site Avoidance Plan

These are Transmitted (as checked below):

- [X] For your use
- [ ] For approval
- [ ] For review and comment (Return by _____)
- [ ] Comments as noted (Correct and return by _____)
- [X] Call if you have any questions
- [ ] As requested
- [X] For your information
- [ ] Reply requested
- [ ] Call upon receipt

Additional Instructions/Remarks:

Copy To:
- [X] G. Peter Jemison
- [X] File
- [ ] _____

Signed: Chris Caraccilo

NEW YORK STATE
DEPEARTMENT OF TRANSPORTATION
REGION 4 DESIGN

1530 Jefferson Road
Rochester, New York 14623-3161

Ph. (585) 272-3360 Fax: (585) 272-7547

LETTER OF TRANSMITTAL

August 22, 2012

Subject: Portageville Bridge ReplacementProject
Town of Genesee Falls, Wyoming County, Town of Portage, Livingston County

To: Christine Abrams/Chief Darwin Hill
Tonawanda Seneca Nation Office
7027 Meadville Road
Basom, NY 14013

Phone: **(716) 542-4244**
Fax: **(716) 542-4244**

From: Chris Caraccilo
Cultural Resources Coordinator

Phone: 585-272-4833
Fax: (585) 272-7547

We Are Sending You the Following:

- [ ] Preliminary Drawings
- [ ] Draft Letter/Memo
- [ ] Utility Information
- [ ] Final Prints
- [ ] Specifications/Estimates
- [X] Cultural Resource Survey Report
- [ ] Other

Copies	Dwg. No.	Date	Description
1		6/20/12	Phase IB Archaeological Investigation **Report**
			Portageville Bridge Replacement **Project**
1		7/23/12	Cascade House Historic Site Avoidance Plan

These are Transmitted (as checked below):

- [X] For your use
- [ ] For approval
- [ ] For review and comment (Return by _____)
- [ ] Comments as noted (Correct and return by _____)
- [X] Call if you have any questions
- [ ] As requested
- [X] For your information
- [ ] Reply requested
- [ ] Call upon receipt

Additional Instructions/Remarks:

Copy To:
- [X] File
- [ ] _____
- [ ] _____

Signed: Chris Caraccilo

Andrew M. Cuomo
Governor

Rose Harvey
Commissioner

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
518-237-8643
www.nysparks.com

September 4, 2012

Mr. Christopher P. Caraccilo
NYS DOT Region 4
1530 Jefferson Road
Rochester, New York 14623-3161

RE: DOT (**PIN 4935.79.301**)
Portageville Bridge Replacement Project: Addendum Phase 1B Archaeological Investigation Report & Avoidance Plan for the Cascade House Historic Site, Town of Portage, Livingston County; Town of Genesee Falls, Wyoming County
08PR04896

Dear Mr. Caraccilo:

Thank you for requesting the comments of the Office of the State Historic Preservation Officer (SHPO). We have reviewed the submitted report *Portageville Bridge Replacement Project: Addendum Phase 1B Archaeological Investigation Report & Avoidance Plan for the Cascade House Historic Site, Town of Portage, Livingston County; Town of Genesee Falls, Wyoming County* completed by Hartgen Archaeological Associates, Inc. and received by our office August 10, 2012. 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).

Results of the Phase 1B archaeological investigations indicate that a total of 36 shovel test pits were excavated within the project impact area. Two precontact lithic flakes were identified. Based upon the contexts from which they were recovered, it is likely that these flakes were found in disturbed contexts, and therefore not indicative of National Register-eligible properties. Additional impacts to the western side of the railroad easement will occur primarily in areas of prior disturbance and on slopes greater than 15% grade. Three shovel tests were excavated in this area. No cultural materials were recovered. No further archaeological investigation was recommended.

Based upon the provided information, our office concurs with the submitted findings for the proposed project. Furthermore, we concur with the proposed *Avoidance Plan for the Cascade House Historic Site* as provided by the Northfolk Southern Corporation. Should you have any questions, please feel free to contact me directly at (518) 237-8643, Extension 3288 or via electronic mail at Brian.Yates@parks.ny.us. If further correspondence is required regarding this project, please be sure to refer to the OPRHP Project Review (PR) number noted above.

Sincerely,

Wm. Brian Yates
Historic Preservation Specialist

cc: Joseph Krupitza, NYSDOT Freight & Passenger Rail Bureau (*email only*)
Mary Santangelo, NYSDOT Office of the Environment, Albany (*email only*)

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Mr. Nathan Holth
Webmaster, HistoricBridges.org
5371 Walker Road
North Street, MI 48049

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Mr. Holth:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Ms. Sally Walker
Executive Director
Genesee Valley Conservancy
1 Main Street
Geneseo, NY 14454

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Ms. Walker:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013.**

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Ms. Tania Werbizky
Regional Director, Technical and Grant Programs
Preservation League of New York State
202 The Commons, Suite 302
Ithaca, NY 14850

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Ms. Werbizky:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Mr. Ronald Ballinger, President
Castile Historical Society & Museum
17 Park Road East
Castile, NY 14427

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Mr. Ballinger:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Ms. Doris A. Bannister, Historian
Wyoming County Historical Office
26 Linwood Avenue
Warsaw, NY 14569

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Ms. Bannister:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Mr. Thomas Yots
Director, Preservation Buffalo Niagara
Suite M108, 617 Main Street
Buffalo, NY 14203

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Mr. Yots:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Mr. Joseph Koscis
Western New York Railway Historical Society
201 Siegfried Drive
Amherst, NY 14222-4457

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Mr. Koscis:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Mr. William Brummett
President
Livingston County Historical Society
30 Center Street
Geneseo, NY 14454

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Mr. Brummett:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Mr. Edward Holmes, President
Friends of the Genesee Valley Greenway
PO Box 42
Mt. Morris, NY 14510

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Mr. Holmes:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Ms. Joanne Arany
Executive Director
Landmark Society of Western New York
133 South Fitzhugh Street
Rochester, NY 14608-2204

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Ms. Arany:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Ms. Carol Rathbun, President
Friends of Letchworth
1 Letchworth State Park
Castile, NY 14427

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Ms. Rathbun:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

U.S. Department of Transportation
Federal Highway Administration

New York Division

Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207
518-431-4127
Fax: 518-431-4121
New York.FHWA@dot.gov

November 14, 2013

In Reply Refer To:
HDO-NY

Mr. Jamie Fosburgh
U.S. Department of Interior
National Park Service
15 State Street
Boston, MA 02109

Subject: PIN 4935.79 – Invitation to become a Section 106 Consulting Party
Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County

Dear Mr. Fosburgh:

A Draft Environmental Impact Statement (Draft EIS) was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013 with a public hearing held in January 2013. However, after receiving federal funding from the Federal Highway Administration's (FHWA's) Congestion Mitigation and Air Quality Improvement (CMAQ) Program, the environmental review process is being adjusted to also satisfy federal review requirements. As such, a new Draft EIS will be published in accordance with the National Environmental Policy Act (NEPA) and the project will undergo review pursuant to Section 106 of the NHPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments. The new Draft EIS will address comments received during previous agency and public review, as appropriate.

Given your status as a consulting party under SEQR, this letter invites you to participate as a consulting party for review of the Portageville Bridge Project pursuant to Section 106 of the National Historic Preservation Act (NHPA; 36 CFR § 800).

The Portageville Bridge—spanning the Genesee River in Letchworth State Park between Wyoming County and Livingston County in Western New York—currently serves freight rail operated by Norfolk Southern Railway Company (Norfolk Southern) and is a vital, yet deficient, component of the Southern Tier route. The bridge was constructed in 1875 and is nearing the end of its useful life as a freight rail structure. Due to structural deficiencies, Norfolk Southern must impose substantial tonnage and speed restrictions on the bridge. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

As the federal lead agency, FHWA published a Notice of Intent to prepare an EIS for the Portageville Bridge Project in the *Federal Register*. As described in the Notice of Intent, FHWA, along with the New York State Department of Transportation (NYSDOT), acting as the New York State lead agency, are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. The Portageville Bridge EIS will serve as the basis for FHWA's Record of Decision under NEPA (NEPA; 42 USC §4321 et seq.) and

will also comply with requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and other applicable federal laws, rules, and regulations.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

For additional information, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a consulting party, please contact Michael Kowalczyk at 518-431-8892 or Michael.Kowalczyk@dot.gov by **December 19, 2013**. If you have any questions or would like to request any further information, please feel free to contact Mike.

Sincerely,

Robert M. Davies
District Engineer

cc: R. Hessinger, Director, Freight & Passenger Rail Bureau, NYSDOT

U.S. Department of Transportation
Federal Highway Administration

New York Division

Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207
518-431-4127
Fax: 518-431-4121
New York.FHWA@dot.gov

November 14, 2013

In Reply Refer To:
HDO-NY

Ms. Lauren Waldinger
Seneca Nation of Indians
90 Ohi:yo' Way
Salamanca, NY 14779

Subject: PIN 4935.79 – Invitation to become a Section 106 Consulting Party
Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County

Dear Ms. Waldinger:

A Draft Environmental Impact Statement (Draft EIS) was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013 with a public hearing held in January 2013. However, after receiving federal funding from the Federal Highway Administration's (FHWA's) Congestion Mitigation and Air Quality Improvement (CMAQ) Program, the environmental review process is being adjusted to also satisfy federal review requirements. As such, a new Draft EIS will be published in accordance with the National Environmental Policy Act (NEPA) and the project will undergo review pursuant to Section 106 of the NHPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments. The new Draft EIS will address comments received during previous agency and public review, as appropriate.

Given your status as a consulting party under SEQR, this letter invites you to participate as a consulting party for review of the Portageville Bridge Project pursuant to Section 106 of the National Historic Preservation Act (NHPA; 36 CFR § 800).

The Portageville Bridge—spanning the Genesee River in Letchworth State Park between Wyoming County and Livingston County in Western New York—currently serves freight rail operated by Norfolk Southern Railway Company (Norfolk Southern) and is a vital, yet deficient, component of the Southern Tier route. The bridge was constructed in 1875 and is nearing the end of its useful life as a freight rail structure. Due to structural deficiencies, Norfolk Southern must impose substantial tonnage and speed restrictions on the bridge. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

As the federal lead agency, FHWA published a Notice of Intent to prepare an EIS for the Portageville Bridge Project in the *Federal Register*. As described in the Notice of Intent, FHWA, along with the New York State Department of Transportation (NYSDOT), acting as the New York State lead agency, are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. The Portageville Bridge EIS will serve as the basis for FHWA's Record of Decision under NEPA (NEPA; 42 USC §4321 et seq.) and

will also comply with requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and other applicable federal laws, rules, and regulations.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

For additional information, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a consulting party, please contact Michael Kowalczyk at 518-431-8892 or Michael.Kowalczyk@dot.gov by **December 19, 2013**. If you have any questions or would like to request any further information, please feel free to contact Mike.

Sincerely,

Robert M. Davies
District Engineer

cc: R. Hessinger, Director, Freight & Passenger Rail Bureau, NYSDOT

U.S. Department of Transportation
Federal Highway Administration

New York Division

Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207
518-431-4127
Fax: 518-431-4121
New York.FHWA@dot.gov

November 14, 2013

In Reply Refer To:
HDO-NY

Mr. Darwin Hill
Tonawanda Seneca Nation
7027 Meadville Road
Basom, NY 14013

Subject: PIN 4935.79 – Invitation to become a Section 106 Consulting Party
Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County

Dear Mr. Hill:

A Draft Environmental Impact Statement (Draft EIS) was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013 with a public hearing held in January 2013. However, after receiving federal funding from the Federal Highway Administration's (FHWA's) Congestion Mitigation and Air Quality Improvement (CMAQ) Program, the environmental review process is being adjusted to also satisfy federal review requirements. As such, a new Draft EIS will be published in accordance with the National Environmental Policy Act (NEPA) and the project will undergo review pursuant to Section 106 of the NHPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments. The new Draft EIS will address comments received during previous agency and public review, as appropriate.

Given your status as a consulting party under SEQR, this letter invites you to participate as a consulting party for review of the Portageville Bridge Project pursuant to Section 106 of the National Historic Preservation Act (NHPA; 36 CFR § 800).

The Portageville Bridge—spanning the Genesee River in Letchworth State Park between Wyoming County and Livingston County in Western New York—currently serves freight rail operated by Norfolk Southern Railway Company (Norfolk Southern) and is a vital, yet deficient, component of the Southern Tier route. The bridge was constructed in 1875 and is nearing the end of its useful life as a freight rail structure. Due to structural deficiencies, Norfolk Southern must impose substantial tonnage and speed restrictions on the bridge. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

As the federal lead agency, FHWA published a Notice of Intent to prepare an EIS for the Portageville Bridge Project in the *Federal Register*. As described in the Notice of Intent, FHWA, along with the New York State Department of Transportation (NYSDOT), acting as the New York State lead agency, are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. The Portageville Bridge EIS will serve as the basis for FHWA's Record of Decision under NEPA (NEPA; 42 USC §4321 et seq.) and

will also comply with requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and other applicable federal laws, rules, and regulations.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

For additional information, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a consulting party, please contact Michael Kowalczyk at 518-431-8892 or Michael.Kowalczyk@dot.gov by **December 19, 2013**. If you have any questions or would like to request any further information, please feel free to contact Mike.

Sincerely,

Robert M. Davies
District Engineer

cc: R. Hessinger, Director, Freight & Passenger Rail Bureau, NYSDOT

U.S. Department of Transportation
Federal Highway Administration

New York Division

Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207
518-431-4127
Fax: 518-431-4121
New York.FHWA@dot.gov

November 14, 2013

In Reply Refer To:
HDO-NY

Mr. Neil Patterson, Jr.
Tuscarora Nation
1967 Upper Mountain Road
Lewiston, NY 14092

Subject: PIN 4935.79 – Invitation to become a Section 106 Consulting Party
Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County

Dear Mr. Patterson:

A Draft Environmental Impact Statement (Draft EIS) was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013 with a public hearing held in January 2013. However, after receiving federal funding from the Federal Highway Administration's (FHWA's) Congestion Mitigation and Air Quality Improvement (CMAQ) Program, the environmental review process is being adjusted to also satisfy federal review requirements. As such, a new Draft EIS will be published in accordance with the National Environmental Policy Act (NEPA) and the project will undergo review pursuant to Section 106 of the NHPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments. The new Draft EIS will address comments received during previous agency and public review, as appropriate.

Given your status as a consulting party under SEQR, this letter invites you to participate as a consulting party for review of the Portageville Bridge Project pursuant to Section 106 of the National Historic Preservation Act (NHPA; 36 CFR § 800).

The Portageville Bridge—spanning the Genesee River in Letchworth State Park between Wyoming County and Livingston County in Western New York—currently serves freight rail operated by Norfolk Southern Railway Company (Norfolk Southern) and is a vital, yet deficient, component of the Southern Tier route. The bridge was constructed in 1875 and is nearing the end of its useful life as a freight rail structure. Due to structural deficiencies, Norfolk Southern must impose substantial tonnage and speed restrictions on the bridge. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

As the federal lead agency, FHWA published a Notice of Intent to prepare an EIS for the Portageville Bridge Project in the *Federal Register*. As described in the Notice of Intent, FHWA, along with the New York State Department of Transportation (NYSDOT), acting as the New York State lead agency, are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. The Portageville Bridge EIS will serve as the basis for FHWA's Record of Decision under NEPA (NEPA; 42 USC §4321 et seq.) and

will also comply with requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and other applicable federal laws, rules, and regulations.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

For additional information, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a consulting party, please contact Michael Kowalczyk at 518-431-8892 or Michael.Kowalczyk@dot.gov by **December 19, 2013**. If you have any questions or would like to request any further information, please feel free to contact Mike.

Sincerely,

Robert M. Davies
District Engineer

cc: R. Hessinger, Director, Freight & Passenger Rail Bureau, NYSDOT

U.S. Department of Transportation
Federal Highway Administration

New York Division

Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207
518-431-4127
Fax: 518-431-4121
New York.FHWA@dot.gov

November 18, 2013

In Reply Refer To:

Chief Leo R. Henry
Tuscarora Nation
2006 Mt. Hope Road
Via Lewiston, NY 14092

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County,
Section 106 Consultation

Dear Chief Henry:

The Federal Highway Administration (FHWA), in coordination with the New York State Department of Transportation (NYSDOT), would like to initiate consultation with the Tuscarora Nation for the proposed *Portageville Bridge Project* (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

Enclosed for your information, please find a map showing the project location in Letchworth State Park, Wyoming and Livingston Counties, New York, a location within the geographical area of interest of the Tuscarora Nation for the purpose of Section 106 consultation.
The Portageville Bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January

2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

We invite you to meet with FHWA and NYSDOT representatives to discuss and consider your views about the project and its potential to affect properties of religious and cultural significance to the Tuscarora Nation. NYSDOT staff will contact you shortly to confirm a date and time, based on your availability.

On behalf of FHWA and NYSDOT, we look forward to your participation in Section 106 consultation for the Portageville Bridge project. If you have any questions, please feel free to contact Mr. Michael Kowalczyk, FHWA Area Engineer, at 518-431-8892.

Sincerely,

Robert M. Davies
District Engineer

Enclosure: Project Location Map

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Raymond Hessinger, P.E., NYSDOT Main Office
Daniel P. Hitt, NYSDOT Main Office

U.S. Department of Transportation
Federal Highway Administration

New York Division

Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207
518-431-4127
Fax: 518-431-4121
New York.FHWA@dot.gov

November 18, 2013

In Reply Refer To:

Ms. Melissa Bach
Tribal Historic Preservation Officer (THPO)
Seneca Nation of Indians
90 O:hi'yoh Way
Salamanca, NY 14779

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Section 106 Consultation

Dear Ms. Bach:

The Federal Highway Administration (FHWA), in coordination with the New York State Department of Transportation (NYSDOT), would like to initiate consultation with the Seneca Nation of Indians for the proposed *Portageville Bridge Project* (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

Enclosed for your information, please find a map showing the project location in Letchworth State Park, Wyoming and Livingston Counties, New York, a location within the geographical area of interest of the Seneca Nation for the purpose of Section 106 consultation.
The Portageville Bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency

review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

We invite you to meet with FHWA and NYSDOT representatives to discuss and consider your views about the project and its potential to affect properties of religious and cultural significance to the Seneca Nation. NYSDOT staff will contact you shortly to confirm a date and time, based on your availability.

On behalf of FHWA and NYSDOT, we look forward to your participation in Section 106 consultation for the Portageville Bridge project. If you have any questions, please feel free to contact Mr. Michael Kowalczyk, FHWA Area Engineer, at 518-431-8892.

Sincerely,

Robert M. Davies
District Engineer

Enclosure: Project Location Map

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Raymond Hessinger, P.E., NYSDOT Main Office
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
REGION FOUR
1530 JEFFERSON ROAD
ROCHESTER, NEW YORK 14623-3161
www.dot.ny.gov

ROBERT A. TRAVER, P.E.
ACTING REGIONAL DIRECTOR

JOAN MCDONALD
COMMISSIONER

January 7, 2014

Michael S. Kowalczyk, P.E.
Area Engineer-Region 6
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Ave, Suite 719
Albany, NY 12207

RE: Portageville Bridge Project
PIN 4935.79.101 / 08PR04896
Towns of Portage and Genesee Falls, Livingston and Wyoming County
REQUEST FOR APPROVAL OF SECTION 106 CONSULTING PARTY STATUS

Dear Mr. Kowalczyk:

Please find enclosed for consideration by the Federal Highway Administration (FHWA), requests for Section 106 Consulting Party status for the *Portageville Bridge Project*, submitted to the New York State Department of Transportation (NYSDOT) in accordance with 36 CFR Part 800.2(c)(5):

> *Certain individuals and organizations with a demonstrated interest in the undertaking may Participate as consulting parties due to the nature of their legal or economic relation to the Undertaking or affected properties, or their concern with the undertaking's effect on historic properties.*

On November 15, 2013, NYSDOT reached out to selected individuals and organizations, inviting them to apply for Consulting Party status based on a Regional interest in historic preservation or a previous expression of interest in the Project. In addition, a Public Scoping meeting held in Mt. Morris, New York on November 19, 2013, informed the public of the opportunity to participate in the Section 106 consultation process. The enclosures received in response to these efforts include copies of all written requests received by NYSDOT as formal letters, forms, or e-mails as well as a comprehensive list prepared by NYSDOT in a table format for your convenience.

The New York State Department of Transportation (NYSDOT) has reviewed the enclosed requests and recommends the following individuals and organizations for Consulting Party status, based on their written statements of interest. We also recommend treating the NYS Parks Office as a Consulting Party due to its jurisdiction over Letchworth State Park, a National Register listed property subject to consideration through the Section 106 review process.

1. Landmark Society of Western New York
2. Friends of the Genesee Valley Greenway
3. Historic Bridges.org
4. Seneca Nation of Indians
5. Tonawanda Seneca Nation
6. Tuscarora Nation
7. NYS Office of Parks, Recreation and Historic Preservation-State Parks

The Seneca Nation of Indians, the Tonawanda Seneca Nation and the Tuscarora Nation have been identified as having a consultative role in accordance with 36 CFR Part 800.2(c)(ii), since all three have previously identified a geographical area of interest for Section 106 consultation that includes Livingston and Wyoming Counties.

We respectfully request FHWA approval of the above-referenced organizations, granting Consulting Party status for participation in the Section 06 process.

If you have any questions, please free to contact me at: Christopher.caraccilo@dot.ny.gov.

Sincerely,

Christopher Caraccilo
Cultural Resource Coordinator
NYSDOT Region 4

Enclosures

Cc: Robert Davies, FHWA
Julian Adams, OPRHP/SHPO
Ray Hessinger, NYSDOT
Dan Hitt, NYSDOT
Mary Santangelo, NYDOT
Chris Calvert, AKRF
file

LIST OF CONSULTING PARTY REQUESTS

NAME	ADDRESS	PHONE/EMAIL	RECOMMENDED	REQUEST
Landmark Society of Western New York Ms. Caitlin Meives, Preservation planner	133 S. Fitzhugh Street Rochester, NY 14608	Phone: (585)-546-7029 ext. 27 Fax: (585)-546-4788 cmeives@landmarksociety.org	Yes	Form 11/26/13
Friends of the Genesee Valley Greenway Edward Holmes Joan Schumaker	Box 42 Mt. Morris, NY 14510	Phone:(585)-658-2569 fogvg@frontiernet.net	Yes	Form 12/11/13
HistoricBridges.Org Nathan Holth	12534 Houghton Drive DeWitt, MI 48820	Phone: (269)-290-2593 nathan@historicbridges.org	Yes	Form 12/11/13
Seneca Nation of Indians Melissa Bach Tribal Historic Preservation Officer (THPO) Jay Toth, Tribal Archaeologist	90 O:hi'yoh Way Salamanca, NY 14779	Phone: (716) 945-1790, ext. 3580 Emergency: (716) 244-1735 Melissa.bach@sni.org Jay.toth@sni.org	Yes	Email 11/21/13
Tonawanda Seneca Nation Chief Darwin Hill	Tonawanda Seneca Nation Office 7027 Meadville Road Basom, New York 14013	Phone: (716)-542-4244 Fax:(716)- 542-4008 tonseneca@aol.com	Yes	---
Tuscarora Nation Chief Leo R. Henry	2006 Mt. Hope Road Via Lewiston, NY 14092	Phone:(716)-622-7061 Fax: (716)-297-7355	Yes	---
NYS Office of Park, Recreation and Historic Preservation-State Parks Dave Herring, Capital Facilities Manager	One Letchworth State Park Castile, NY 14427	Phone 585-493-3602 Mobile 585-322-5671 Fax 585-493-5272 David.herring@parks.ny.gov	Yes	---

U.S. Department of Transportation
Federal Highway Administration

New York Division

Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207
518-431-4127
Fax: 518-431-4121
New York.FHWA@dot.gov

January 17, 2014

In Reply Refer To:
HED-NY

Christopher Caraccilo
Regional Cultural Resource Coordinator
New York State Department of Transportation, Region 4
1530 Jefferson Road
Rochester, NY 14623

Subject: PIN 4935.79 – Portageville Bridge Project
Approval of Section 106 Consulting Party Status
Towns of Portage and Genesee Falls, Livingston and Wyoming County

Dear Mr. Caraccilo:

We have reviewed your January 7 letter transmitting 7 requests for Section 106 consulting party status on the Portageville Bridge Project. As stated in 36 CFR Part 800.2(c)(5):

Certain individuals and organizations with a demonstrated interest in the undertaking may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties.

After reviewing the information contained in the individual requests and the additional information provided, we have approved the following organizations and individuals to be consulting parties to the Section 106 process for the subject project:

1. Ms. Caitlin Meives – Landmark Society of Western New York
2. Mr. Edward Holmes – Friends of the Genesee Valley Greenway
3. Mr. Nathan Holth – HistoricBridges.org
4. Mr. Dave Herring – NYS Office of Parks, Recreation, and Historic Preservation – State Parks
5. Ms. Melissa Bach – Seneca Nation of Indians
6. Chief Darwin Hill – Tonawanda Seneca Nation
7. Chief Leo R. Henry – Tuscarora Nation

Consulting party status entitles these individuals/organizations to share views, receive and review pertinent information, offer ideas, and consider possible solutions together with the Federal Highway Administration, NYSDOT, and other consulting parties. Please ensure the requestors have a copy of the Advisory Council on Historic Preservation's (ACHP) guide entitled "Protecting Historic Properties: A Citizen's Guide to Section 106 Review".

If you have any questions, please contact me at (518) 431-8892.

Sincerely,

Michael S. Kowalczyk
Area Engineer

cc:
Julian Adams, OPRHP/SHPO
Carol Legard, ACHP
Ray Hessinger, NYSDOT MO
Dan Hitt, NYSDOT MO
Mary Santangelo, NYSDOT MO

Claudia Cooney <ccooney@akrf.com>

Portageville Bridge project

1 message

Caraccilo, Christopher P (DOT) <Christopher.Caraccilo@dot.ny.gov> Thu, Feb 13, 2014 at 9:03 AM
To: "bprintup@hetf.org" <bprintup@hetf.org>
Cc: "michael.kowalczyk@dot.gov" <michael.kowalczyk@dot.gov>, "robert.davies@dot.gov" <robert.davies@dot.gov>, "Hessinger, Raymond (DOT)" <Raymond.Hessinger@dot.ny.gov>, "Santangelo, Mary (DOT)" <Mary.Santangelo@dot.ny.gov>, Claudia Cooney <ccooney@akrf.com>, Julie Cowing <jcowing@akrf.com>

Dear Mr. Printup,

The Federal Highway Administration, NYS Department of Transportation and Norfolk Southern Railway Company are currently undertaking a project to replace the Portageville Rail Bridge (Portageville Bridge) in Letchworth State Park.

We have been informed by FHWA of the point-of-contact change for the Tuscarora Nation. Attached for your reference is the Section 106 project initiation letter that was sent to Chief Leo Henry on November 18, 2013.

NYSDOT staff are currently completing Section 106 documentation and anticipate a consulting party meeting in March.

On behalf of FHWA and NYS DOT we look forward to your participation in Section 106 consultation for the Portageville Bridge Project.

Please email or call with any questions.

Thank you,

Chris

Christopher P. Caraccilo

Acting Regional Landscape Architect

Regional Cultural Resource Coordinator

NYS Department of Transportation-Region 4

1530 Jefferson Road

Rochester, NY 14623

585-272-4833

11.18.2013_ltr_FHWA_Tuscarora.pdf
999K

U.S. Department of Transportation
Federal Highway Administration

New York Division

Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207
518-431-4127
Fax: 518-431-4121
New York.FHWA@dot.gov

November 18, 2013

In Reply Refer To:

Chief Leo R. Henry
Tuscarora Nation
2006 Mt. Hope Road
Via Lewiston, NY 14092

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County,
Section 106 Consultation

Dear Chief Henry:

The Federal Highway Administration (FHWA), in coordination with the New York State Department of Transportation (NYSDOT), would like to initiate consultation with the Tuscarora Nation for the proposed *Portageville Bridge Project* (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

Enclosed for your information, please find a map showing the project location in Letchworth State Park, Wyoming and Livingston Counties, New York, a location within the geographical area of interest of the Tuscarora Nation for the purpose of Section 106 consultation.
The Portageville Bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January

2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

We invite you to meet with FHWA and NYSDOT representatives to discuss and consider your views about the project and its potential to affect properties of religious and cultural significance to the Tuscarora Nation. NYSDOT staff will contact you shortly to confirm a date and time, based on your availability.

On behalf of FHWA and NYSDOT, we look forward to your participation in Section 106 consultation for the Portageville Bridge project. If you have any questions, please feel free to contact Mr. Michael Kowalczyk, FHWA Area Engineer, at 518-431-8892.

Sincerely,

Robert M. Davies
District Engineer

Enclosure: Project Location Map

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Raymond Hessinger, P.E., NYSDOT Main Office
Daniel P. Hitt, NYSDOT Main Office

Appendix C: Historic and Cultural Resources

C-3 Section 106 Consulting Parties Meeting

Portageville Bridge Project
New York State Department of Transportation
50 Wolf Road
Albany, New York 12232
Telephone: (518) 457-8075

Portageville Bridge Project
Section 106 Consulting Parties Meeting
Thursday, March 20, 2014
1:00PM-3:00PM
New York State Department of Transportation (NYSDOT) Region 4 Building
Genesee Conference Room, Third Floor. 1530 Jefferson Road, Rochester, New York

Purpose

The purpose of this meeting is to seek and consider the views of Consulting Party members pursuant to Section 106 of the National Historic Preservation Act regarding the Project's effects on identified historic and cultural resources, and to consider input on possible measures to avoid, minimize, or mitigate adverse effects.

Agenda

1:00pm-1:15pm

A. Introductions & Purpose of the Meeting – Raymond Hessinger, NYSDOT and Michael Kowalczyk, FHWA

1:15pm-1:25pm

B. Section 106 Process – Overview & Presentation – Mary Santangelo, NYSDOT

1:25pm-1:35pm

B. Project Overview & Presentation – Julie Cowing, AKRF

1:35pm-1:45pm

D. Effects on Historic Properties – Presentation –Claudia Cooney, AKRF

(1:45pm-1:50pm – Short Break)

1:50pm- 2:50pm

E. Roundtable Discussion – Resolution of Adverse Effects – NYSDOT and Claudia Cooney, AKRF

2:50pm-3:00pm

F. Wrap-Up: Consulting Party Review & Comment Period & Next Steps – Ray Hessinger, NYSDOT

PORTAGEVILLE BRIDGE PROJECT

SECTION 106 CONSULTING PARTIES MEETING

- -

Section 106 Consulting Parties Meeting held at the New York State Department of Transportation (NYSDOT) Region 4 Building, Genesee Conference Room, Third Floor, 1530 Jefferson Road, Rochester, New York, at the 20th day of March, 2014, commencing at approximately 1:00 p.m.

APPEARANCES: RAYMOND HESSINGER, Director
Freight and Passenger Rail Bureau

MICHAEL KOWALCZYK, Area Engineer
Federal Highway Administration

MARY SANTANGELO
NYSDOT Office of Environment

JULIE COWING, Consultant
AKRF

CLAUDIA COONEY, Consultant
AKRF

CAITLIN MEIVES, Preservation Planner
Landmark Society of Western New York

JOAN SCHUMAKER
Friends of Genesee Valley Greenway

DAVE HERRING, Capital Facility Manager
Allegheny/Genesee Regions of
New York State Parks

RICHARD PARKER, Regional Director
Genesee Region New York State Parks

1

2 APPEARANCES CONTINUED: CHRISTOPHER CARACCILO, Cultural Resources Coordinator-Region New York State
3 Department of Transportation

4 JOSEPH PICCIOTTI, ESQ.
Harris Beach PLLC
5 Norfolk Southern Corporation

6
APPEARANCES VIA TELEPHONE: NATHAN HOLTH
7 HistoricBridges.Org

8 JAY TOTH
Seneca Nation of Indians
9
ROBERT DAVIES, District Engineer
10 Federal Highway Administration

11 KELLY FANIZZO, Program Analyst
Advisory Council on Historic Preservation
12
JULIAN ADAMS, Director
13 Bureau of Community Preservation Services
Division for Historic Preservation
14
MELISSA BACH
15 Tribal Historic Preservation Officer

16 JARE CARDINAL, Director
Seneca-Iroquois National Museum at Seneca
17 Nation of Indians.

18 KAYLIE KRAMER, Environmental Specialist
Federal Highway Administration
19
CHRISTINE ABRAMS
20 Tonowanda Seneca Nation

21

22
REPORTED BY: DOROTHY MAIORANA, Court Reporter
23 GREATER ROCHESTER COURT REPORTING SERVICE
75 Barrett Drive #841
24 Webster, New York 14580
(585) 441-5184
25

1 SECTION 106 CONSULTING PARTIES MEETING

2 MR. KOWALCZYK: Good afternoon, everybody.
3 Welcome to the Section 106 Consultant Parties
4 Meeting. Everyone here and on the phone, my name
5 is Michael Kowalczyk. I'm an area engineer with
6 Federal Highway. Today we're going to be going
7 over the Section 106 Consultant Parties Meeting.
8 The purpose of this meeting is to seek and
9 consider the views of the consulting party members
10 pursuant to Section 106, the National Historic
11 Preservation Act regarding the Project, the
12 Portageville Bridge, to identify historic and
13 cultural resources and consider input on possible
14 measures to avoid, minimize or mitigate adverse
15 effects. This is basically your meeting to give
16 input and learn about the Project and to have a
17 nice open discussion after the presentations. As
18 the Federal agency for this Project Federal
19 Highways is responsible for Section 106 compliance
20 as carrying out its obligations in coordination
21 with NYSDOT and Norfolk Southern, who is the
22 Project sponsor.
23 I've introduced myself. I'll pass it off to
24 Ray. And then we'll do the table introductions.
25 MR. HESSINGER: I'm Ray Hessinger with the

1 SECTION 106 CONSULTING PARTIES MEETING
2 Department of Transportation. Today's meeting
3 is a facilitated meeting with the goal of
4 maintaining focus on the Section 106 process and
5 issues associated with historic and cultural
6 resources. This is an opportunity for a 106
7 consultation. The initial process is where
8 we'll have an opportunity to discuss other
9 issues associated with the Project.
10 There's a sign in sheet going around. If you
11 haven't already done so please sign in. Those
12 people on the phone we'll take care of that for
13 you. The meeting is scheduled to run from one to
14 three. We're going to try to stay on track to get
15 through the entire agenda and to allow time for
16 everyone here to have an opportunity to express
17 their views.
18 We have a stenographer present to assure we
19 have an accurate record of the views presented in
20 the group discussion. When speaking please state
21 your name and who you represent on behalf of your
22 group or organization. That includes those on the
23 phone.
24 You've all received information in the mail
25 and you've had an opportunity to review that.

1 SECTION 106 CONSULTING PARTIES MEETING
2 We're going to discuss that today. You'll
3 have the opportunity to provide written comments
4 within the thirty-day review period that started
5 when we sent the mailing out. At this meeting
6 you'll have the opportunity to ask us questions,
7 offer your views, exchange ideas about the ways
8 to avoid, minimize, or mitigate adverse effects
9 as to this Project.
10 Let's go around the table first and then we'll
11 go to the phone so everyone has a chance to
12 identify themselves.
13 MR. PARKER: This is Rich Parker, Regional
14 Director from Genesee Region New York State Parks.
15 MR. HERRING: Dave Herring, Capitol Facility
16 Manager for the Allegheny/Genesee Regions of
17 New York State Parks.
18 MS. COONEY: Claudia Cooney, AKRF Consultant.
19 MS. COWING: Julie Cowing, Office of AKRF.
20 MR. PICCIOTTI: Joe Picciotti from Harris
21 Beach in consult for Norfolk Southern.
22 MS. SCHUMAKER: Joan Schumaker, Friends of
23 Genesee Valley Greenway.
24 MS. MEIVES: Caitlin Meives with the Landmark
25 Society of Western New York.

1 SECTION 106 CONSULTING PARTIES MEETING
2 MS. SANTANGELO: Mary Santangelo, DOT Office
3 of Environment.
4 MR. CARACCILO: Chris Caraccilo, Region 4
5 Cultural Coordinator.
6 MS. KRAMER: Kaylie Kramer, Environmental
7 Specialist with Federal Highway.
8 MR. KOWALCZYK: Mike Kowalczyk again from
9 Federal Highway.
10 Nate, did you want to introduce yourself?
11 Those on the phone?
12 MR. HOLTH: I'm Nathan Holth. I'm with the
13 website HistoricBridges.org.
14 MR. KOWALCZYK: Those with the Seneca Nation?
15 MS. BACH: Melissa Bach, Tribal Historic
16 Preservation Officer.
17 MS. CARDINAL: Jare Cardinal, Seneca-Iroquois
18 National Museum Director. And Jay Toth is trying
19 to access the computer.
20 MR. KOWALCZYK: Do you have the presentations
21 on your computer or are you trying to get into the
22 WebEx? The WebEx isn't going to happen. Just
23 download from your email. You're just going to be
24 able to follow along on your computer. We're not
25 going to be able to do it real time with you.

1 SECTION 106 CONSULTING PARTIES MEETING
2 And then those with the Senecas just speak up
3 a little bit next time. The stenographer had a
4 difficult time hearing you.
5 Bob?
6 MR. DAVIES: Bob Davies from the Federal
7 Highway Administration.
8 MR. KOWALCZYK: Advisory Council?
9 MS. FANIZZO: This is Kelly Fanizzo, Program
10 Analyst from the Advisory Council on Historic
11 Preservation.
12 MR. KOWALCZYK: SHPO?
13 MR. ADAMS: Julian Adams. I serve as the
14 Agency Preservation Officer for Parks and Rec.
15 within the Division of Historic Preservation.
16 MR. KOWALCZYK: Anyone else at NYSDOT?
17 (No verbal response.)
18 MR. KOWALCZYK: Catherine didn't get on the
19 phone? Anyone else on the phone that I didn't
20 address?
21 (No verbal response.)
22 MR. KOWALCZYK: All right. Thank you.
23 MR. HESSINGER: With that I'm going to turn it
24 over to Mary Santangelo to give us a brief overview
25 of the Section 106 process.

1 SECTION 106 CONSULTING PARTIES MEETING
2 Those who are on the phone it's the
3 Section 106 presentation.
4 MR. KOWALCZYK: For everyone on the phone we
5 had someone else walk in. One second.
6 MR. CARACCILO: Christine Abrams.
7 MR. HESSINGER: Take a minute and introduce
8 yourself to everyone else.
9 MS. ABRAMS: Christine Abrams, Tonowanda
10 Seneca Nation.
11 MS. SANTANGELO: This is just a brief overview
12 of the Section 106 process just to provide some
13 context and background for the meeting, where we
14 are in the process and the package of materials
15 that you received in the mail.
16 Consultation is defined as the process of
17 seeking, discussing and considering the views of
18 other participants and, where feasible, seeking
19 agreement with them regarding matters arising in
20 the 106 process. We're here to consider ways to
21 avoid, minimize or mitigate any adverse effects
22 upon historic properties. As consulting parties,
23 all of you have a different role and a more active
24 role in the process than the general public.
25 Participants in the process include SHPO,

federally recognized Tribal Nations, local governments, Project applicants or sponsors and the Advisory Council under certain circumstances. They're notified by the Federal agency that the Project may have adverse effects on historic properties or under other circumstances. Other consulting parties are defined by their legal or economic relations through the undertaking or effect of properties or concerns with a project's effects on historic properties.

On the slides there's some examples of those that sometimes service consulting parties. There's a process to request consultant party status, which all of you have been through. Those requests were reviewed and approved by Federal Highway.

The general steps in the process appear on the screen now. In terms of where we are in the process at this point we just want to make you aware of the fact that the 106 process is building upon work that was already done when the Project was being progressed under the State Environmental Quality Review Act, Section 1409 of the New York State Historic Preservation Act and in

coordination with that. Because there are so many similarities between the State and Federal regulations, actions by State agencies, procedures and requirements are quite similar. Among the differences are the 106 Consultation process and who's involved in that. And the additional participants include the consulting parties, the Advisory Council and the special role of the Tribal Nations in 106 Consultation.

So for the identification of historic properties -- by historic properties we are referring to building sites, districts, structures and objects that are listed and/or are eligible for the National Register of Historic Sites. Generally, they are at least fifty years old. Criteria for evaluation are objective criteria for looking at these categories of historic properties and assessing their significance in American History in these different areas and also that meet one or more of the criteria on the next few slides.

The first, "A," is associated with broad patterns in history or contributions of events;

"B" has to do with associations with the lives of important people; "C" is about distinctive characteristics of types of periods of style, method of construction; and "D" is about the information that these properties can provide that is important to our history.

Letchworth State Park is listed in the National Register in 2005. The significance is under all four of the National Register criteria. With respect to the significant persons they are identified as William Pryor Letchworth and Mary Jemison. And there's a long list of areas of significance that cover the period from 1000 B.C. to 1952. One of the things that the National Register Nomination talks about is the archeological sensitivity of the park. All the resources are assumed to not have been identified. So for the Project, an area of potential effect was established. There will be more about that later. But that established the parameters for looking at the historic properties that may be affected. There were two phases of archeological survey that were conducted. The first was to determine the

general presence or absence of archeological resources. The second was to gather sufficient information to make a determination to register eligibility. As a result one of the historic archeological sites was identified. The Cascade House is also referenced in the National Register nomination, it's the mid-nineteenth to twentieth century hotel. There are foundations that remain. It was determined that archeological deposits associated with this site within the APE are not contributing to the potential eligibility. Again there will be a little bit more about this site later.

In terms of pre-contact or prehistoric artifacts found in two locations, which cannot be dated to any particular time period, these were interpreted as isolated finds with limited distribution. So in general there were found to be no National Register eligible archeological deposits within the APE for this Project.

With regard to other categories of historic properties in Letchworth Park -- which as we all know it's a very large area. It's known as the Grand Canyon of the East. This is a photo of

1 SECTION 106 CONSULTING PARTIES MEETING
2 William Pryor Letchworth and this is a cabin
3 and statute that represents Mary Jemison. The
4 Glen Iris Inn, which was formerly a home of
5 William Pryor Letchworth. The nomination serves
6 as a basis for identifying many of the other
7 properties within the park that contribute to
8 its National Register listing. Park features
9 include the Portage High Bridge, the subject of
10 this Project, identified as an important
11 engineering feature and some of the associated
12 trails, fieldstone walls and many other
13 resources. To assess the Project's affect
14 Federal Highway in coordination with DOT, and in
15 consultation with SHPO and other consulting
16 parties, applies the criteria of adverse effects
17 as seen on this slide that says that the Project
18 effect comes directly from the regulations.
19 An example of that adverse effect may include:
20 Physical destruction or damage; alteration and that
21 would include alteration not included as consistent
22 with the Secretary of the Interior's standards for
23 treatment of historic properties. That may be
24 repair or maintenance so the resource can remain.
25 Removal of properties from historic

locations or change of physical features within the property setting that contribute to its significance.

All of the analyses is documented by standards that are based on 106 regulations. They should provide enough information for any reviewing party to understand the basis of the findings. These include: The effect of properties, the nature of the Project's effect on those properties and the proposed resolution of adverse effects. When the Project has the potential to adversely affect historical properties the purpose of consultation is to seek ways to avoid, minimize or mitigate any adverse effects. As part of that process Federal Highway notifies the Advisory Council and invites their participation and consultation. This has already occurred. And as referred during the introduction the Advisory Council is on the phone for today's meeting.

MS. FANIZZO: Can I make a quick clarification? The Advisory Council was notified. We have not yet responded. I'm participating in this meeting to help inform our determination as

to whether we should fully participate in consultation. We are, however, a cooperating agency for this Project.

THE COURT REPORTER: I'm sorry. I don't know who that was.

MR. KOWALCZYK: That's Kelly from ACHP.

MS. FANIZZO: Sorry. Yes, Kelly Fanizzo.

MS. SANTANGELO: So ultimately any adverse effects that cannot be avoided are resolved through mitigation measures as stipulated in an MOA.

And that briefly summarizes what the package is about for review.

MR. HESSINGER: Thank you, Mary. With that I'm going to turn it over to Julie, who's going to give us a presentation about the Project and alternatives that were considered.

MS. COWING: I'm going to try, for the people on the phone, to keep saying what slide I'm on. I'm on Slide 2, which is the Project location. I'm just going to give you a little context of the need for the Project, the reason that Norfolk Southern needs to fix or replace this bridge and the alternatives that were considered. This slide shows a map of New York State, obviously. And it

shows the Norfolk Southern Tier rail freight route in a blue line. The Southern Tier route is part of the Norfolk Southern network connecting Buffalo and Binghamton. It is their private property owned by Norfolk Southern but it does pass through Letchworth State Park, where it crosses the Genesee River.

The next slide, which is Slide Number 3, shows the map of the Southern Tier route in a sort of bigger context by Norfolk Southern, Canadian Pacific and some short-line railroads between Buffalo and Binghamton. But it also connects to Norfolk Southern Railroad's larger network as far west as Chicago, up into Maine, and down almost to New York City.

The next slide shows you how many carloads crossed the Portageville Bridge in 2009, which doesn't matter right now. But it shows you the network of routes they have and how important this route, the Southern Tier route, is to Norfolk Southern's operations. But at the same time the bridge is a bottleneck for them.

The next slide shows maintenance workers on the bridge. The bridge has reached the end of its

useful life. It requires unprecedented levels of inspection and monitoring and frequent repair. In 2009 they had to close down the route for almost -- for three or four days because they found structural cracks and broken rivets. I might have actually shown where the crack is. I think it's that big scary crack in the top right.

MR. HESSINGER: That would be it, yes.

MS. COWING: So they had to shut the route down and stop using it for three days. That's going to happen more and more. This is becoming not safe. So, basically, what the need for this Project is, is for a route for Norfolk Southern. And the bridge is an important point in the route because it's become a bottleneck. It imposes weight restrictions and speed restrictions on the trains on the entire route because of this single bridge. Sort of as a side fact, but not unimportant, it's also dangerous for people in the park who go on the bridge to see the really great view from the bridge. But it's not intended for pedestrians. There really isn't enough room and it's not safe. So that's an extra thing the

Project is intended to fix. The purpose of the Project is to provide modern rail crossing of the Genesee River on the Southern Tier route that meets industry standards for weight and speed as much as possible given the curves there and reducing the unprecedented ongoing maintenance costs for Norfolk Southern.

The next slide, which should be Slide 7 if you're trying to follow along --

MR. PICCIOTTI: I would just add your points are well taken. This is Joe Picciotti from Harris Beach. It needs to be repaired. It's at the end of its useful life. It is being monitored. It can be operated and is being operated safely. If there's an issue we would close it down. I just wanted to add that.

MS. COWING: On Slide 7 you can see milestones in the project's environmental review.

MS. CARDINAL: We don't have numbers on the printout.

MS. COWING: It says previous planning activities.

MS. CARDINAL: Thank you.

MS. COWING: So an Environmental Impact

Statement has been prepared following New York State's environmental regulations, New York State Environmental Quality Review Act. That process began in 2008. I'm not going to read each bullet to you but there were several public hearings, comments were taken. There was a comment period on the Draft Environmental Impact Statements in early 2013. And after the comment period closed Norfolk Southern began to prepare a Final Environmental Impact Statement, which would be the end of the process. Federal funding through the Congestive Mitigation and Air and Quality Program became available for the bridge. That was a good opportunity for the railroad to help pay for the cost of the bridge but it requires review under the Federal process, not the New York State process. So we have begun to prepare a National Environmental Policy Act or NEPA Environmental Impact Statement.

I think Mary said this before. The SEQR Environmental Impact Statement included consideration for historic resources following New York State's regulations Section 1409. Now

we're following Federal regulations Section 106.

So the next slide gives you a quick overview of the alternatives that were developed and considered during the environmental study. I'm showing in a greenish color the two that remain at this point for further consideration and a pinkish color those that do not meet the project's purpose and need. I'm going to go through those now in a little more detail. The two that are left in the environmental studies are the no-action alternative we can use to compare the affects with what would happen if I did nothing and what we used to call Alternative 4, which is now the preferred alternative, which is a new bridge just south of the existing bridge and removal of the existing bridge.

The next slide describes the first three alternatives: One, two and three.

Alternative 1 is the no-action alternative. That's just what happens if I keep the level of maintenance going that I have now. I keep the bridge in as good of shape as I can. This alternative won't be okay forever. The useful life of the bridge will be reached and this alternative

1 won't let the railroad continue to operate
2 indefinitely. Right now it's okay but it's not
3 a good long-term option.
4 Alternative 2 is repair and retrofit the
5 existing bridge so that it can meet weight
6 standards. I think that if people want to hear
7 about this more later Ray Hessinger can elaborate.
8 But this would require basically rebuilding and
9 strengthening the bridge structure. You couldn't
10 leave it as it is. You'd have to either
11 strengthen or replace trusses and tower legs.
12 So it wouldn't be the bridge as it is now. It
13 would be a changed bridge. It would nonetheless
14 have the problems of fatigue and corrosion
15 that it has now. This may slow it down a little
16 bit but the bridge would still have a life
17 that wouldn't be forever. At the same time
18 you'd have to close the bridge down for
19 eighteen months to do this work, which would
20 mean Norfolk Southern couldn't use the Southern
21 Tier route. That has a great cost to them.
22 It requires them to stop serving some customers.
23 So this doesn't meet the purpose and need for
24 the Project.
25

Alternative 3 would be a new bridge on the same alignment, meaning demolish the old bridge, then put the new bridge right there. That would be fine except, again, you'd have to close down the route for eighteen to thirty-one months, depending on what new bridge you're building. So that cost and closure of the route for that period of time doesn't meet the project's purpose and need.

The next slide shows Alternatives 6 and 7. These are alternatives that would take the Southern Tier route out of the park altogether. Instead of going through the park it would go -- on the slide it shows yellow -- outside the park down past south of the Village of Portageville. This alternative is about four and a half miles of new route. It costs more than three times more than the preferred alternative or any of the other alternatives. It requires acquisition of fifty-four acres of private property and has six new bridges, including one that's a mile long and three new crossings. So basically it's found to be impractical, a bad idea and not meeting the project's purpose and needs.

1 SECTION 106 CONSULTING PARTIES MEETING

2 Alternatives 8 and 9 reroute traffic across
3 the Southern Tier route altogether. So disband the
4 route and do it a different way instead. This
5 requires Norfolk Southern to work a long
6 complicated route counter to the investment
7 they've already made in the Southern Tier route.
8 It would cost them a lot more. It doesn't meet
9 their business plan. Therefore, it doesn't meet
10 the project's purpose and need.

11 Alternative 5, which was evaluated in some
12 detail in the SEQR Environmental Impact
13 Statement, is a new bridge just south of the
14 existing bridge, similar to what's proposed
15 now but retain the existing bridge once the new
16 bridge is in place. This requires that someone
17 take responsibility for the existing bridge
18 once Norfolk Southern doesn't need it anymore.
19 No such someone has been identified.

20 MS. CARDINAL: No one will be identified in
21 the future or just right now that there is no one
22 identified?

23 MS. COWING: There is no one willing to take
24 the bridge and take responsibility for it.

25 MS. CARDINAL: Is that because of liability

issues?

MS. COWING: I'm not sure what the issues are. I think there's the maintenance cost. There's ongoing costs of maintaining it and taking care of that bridge. The Office of Parks Recreation Preservation has indicated it cannot take the bridge.

MR. HERRING: Another reason is the bridge is going to be discontinuous, once they do their new plan. It's not going to be usable.

MS. COWING: It's true that the bridge wouldn't be entirely left in place. The western two spans of the bridge that right now connect the land wouldn't be there anymore because of some work that's going to be needed for the new bridge. But you could if you wanted to make a way for pedestrians to get on the bridge. It wouldn't be unusable. But if there's no one to take ownership for the bridge then it doesn't work.

MS. CARDINAL: Is there a time limit or end time of who could be identified as a new owner or operator? Has there been a time set or dates set when if you don't have someone by a certain date?

MR. HESSINGER: We haven't set a date. But at the same time we've been working on this Project and meeting with the public since 2008. So we've been at this for six years discussing and noting the fact that nobody has stepped forward to take ownership. And that remains the case after six years of public meetings.

MS. COWING: Could we save this discussion until our discussion part?

MR. HESSINGER: Yes. I think we'll table it for now.

MS. COWING: I have just a few more slides and then we have some discussion of impact and resolution of impacts. Then we'll have an open table discussion.

So the next slide shows a view from the SEQR Environmental Impact Statement how the alternative would look with the two bridges together.

So the next slide should show what we used to call Alternative 4, which we're now calling the preferred alternative. Basically the same thing, a new bridge, approximately seventy-five feet south of the old existing bridge. The old bridge is removed. This bridge is an arched structure. The

old footings from the old bridge would be removed also. On the left side, the west side of the river -- we'll talk about this in a little bit -- but the way the arched structure would be anchored into the gorge wall that requires moving a very small piece of Park Road farther west to get it away from the bridge wall, also moving the gorge trailhead and the parking lots that are there just to get them away from the construction area where the bridge would be anchored. The Mary Jemison Trailhead that's currently at the parking lot would, therefore, also have to move. Otherwise, it would be kind of almost under the new bridge.

The next slide shows the view of today's bridge and the view of that new bridge.

Now I'm going to turn it over to Claudia. After we'll talk about the impact on historic properties.

MS. COONEY: I'm going to discuss the effects of the Project on the historic properties. This is largely a summary of information that was contained in the finding documentation that was sent to everybody. This graphic shows the existing bridge

in gray with the new bridge just to the south of this. Julie just went through this. It requires the removal of the existing Historic Portage High Bridge and then the removal and relocation of certain elements of Letchworth State Park on the west side of the Genesee River. Construction of the Project would affect a little over nine acres. Just to sort of give an order of magnitude that's within a much larger area. The park is over fourteen thousand acres.

As Mary indicated, one of the first steps for the Section 106 process is to delineate an area potential effect, to identify impact on historic properties. This map shows that area of potential effect. There's a direct area of potential effect. That shows the red area here. And then there is an of area of indirect effect and it's been delineated around that. It's about eight hundred feet to a half a mile around the direct effects area. You can see from this map that a large portion of the area of potential effect encompasses Letchworth State Park, which is listed on the National Register, and it shows the

location of the Portage High Bridge itself, which is shown as Resource Number 2 on this map. As Mary had indicated earlier, archeological investigations were undertaken for the direct area potential effect or direct PTE. No adverse effects on archeological resources have been identified. The pre-contact artifacts that were found, as Mary indicated, were found to be of a limited distribution. One set of them were found in a disturbed context. They were stone shards, primarily for tool manufacturing. The SHPO determined these pre-contact artifacts were not National Register eligible. There were a number of nineteenth to twentieth century artifacts were found. All the resources or artifacts that have been found were all on the east side of the Genesee River. There were none found on the west side. Many of the artifacts that were found for the nineteen to twentieth century were related to the Cascade House, which is shown here in this photograph. The Cascade House was an inn located on the east side of the Genesee River, south of the railroad right-of-way. It burned down in the 1960s.

Some of these artifacts that were that found were ceramics, glass but also architectural materials, including nails, roofing-type materials. The actual foundations of the Cascade House are outside the area that would be disturbed for project construction. SHPO concurred with the results of the archeological studies. These reports were submitted to the Seneca Nation, the Seneca Tonowanda Nation and the Tuscarora Nation.

This is a map that shows contributing resources in Letchworth State Park within the area of potential effect. That includes the Portage High Bridge, of course, which is Resource 1; the Glen Iris Inn to the north, with other associated features that include parking lot, landscaping, trees; the two trails; the Gorge Trail and the Mary Jemison Trail, which are shown as Resources 3 and 4. Over on the east side of the Genesee River there is the Genesee Valley Greenway Finger Lakes Trail and remnants of a nineteenth-century canal. Other resources that would be affected on the west side of the Genesee River include the Park Road and some

fieldstone walls and then the resource between the Portage Bridge and the Glen Iris Inn is the Upper Middle Falls picnic area and has a lot of nice picnicking areas. And the Gorge Trail runs along the east side of it.

MS. CARDINAL: This is Jare at the Museum again. What do you define as historical?

MS. COONEY: The items that were just discussed were resources that were described in the National Register Nominations Form for Letchworth State Park.

MS. CARDINAL: I guess I'm not being clear. Are you dividing it up so that archeological, native and historical -- I don't see anything and you haven't added anything that is of historical interest for native people. I don't see where there are historical interests . . .

MS. COONEY: I think I've tried to reference actual built features within the park.

MS. CARDINAL: Are you considering trails and other things that are important to native identity as historical?

MS. COONEY: Well, we were using the National Register Nomination Form as the basis.

1 SECTION 106 CONSULTING PARTIES MEETING

2 MS. KRAMER: This is Kaylie Kramer from
3 Federal Highways. If you don't mind we're going
4 to hold that conversation for the roundtable
5 discussion. Just so we can have the appropriate
6 people jumping in to answer that. We have
7 people who are very familiar. So we'll get
8 through the slides and then we'll get right into
9 that.

10 MS. CARDINAL: The rest of it's immaterial.

11 MS. KRAMER: Maybe just mute your phone for
12 any side conversation.

13 MS. CARDINAL: I was saying it so you could
14 hear me. The rest is immaterial.

15 MS. COONEY: I'm going to talk about
16 the changes that are going to occur to building
17 features as described in the nomination form.
18 These include removal of the Portage High
19 Bridge. It would be demolished with a new
20 bridge built to the south. As Julie had
21 indicated, the Project would require that a
22 portion of the Park Road shift to the west to
23 offer construction of the new bridge.

24 The plan on the left shows existing
25 orientation of the Park Road and the plan to the

right shows how it would be shifted over to the west about seven hundred feet. There's a photograph which shows a view north on the Park Road just as it passes beneath the Portage High Bridge.

MS. COWING: This is Julie. You can also see in that same slide the shift in the trail.

MS. COONEY: The Project would require the removal of a small parking area, the High Bridge Parking Area, located south of the right-of-way and west of the Park Road. So you can see on the left the existing plan and on the right the relocation of that parking lot to the north of the railroad right-of-way. It would also require the removal and relocation of two trailheads: The Mary Jemison Trail and the Gorge Trail. So on the plan to the left you can see the Mary Jemison Trail starts just west of that parking lot and the Gorge Trail starts to run along the east side of the Park Road and runs northward. On the plan to the right you can see how both the Mary Jemison and the Gorge Trails would be rebuilt, those two trailheads.

In the photograph on the left at the bottom you can see the Gorge Trail where it starts off

from the Park Road. Steps would take you down and then the path proceeds north along the Park Road in the photograph to the right you can see the Mary Jemison Trail extending west from the High Bridge parking area.

A number of fieldstone walls would need to be removed where construction would occur. That would be in the area of the Park Road, the walls along the Gorge Trail as well. There would be no changes to other built features of the park that are identified as contributing in the National Nomination Form. These include the Glen Iris Inn, which is the top photograph on the right; the Genesee Valley Finger Lakes Trail; and fragments of the Genesee Valley Canal. There'd be no changes also to the Upper Middle Falls picnic area.

The photograph in the middle shows from the Glen Iris Inn, a stone patio. If you look to the south you can barely see the Portage High Bridge extending above the treeline. The photograph on the bottom shows a view from the Genesee Valley Greenway Finger Lakes Trail. On that trail it's very densely vegetated forest. It's very hard to

get to the bridge except in a few locations. So there's limited visibility from these resources to the proposed project. Removal of the Portage High Bridge and alterations to other contributing resources within Letchworth State Park -- FHWA in coordination with NYSDOT -- has determined that the Project would have an adverse effect on Letchworth State Park.

Measures have been proposed to avoid and minimize adverse effects. We've enclosed the preparation of the avoidance plan for the Cascade House to ensure that construction doesn't occur in the area of the Cascade House historic site. There have been some markers put out there and there will be construction fencing put along the southern boundary of the construction area to ensure construction doesn't by accident extend into that area. There would also be a construction protection plan for other built features of the park that are in proximity to the construction. These include portions of the Gorge, Mary Jemison and the Genesee Valley Greenway Finger Lakes Trails and some of the fieldstone walls.

So some of the measures for mitigating adverse effects have been proposed. These are included in the draft memorandum of agreement that has been sent around to everyone. They include: Educational and interpretive materials, including interpretive exhibits of Letchworth State Park; supplemental historic American engineering records; documentation for the traditional tribal photographs; historical narrative of the bridge; the rebuilding and restoration of portions of the Gorge Trail. So this would include the portion of the trailhead that would have to be relocated. It's envisioned that where possible stone salvage from the original trailhead could be used to rebuild the new trailhead and also the section that's proposed for construction area and repair.

MS. COWING: I think at this point we're going to take just a short break.

MR. CARACCILO: We'll take a very short break and come back in about five minutes. If you have any questions on the presentations then we'll begin our roundtable discussion.

1 SECTION 106 CONSULTING PARTIES MEETING
2 (Whereupon there is a short recess in the
3 proceedings.)
4 MR. HESSINGER: We're back. The next item on
5 our agenda is the roundtable discussion and the
6 resolution of adverse effects.
7 MR. KOWALCZYK: We're first going to ask if
8 you have any questions on the presentations.
9 And for housekeeping -- before everyone gets
10 into -- for housekeeping, for the stenographer in
11 our room, please state your name before you talk so
12 that she can keep a record. I know it's going to
13 be annoying every time but just address the table,
14 address the room and then provide your comments or
15 questions.
16 MR. HESSINGER: Are there any further
17 questions on the presentations? We have two: One
18 having to do with the time frame for funding or
19 finding another owner of the bridge, the other
20 regarding the trails and other historic features
21 and what is considered.
22 Any other questions on the presentation before
23 we jump into it?
24 MS. CARDINAL: This is Jare with the Museum.
25 One of the questions I have and, Christine, I

don't know if you had an opportunity but it says that SHPO made the determination of archeological artifacts. Did I understand that correctly?

MR. ADAMS: This Julian from SHPO. Our archeologists looked at those materials, yes. I didn't personally.

MS. CARDINAL: There's been some changes in our end of the Seneca Nation. Were the Chippewa or the Tonowanda people involved in that determination?

MR. ADAMS: Nancy is the person who is our contact with SHPO. I'll have to ask her directly. I have to apologize for not knowing that.

MR. CARACCILO: She did work with us at the time, the people at the Seneca Nation and Tonowanda. We did meet in person at a meeting in Letchworth.

MS. CARDINAL: I was in on that meeting in 2010. I wasn't sure if anyone raised some concerns about the archeology at that time. I don't know if it was ever . . .

MR. CARACCILO: We do have emails from the Seneca Nation stating that they had no further

concerns.

MS. ABRAMS: Jare, I don't remember. I could have had discussions with Nancy and went over it. That's how that statement was made. I'll have to look at that again. I can't remember.

MR. HESSINGER: Any other questions on the presentation? I'm hearing none.

We'll move on to the roundtable.

MR. CARACCILO: The roundtable discussion.

MR. TOTH: Jay Toth, Seneca Nation. Would you like me to start? A couple comments. Looking at the design of the bridge geometry and so forth thinking both environmentally and culturally --

THE COURT REPORTER: I'm sorry. I can't really hear him.

MR. KOWALCZYK: Jay, sorry to interrupt. Just speak a little bit clearer into your microphone so the stenographer . . .

MR. TOTH: I had a chance to work with the Santa Fe Northern Railroad on a large bridge project like this. The railroads have come a long ways in being sensitive to the cultural materials in the area. And so I was pretty impressed with those folks. If they could meet Santa Fe's

standards out west. We'll see how it goes.

In terms of the artifacts that tends to be an issue especially among highways in some form. I don't know if New York has a policy on those or not. I would suggest that any barrel pits that bring viable dirt to the area where the barrel pits are being archeologically surveyed -- because all the sand and gravel that people get at historic sites and barrel sites, artifacts and railroad beds and highway beds. So I would make it a point that the barrel pits be surveyed before excavating. I think that will solve future issues.

As far as the artifacts that were found, it seems we've tried to excavate the trail when they built the early bridge.

I'm just fairly new here so I'm not sure of the decision of placement of where those artifacts are. I reviewed the reports. I don't have much comment. But one comment I do have I'd like you to address here. A lot of states and highways do not take into consideration that the original Indian trails are historic. So I'll make that point to you. In your report you do say that the Gorge

Trail was first identified in 1700. So it is an original Indian trail. The Jemison Trail, it's the namesake that makes it historic. So I'm going to request the State and others to consider its adverse effect. Because you are going to remove those trails. Even if they've been modified they're still leaving a footprint.

With that said, I'm working with Federal Highways in Ohio. The new bridge, which sits right in an archeological area, the bridge is crossing it. One of the things that they're looking at is to have these trails going past that bridge, concrete parapet. Use that parapet and put a design on there, preferably something historic dealing with Mary Jemison or something with the trail there as an educational benefit for folks who are using those trails, not a piece of plain solid concrete pillar there.

So that would be my recommendation that they compromise with those trailheads in conjunction with the bridge parapet. I hope that we can talk about that further down the road.

So that's the couple points I'd like to make. Thank you.

1 SECTION 106 CONSULTING PARTIES MEETING
2 MR. HESSINGER: Thank you.
3 MS. CARDINAL: This is Jare with the Seneca
4 National Museum. I think I've stated my concerns.
5 It gets back to the normal situation in these
6 types of things. I haven't seen all the reports
7 I'm sorry to say. But I don't see too much here
8 about the impact on the eastern side. I know
9 in the discussion, I think in 2010 was the
10 archeology report that had been submitted at
11 that point, how this new bridge would be in
12 alignment with impact for the area that's highly
13 sensitive on the east side, including trails and
14 other aspects of history. And I don't see where
15 that's been addressed in what I've heard so far.
16 And maybe a conversation again with Nancy.
17 But I agree with Jay in that there's trails
18 and other things that, especially on the east side,
19 that still has an impact. I wondered what the
20 sources the archeologists were using. I just throw
21 that out there. You may not have the answers.
22 MR. ADAMS: I'm listening again. We didn't
23 include the archeo on this phone. I could call her
24 in to ask her some questions or would you like
25 to have an offline conversation?

MS. CARDINAL: We'll do it offline.

MR. HESSINGER: Is anybody else on the phone while we're dealing with those on the phone?

MR. HOLTH: This is Nathan Holth for HistoricBridges.org. I just had a couple comments I wanted to make. My main interest is the historic bridge that is proposed to be demolished. I've been in a Section 106 in a number of different states. This is the first time I've done it in New York State. So some of this stuff is a little unfamiliar to me. It seems like on the first meeting we had we've already determined it's impossible to look at any other alternatives. I'm a little bit disappointed in that. I would have liked to have seen a little bit more research into possible reuse of this bridge next to the replacement bridge. I know in Pennsylvania there's a bridge that a portion of it was lost by a tornado. It lost a part of it that provides an outlook. One of my thoughts is rather than leaving the entire bridge standing could a portion of the bridge be left standing as an outlook? And, you know, as far as the

ownership I'd be curious to know why -- or if they made clear the responsibilities. What is the case, is it funding? If it is could we be paying to maintain this bridge through an increased park fee or entrance fee to enter the bridge? Someone mentioned that people are trespassing on this bridge to get the view. As far as I can tell that's probably going to continue on the replacement bridge. It seems like it would be in everyone's interest if they had a publicly acceptable way for people to get this spectacular view.

That's my concern. I'd like to see a little bit more focus and maybe see if there's any way we could save a portion of this bridge.

MS. CARDINAL: Nathan, this is Jare at the Seneca Museum. I agree with you. I'm just saying looking at it from a historic preservation point. There's another similar bridge that they tore down several years ago. I'm wondering how many bridges like this are left. I hear that it is one with a spectacular view of the gorge.

MR. CARACCILO: Any other questions or comments from people on the phone calling in?

1 SECTION 106 CONSULTING PARTIES MEETING

2 MS. FANIZZO: This is Kelly from the Advisory
3 Council. I think my question is more of a
4 process-based one. Is there a schedule or
5 overall time line or milestones that we should
6 be aware of with this decision making on this?
7 Where are our opportunities for further
8 consultation?

9 MR. HESSINGER: As of right now we're
10 scheduled to have a draft of the DEIS at least to
11 the cooperating agencies at the end of April.

12 MS. FANIZZO: I missed what you said it was.

13 MR. HESSINGER: The end of April. The draft
14 of the DEIS, a preliminary draft to the cooperating
15 agencies for administrative review. So our time
16 frame is relatively tight to move forward.

17 MS. FANIZZO: So is there an opportunity when,
18 as the gentleman -- I apologize, I missed your
19 name -- from the Historic Bridge Association asked
20 to talk about any other alternatives to consider
21 ways to save even a part of the bridge?

22 MR. HESSINGER: I think it speaks to what we
23 talked about earlier. We've been at this for six
24 years or more. And to date there have been no
25 entities who have come forward with a willingness

to accept responsibility for the structure.

MS. FANIZZO: What kind of outreach did you do in the State review process to solicit that sort of interest?

MR. HESSINGER: Basically it was part of the DEIS that was published. There wasn't any separate outreach on that issue.

MR. PICCIOTTI: There were comments received about the issue through that process beginning with scoping and including the publication of the draft of the Environmental Impact Statement procedure and including the public hearing that was held under SEQR.

MS. FANIZZO: So in the SEQR document was it made clear that you were looking for folks to take the bridge or was the alternative listed as they are on the presentation we saw and no one came forward?

MR. PICCIOTTI: There was a full discussion about that alternative and there was a specific statement made that that alternative could not be furthered unless persons came forward who had the ability to take on the responsibility to the old bridge.

1 SECTION 106 CONSULTING PARTIES MEETING

2 MS. FANIZZO: I see. I think this is good
3 information to know. The folks from the SHPO
4 Office, in your experience in dealing with these
5 type of resources, are there any other entities
6 you think it might be worthwhile to outreach to?
7 Or do you think that's exhausted the realm
8 of preservationists who might be able to
9 maintain such a structure?

10 MR. HESSINGER: Julian?

11 MR. ADAMS: Ask that again, please. It was a
12 long statement about looking for other people to
13 take care of the bridge?

14 MS. FANIZZO: I'm happy to recap it and make
15 it shorter. The outreach that DOT did to the
16 public under the State Environmental Review
17 Process, including the statement that we need
18 someone to come forward and take care of the
19 bridge, in your experience dealing with these types
20 of historic resources in the State are you aware of
21 any other groups that didn't see the State
22 Environmental Review or it wouldn't have been on
23 their radar, anything that you think additional
24 outreach would be productive?

25 MR. ADAMS: It has a pretty high profile in

the region and Statewide. It's been in the papers, been on preservation organizations, regional preservation organization's radar. It's not that its been hiding. It's been known for some time. I have not bumped into anyone who's come forward. I would hate to say the usual suspects but there's an eager group of people out there who know about it and advocate on its behalf of historic resources in the area. I can't think of anybody else in the area or region that has been overlooked or doesn't know about it.

MS. FANIZZO: Okay. Thank you.

MR. CARACCILO: Any further comments from people on the phone?

MS. CARDINAL: This is Jare again. Has that been designated national historic?

MR. ADAMS: The bridge?

MS. CARDINAL: The bridge, yeah.

MR. ADAMS: The bridge is a contributing part of the Letchworth State Park Historic District that's listed on the National Register. So it is contributing an element of the historic listing of the entire park.

MS. CARDINAL: But not separate.

MR. ADAMS: I don't believe so.

MR. KOWALCZYK: No. I'm pretty sure, Julian, it's just a contributing element.

MR. ADAMS: To our mind it's no different than an individual listing. Honestly, it's no different. You would think it would be a National Historic Landmark, which this has not been identified as.

MR. HOLTH: This is Nathan Holth again for HistoricBridges.org. One other comment as I look at my notes I wanted to make. In the document that was mailed to me -- and there was some discussion in the presentation on possible methods to mitigate adverse effects -- assume that the bridge is to be demolished. Just a couple suggestions I had for mitigation. I don't know if they'd survive but if they do I'd also like to see part of that documentation would be to have the original plans, the original drawings. I'd like to see those scanned and included in the documentation.

I'd also like to say, if possible, some portions of whether it be the tower or the metal truss superstructure, or some portion of that

could be salvaged in, displayed somewhere like a sculpture of some sort. People could see some of the original iron and steel from the bridge. I believe there are some portions of the bridge that date to 1875. Maybe some of those older portions could be singled out. That would be kind of nice to salvage some of those for display somewhere.

MR. ADAMS: There's been discussion that Norfolk Southern would have to contract separately with the Historic American Engineering Record, which they are prepared to do, for full documentation of the bridge. Also, we are looking into whatever agreement that comes out to have salvaged portions of the bridge salvaged and also used as part of display. So we're all thinking the same direction.

MR. HOLTH: That's good to hear.

MR. PARKER: This is Rich Parker with the State Park Region. That is part of the plan. That's already listed in the MOU that portions of that will go into interpretive displays near the bridge and also possibly at the Letchworth Museum.

MS. COONEY: In Section A of the draft MOA

it discusses, under educational interpretive materials, salvage and conservation of certain amount of one of the piers to include both legs. The bridge does have date plates that say 1875.

MR. HOLTH: That's good to hear that's in there.

MR. CARACCILO: Anything else from the people calling in? Anyone in the room?

MS. MEIVES: I'll go ahead. This is Caitlin Meives of the Landmark Society of Western New York. We're a regional nonprofit preservation organization. I've been sort of familiarized and involved with this Project for about three years, even though there's staff that's preceded me and were involved prior to that. I just want to sort of reiterate basically the comments and the positions that we put forth in our comments on the DEIS process. Our position is that we reluctantly agreed with this preferred alternative of replacing the bridge. That was a difficult decision for us to arrive at but we thought that that was preferable to having two bridges right there on parallel alignment. We thought that would really

negatively impact the viewshed, which is as important in consideration as the historic resource itself. We sort of reluctantly came to that conclusion. My comments I'm going to want to direct at the proposed mitigation. I think that the documentation and the interpretive plan and salvaging some of the pieces, I think those are all great things that should definitely happen. But I think that's sort of baseline mitigation. That's a starting point. I don't think that's really enough in this situation with the resource that we are losing. I think it's a pretty basically-held tenet of preservation that, yes, there are times you have to demolish a historic resource. We get that. But if you're going to be replacing a historic resource what replaces it should be as good, if not of better design or architectural quality than what's being lost.

So in our comments to the DEIS we did want to see a design that was perhaps maybe not quote/unquote off-the-shelf design, something that really speaks to the importance of that landscape and viewshed and the resource that it's replacing.

The major issue with mitigation that we thought is the issue of pedestrian trespassing versus access. It's been a problem with this existing bridge for probably since the day it was built. And I think we may need to approach it rather than referring to it as pedestrian trespassing, approach it from a different direction. Pedestrians are going to try to access that bridge no matter what. It's just human nature and I think maybe we need to start from that perspective and see if there isn't a way to provide some kind of safe and legal pedestrian access on the new bridge.

And then the only other comment I had was relating to the abutment design. There isn't really a lot of renderings of what that's going to look like but we did have some concerns about that. And that's all from me.

MS. SCHUMAKER: Joan Schumaker from the Friends of Genesee Valley Greenway. As far as affecting the historic properties, with respect to the canal and the trails, really they're not going to be impacted. I think the main concern that we have is the construction materials and the

guidelines that are in that area to make sure that the companies that are working there follow the rules and put up signage that's appropriate when the trail has to be closed, et cetera. I agree with the Landmark Society's approach with respect to the viewshed being compromised by two bridges there. I, myself, believe that one bridge is enough but I also concur that we should have a way to access that bridge to view that gorge. I was born and brought up in that area. I've been there all my life. Almost everybody I know has been on that bridge. Not me, but everybody else. I think that it's important that that be given consideration. I know I've talked about it up to two years ago at some of the hearings. It keeps getting stonewalled. I think it's important that it happen.

MR. HESSINGER: Thank you. Parks?

MR. PARKER: I think pretty much everything that has been said covers most of our concerns. As Joan had mentioned we've been having these discussions for well over fifteen years or so. We had also brought up the possibility we would

like to see also if possible some pedestrian walkway or access. That's something that Parks has consistently asked for. Norfolk Southern has explained from their point of view why they don't feel that's appropriate or feasible. If there still could be some consideration of that we would certainly be appreciative of it.

MS. ABRAMS: My concern is what you brought up about east of the bridge or the new one.

MS. SCHUMAKER: This is Joan Schumaker again with the Friends of Genesee Valley Greenway. I was quite impressed with essentially everything that's been done as far as these findings are concerned. The east side, the fact that there's some care taken to find the areas that are of concern, and to map those out and keep those free of construction I think has been -- around the Cascade House and so forth -- that's a plus. I'm not personally aware of Native American trails on the east side, other than perhaps along the Gorge where the canal and the Greenway and Finger Lakes Trail are. I think there's very little area on the east side that's going to be impacted.

MS. CARDINAL: It's going to be disturbed

though. That's an impact. I know most of it has been disturbed before, but . . .

MR. CARACCILO: We have investigated where we are going to be constructing.

MS. CARDINAL: We'll have a discussion after with Chris and probably Nancy.

MR. CARACCILO: We do have an area of potential effect. We're not going outside of those borders. Just to make clear, letting you know we have definite areas of planned disturbances.

MR. KOWALCZYK: This is Mike Kowalczyk from Federal Highway. I guess for the tribes we would be interested -- I understand you don't want to put out to the public where your archeologically sensitive sites are. I think that's kind of where you were getting at during the presentations. You know, they have maps -- understanding and for the public sites -- that are contributing to the park. If there's something that we're not aware of but you don't want for the public record, you don't want people going out there and digging up your sensitive sites . . .

MS. CARDINAL: It's not just archeological

that's the thing. It's environmental. It's the existing, what's left of trails, things that have already been disturbed. It's not all archeological. I think there would be a good thing at some point to sit down and have a discussion about those issues.

MR. KOWALCZYK: That's where I was getting to. Basically, I understand you and Christine are going to talk. Let's talk with SHPO and then if we need to sit down and have a separate discussion, Federal Highway, I'm sure New York State is more than welcome to do that. If there's something that we need to know, if we need to look somewhere else, if you need to get certain things in line before you have that discussion with us we'll more than accommodate for that. If you know of something, you just want to double-check, go ahead double-check and then we'll have that conversation at a later date as soon as possible. We don't want to miss anything in this process.

MS. CARDINAL: Okay.

MR. HERRING: Dave Herring with State Parks. Just one thing, a technicality, Julian, help me

if I misspeak. In your letter to us all it says the party is not subject to Section 106. I thought that this was always subject to 106 because of Indian Nation Park Land.

MR. HESSINGER: It's more a question of timing.

MR. HERRING: Anyways it's a technicality. Not a big deal, just a point. The other piece that ties in with the Project overview -- again we've brought this question up before so the FRA could class those speeds. And what speeds are really going to be going through the park? We never got an answer. And that relates to sound because it's not linear. The faster they go -- it's not linear that you get "X" amount of decibels. It's probably going to be more like hyperbolic or asymptotic. We've never gotten an answer. Through the early audiology, the audible scenarios that were put through we think it was marginal. We'd ask if that was taken. Just a point because it's going to impact the park and Glen Iris. We've never been given those specifics ever. We've never been given a speed. It's based on speed "X" but we don't

know really what speeds are going to be used in the future now that you're going to have this bridge capable of modern loads and speeds.

MS. COWING: The bridge will be capable of modern speeds but it's still going to have a big curve.

MR. HERRING: They're taking some of the curve out.

MR. HESSINGER: It's not enough to change. Right now the speed on the bridge is ten. So they're slowing down to ten to cross the bridge. Speed of the new bridge . . .

MS. COWING: Speed of the new bridge would be thirty-five. There is an analysis of noise in the already published . . .

MR. HERRING: We read through that again to see.

MR. PICCIOTTI: The noise force changes because the slower it goes -- I call it the clickety-clack factor -- you've got more noise in some ways. The faster it goes there's different effects from the sound.

MR. HESSINGER: You also won't get the breaking and the acceleration because of the

constant speed.

MR. HERRING: Again, just bringing up points. The other piece is looking at the area of potential effect and gets into the ownership. I'm assuming we're going to get all these ownership issues ironed out and surveyed. That was one of the discussions. I don't know if that's part of this.

MR. HESSINGER: That's a separate issue than what we're here for.

MR. HERRING: That's pretty much it. The only other thing is in the draft MOA. I don't think that there's any reference to the Castile entrance.

MS. COWING: This draft MOA is for essentially Section 106 support.

MR. HERRING: So they're separate pieces?

MR. HESSINGER: Yes.

MS. COWING: I'm going to bring it up, whether it's appropriate or not, right now. We've had questions asked but we're not answering all of them. It seems that we probably should address those that we can.

MR. HESSINGER: Yes. I think that's

appropriate. Let me jump back. In terms of Nathan and a couple others that talked about whether portions of the bridge could be retained, with the exception of the two westernmost spans that would have to come down under Alternative 5. From a technical standpoint there's nothing that says that we couldn't leave those two spans or leave any other portion of that bridge up as a viewing platform or for something else. From a technical standpoint I didn't see any reason why it could not be done. It goes back to the issue of who's going to step forward and be the responsible entity, who can take ownership, maintain and accept the liabilities for that structure. Then there's impacts of the viewshed. We also have the river as designated a scenic river under the State. We also have special legislation, the Genesee River Act, which gives it protection that exists under the Federal Law. At least on the State side whoever that new owner's going to be would have to get a permit from DEC for that second bridge to remain. I know DEC has expressed their

reservations with respect to the visual impact of having two bridges there and is not entirely confident that they would permit that second structure there.

On culture a little bit, the issue of the not off-the-shelf design. Caitlin, I know we've spoken about this at the public hearing. In that the loadings that are referred to are significantly different and significantly greater than the loads that are now imposed in the Highway Department. So the bridge types that are available to use are more limited than the bridge types that are available to the Highway. So when you think about a signature bridge you're thinking about maybe some type of cable-stayed arch or something like that or suspension bridges. And those structure types, those do not work in this. They are not stiff enough. There's too much vibration in the structure and they're not a viable bridge type. So in looking at what types of bridges are available to us that can carry the loads and the site conditions we have -- there's a very deep gorge with near vertical walls. And

this is documented in the appendix. We do look at the types of bridges that were viable. And you ended up with essentially a bridge of very similar design to what the current bridge is. And considering the cost and constructablity factors, that's how we ended up with the arch.

MR. PICCIOTTI: We outreached, the DOT did, early on with park patrons and others. They liked the arch compared to the other designs.

MR. PARKER: I would echo that from the public hearings and Citizens Advisory Committee meetings and so on. The design was overwhelmingly preferred and quite honestly from a viewshed standpoint it's much less intrusive than what's currently there. It gives you a much more natural view.

MR. HESSINGER: Not only are you not working in the river to build the new bridge but also when you remove the piers and we remove the steel towers it returns the Genesee River to a completely natural condition at the bridge site.

Joe, I'll throw it to you. Do you want to address the pedestrian issue?

MR. PICCIOTTI: I think it's a pretty

straightforward answer and it's been consistent. I would say the answer has always been a safety issue for Norfolk Southern. Pedestrian access is problematic on the bridge when operating a rail bridge. Operating rail bridges are not good places for pedestrians. For what, I think, would otherwise be pretty obvious reasons whether it relates to pedestrian safety, safety of NS workers, potential concerns regarding the range from terrorists and otherwise having folks on an operating rail bridge is just a matter of company policy. It's not something we do. We'll continue to take steps to discourage and prevent possible trespassing on the bridge.

MS. SCHUMAKER: This is Joan Schumaker again. I've heard many examples of working railroad bridges with pedestrian access.

MR. HESSINGER: I wouldn't say many but there are examples of bridges with pedestrian access.

MS. SCHUMAKER: They can coexist and be successful. I think this is stonewalling.

MR. PICCIOTTI: I'm passing along Norfolk Southern's perspective. It's a freight bridge. There may be other companies that have -- and my

understanding is those examples are not bridges that carry freight as this one does but rather pedestrians.

MR. HESSINGER: The bridges that I'm aware of -- CN's bridge over the Niagara River, that every carrier interchanges in between Buffalo and New York uses that bridge, that has pedestrian access over it, at least part of the way. There's a bridge in Harpers Ferry, West Virginia. CSX has pedestrian access on it. There may be others but those are at least two that are everyday freight service that do have pedestrian access will note that the right-of-way today is Norfolk Southern's private property. At the end of the day when the bridge is done this is not a public roadway. It's private property of Norfolk Southern Railroad Corporation. In addition to the safety issues that Joe brought up I think we, on the public side, at least have to recognize the liability issues that they, as a private corporation, would be exposing themselves to by inviting the public on this.

Other than being aware of those structures I don't have any details on them or reference by which those facilities are open to the public.

1 SECTION 106 CONSULTING PARTIES MEETING

2 MS. MEIVES: This is Caitlin with the Landmark
3 Society again. I think the other concern we had
4 related to the pedestrian access. There are
5 certainly measures that Norfolk Southern will be
6 able to take to try and limit or prevent pedestrian
7 access. We have concerns that some of those
8 measures might negatively impact the surrounding
9 environment or viewshed of the landscape. I
10 have no mental pictures of what those measures
11 might be, what impact those might be.

12 MR. PICCIOTTI: Those being developed are
13 certainly beyond the bridge structure that's there.
14 The major one would be used to secure the site and
15 secure the right-of-way. I'm certainly not
16 aware of any negative impact on the viewshed
17 prospective.

18 MR. HESSINGER: Right now the right-of-way
19 is . . .

20 MR. PICCIOTTI: It would be fencing. It would
21 be potentially gates or some other similar
22 measures. It certainly wouldn't be out of
23 character with operating a rail bridge and the
24 setting it's in.

25 MR. HESSINGER: The next thing I want to

touch on is with Joe about the notification of the construction plan. One of the comments you submitted under the CPAIS and asked to provide notification for appropriate signage to users of the trail.

MS. SCHUMAKER: The plan is going to be created by Norfolk Southern. Who approves this, reviews this?

MR. HESSINGER: Ultimately, Norfolk Southern prepares that. They're the ones who are going to hire the contractor and they'd be the ones with direct oversight over the construction. State DOT and Federal Highways have a review role, plans, specifications and estimates. That's going to be part of that. It's going to be directed to the contractor to take certain actions.

There was a comment about, I think, Jay -- about something on the concrete of the abutments. Early on in the review of the Project under Section 1409 when Norfolk Southern and Parks were having discussions with respect to the bridge the issue of either making it look like stone were considered. Ultimately, Parks thought it was not appropriate for the bridge to give it a full

historic look with stone. This type of bridge would never be set on stone abutments.

However, I think the thing that you're talking about is a little bit different than the discussion we had earlier with respect to a stone look. And certainly I'll let Joe speak to that.

MR. PICCIOTTI: The one thing -- I know the comment. I wasn't sure whether that related to some kind of in-river structure but there won't be for the new bridge. I'm not sure what stone structure he was focused on. Because other than having to do with trails and otherwise I'm not aware of . . .

MR. HESSINGER: My understanding is with respect to the concrete piers on the approach spans rather than having a stone look whether there could be some other type of something imprinted in the concrete -- we've started stamping images on highway bridges -- something like that. I don't see that as something that's outside the realm of possibilities.

MR. TOTH: I can send you some samples, if need be, some ideas of what we're talking about. The fact the trails run there give us an

opportunity to provide something more to the public being the cultural and historic aspects there.

MR. HESSINGER: If you have some ideas.

MR. CARACCILO: Email them to me, Jay. This is Chris Caraccilo. If you email those to me I can disseminate them.

MR. TOTH: Sounds good.

MR. PARKER: This is Rich Parker with State Parks. Jay, is it something that could also be possibly incorporated into some interpretive signage at the site other than something that's on the structure?

MR. TOTH: We can do both. That's what we're doing over in Ohio. I think you better show me some things here. It's one thing to talk about but if you visually see it I think you have a different perception of it.

MR. PARKER: It would be helpful to see some examples.

MR. HESSINGER: I don't think I have anything else here that I think I can address that I haven't already. If anybody else wants to fling something at me that you think I should have covered or can

cover here that we haven't responded to please bring it up.

MR. KOWALCZYK: Anybody on the phone, did we miss anything that you'd like to talk about?

MR. CARACCILO: We can move on to the next step in terms of the review period with MOA.

MR. HESSINGER: The review period ends April 9th. We'll accept any further written comments until April 8th.

MS. SANTANGELO: Written comments then will be reviewed by DOT Federal Highway in consultation with SHPO and they'll be considered in terms of understanding what the adverse effects are and determining at that point what's needed I guess for complete resolution. It also would be incorporated essentially in revisions to the draft MOA. That would be sent out again for everyone to review. Normally, in these situations consulting parties have the opportunity to sign the MOA. They can concur with the process and their participation in it and sign as concurrent parties to the MOA. But the document would be provided for review of any changes that are made.

MR. CARACCILO: Please let us know if the Seneca Nation would like a meeting in the near future.

MR. KOWALCZYK: Mike Kowalczyk from Federal Highway. If any of the tribes -- just as Chris is saying -- any of the tribes reach out to me or Tricia Millington (phonetic) -- she's our Tribal point of contact in our office -- or myself for the bridge we'll make all the necessary accommodations to meet with you.

I guess the only other point for Federal Highway was ACHP, Kelly, reach out to me. I don't know if you're still on the phone but reach out to me to let me know what ACHP would like to do in terms of the Section 106 consulting party.

MS. FANIZZO: Sure. No problem. Julian, are you still on the phone?

MR. CARACCILO: I think he left.

MS. FANIZZO: I'm going to give Julian a quick call to follow up. Is Monday acceptable?

MR. KOWALCZYK: Monday's what we talked about. That'll be fine.

MS. FANIZZO: Great. Thanks.

MR. CARACCILO: Anything further from anyone

else on the phone?

MS. CARDINAL: Nope.

MR. CARACCILO: Thank you all for participating today. Any further questions or comments from the room?

MS. SCHUMAKER: Just a correction on Page 8. Cross out 1852.

MR. CARACCILO: Thank you all very much. Thank you for your time.

(Whereupon the meeting adjourned at 3:00 p.m.)

* * * * *

1 STENOGRAPHER'S CERTIFICATION

2

3 I, DOROTHY MAIORANA, being a Shorthand Reporter in
4 the County of Monroe, State of New York, do hereby certify
5 that I reported in Stenotype Shorthand the Portageville
6 Bridge Project, Section 106 Consulting Parties Meeting, held
7 on the 20th day of March, 2014, at the New York State
8 Department of Transportation, Region 4 Building, Genesee
9 Conference Room, Rochester, New York; and that the foregoing
10 pages number 1 through 72 were prepared under my direction
11 and control, and constitute a true, accurate, and correct
12 record of those Stenotype Shorthand notes.
13 I further certify that I am neither attorney nor
14 counsel for any of the parties, nor a relative or employee of
15 any attorney or counsel connected with the action, nor
16 financially interested in the outcome of the action.
17
18
19 _____
20 DOROTHY MAIORANA
21 Dated at Rochester, New York
22 this 3rd day of April, 2013.
23
24
25

Appendix C: Historic and Cultural Resources

C-4 Section 106 Correspondence

Portageville Bridge - Chronological Listing of Section 106 Correspondence

Date	From		To		Subject	Appendix
	Name	Organization	Name	Organization		
8/9/2010	Claudia Cooney	AKRF	Nancy Herter	NYSHPO	Transmittal of Phase I Cultural Resource Survey Report	C-4
9/13/2010	Christopher Caraccilo	NYSDOT	Christine Abrams/ Chief Darwin Hill	Tonawanda Seneca Nation	Transmittal of Phase I Cultural Resource Survey Report	C-4
9/21/2010	Christopher Caraccilo	NYSDOT	Chief Leo Henry& Stuart Patterson	Tuscarora Nation	Transmittal of Phase I Cultural Resource Survey Report	C-4
9/22/2010	Christopher Caraccilo	NYSDOT	Curtis Lazore	Haudenosaunee Cultural Resource Center	Copied on transmittal of Phase I Cultural Resource Survey Report based on protocol established with Tuscarora Nation	C-4
9/22/2010	Christopher Caraccilo	NYSDOT	G. Peter Jemison	NAGPRA Representative, Seneca Nation	Transmittal of Phase I Cultural Resource Survey Report	C-4
9/24/2010	Nancy Herter	NYSHPO	Claudia Cooney	AKRF	Request for information in response to the review of the Phase I Cultural Resource Survey Report and concurrence with conclusions	C-4
2/24/2011	Lauren Waldinger	Seneca Nation of Indians	Christopher Caraccilo	NYSDOT	Concurrence with Phase I Cultural Resource Survey Report; Seneca Nation of Indians' opinion of "No Adverse Effect"	C-4
5/9/2011	Christopher Caraccilo	NYSDOT	Ruth Pierpont	NYSHPO	Transmittal of Phase II Archaeological Investigation	C-4
5/9/2011	Christopher Caraccilo	NYSDOT	Lana Watt	Seneca Nation of Indians	Transmittal of Phase II Archaeological Investigation	C-4
5/9/2011	Christopher Caraccilo	NYSDOT	Christine Abrams/ Chief Darwin Hill	Tonawanda Seneca Nation	Transmittal of Phase II Archaeological Investigation	C-4
5/23/2011	Nancy Herter	NYSHPO	Christopher Caraccilo	NYSDOT	Concurrence with Phase II Archaeological Investigation. Also indicating no further archaeological concerns with the project	C-4
8/8/2012	Christopher Caraccilo	NYSDOT	Ruth Pierpont	NYSHPO	Transmittal of Phase I B Archaeological Addendum and Cascade House Avoidance Plan	C-4
8/8/2012	Christopher Caraccilo	NYSDOT	Lana Watt	Seneca Nation of Indians	Transmittal of Phase I B Archaeological Addendum and Cascade House Avoidance Plan	C-4
8/22/2012	Christopher Caraccilo	NYSDOT	Christine Abrams/ Chief Darwin Hill	Tonawanda Seneca Nation	Transmittal of Phase I B Archaeological Addendum and Cascade House Avoidance Plan	C-4
9/4/2012	Wm. Brian Yates	NYSHPO	Christopher Caraccilo	NYSDOT	Concurrence with Phase I B Archaeological Addendum and Cascade House Avoidance Plan	C-4
11/14/2013	Robert Davies	FHWA	Jamie Fosburgh	U.S. Dept. of Interior National Park Service	Invitation to participate as Section 106 Consulting Party	C-4
11/14/2013	Robert Davies	FHWA	Lauren Waldinger	Seneca Nation of Indians	Invitation to participate as Section 106 Consulting Party	C-4

Portageville Bridge - Chronological Listing of Section 106 Correspondence (Cont'd)

Date	From		To		Subject	Appendix
	Name	Organization	Name	Organization		
11/14/2013	Robert Davies	FHWA	Darwin Hill	Tonawanda Seneca Nation	Invitation to participate as Section 106 Consulting Party	C-4
11/14/2013	Robert Davies	FHWA	Neil Patterson, Jr.	Tuscarora Nation	Invitation to participate as Section 106 Consulting Party	C-4
11/15/2013	Raymond Hessinger	NYSDOT	Nathan Holth	Historic Bridges.org	Invitation to participate as Section 106 Consulting Party	C-4
11/15/2013	Raymond Hessinger	NYSDOT	Sally Walker	Genesee Valley Conservancy	Invitation to participate as Section 106 Consulting Party	C-4
11/15/2013	Raymond Hessinger	NYSDOT	Tania Werbizky	Preservation League of New York State	Invitation to participate as Section 106 Consulting Party	C-4
11/15/2013	Raymond Hessinger	NYSDOT	Ronald Ballinger	Castile Historical Society & Museum	Invitation to participate as Section 106 Consulting Party	C-4
11/15/2013	Raymond Hessinger	NYSDOT	Doris A. Bannister	Wyoming County Historical Office	Invitation to participate as Section 106 Consulting Party	C-4
11/15/2013	Raymond Hessinger	NYSDOT	Thomas Yots	Preservation Buffalo Niagara	Invitation to participate as Section 106 Consulting Party	C-4
11/15/2013	Raymond Hessinger	NYSDOT	Joseph Koscis	Western New York Railway Historical Society	Invitation to participate as Section 106 Consulting Party	C-4
11/15/2013	Raymond Hessinger	NYSDOT	William Brummett	Livingston County Historical Society	Invitation to participate as Section 106 Consulting Party	C-4
11/15/2013	Raymond Hessinger	NYSDOT	Edward Holmes	Friends of the Genesee Valley Greenway	Invitation to participate as Section 106 Consulting Party	C-4
11/15/2013	Raymond Hessinger	NYSDOT	Joanne Arany	Landmark Society of Western New York	Invitation to participate as Section 106 Consulting Party	C-4
11/15/2013	Raymond Hessinger	NYSDOT	Carol Rathbun	Friends of Letchworth	Invitation to participate as Section 106 Consulting Party	C-4
11/18/2013	Robert Davies	FHWA	Chief Leo R. Henry	Tuscarora Nation	Initiate Section 106 Consultation	C-4
11/18/2013	Robert Davies	FHWA	Melissa Bach	Seneca Nation of Indians	Initiate Section 106 Consultation	C-4
1/7/2014	Christopher Caraccilo	NYSDOT	Michael Kowalczyk	FHWA	Request FHWA approval of Section 106 Consulting Party status for seven organizations and individuals	C-4
1/17/2014	Michael Kowalczyk	FHWA	Christopher Caraccilo	NYSDOT	Approval of Section 106 Consulting Party status for seven organizations and individuals	C-4
2/11/2014	Christopher Caraccilo	NYSDOT	Julian Adams	NYSHPO	Letter transmitting Section 106 Finding Documentation and requesting concurrence with Adverse Effect recommendation	C-1

Portageville Bridge - Chronological Listing of Section 106 Correspondence (Cont'd)

Date	From		To		Subject	Appendix
	Name	Organization	Name	Organization		
2/13/2014	Christopher Caraccilo	NYSDOT	Bryan Printup	Tuscarora Nation	Email transmitting Section 106 materials due to point-of-contact change at the Tuscarora Nation	C-4
2/20/2014	Julian Adams	NYSHPO	Christopher Caraccilo	NYSDOT	Concurrence with Finding of Adverse Effect	C-1
2/26/2014	Daniel P. Hitt	NYSDOT	Michael Kowalczyk	FHWA	Request for FHWA concurrence with Adverse Effect finding; transmittal of Section 106 Finding Documentation and NYSHPO concurrence	C-1
3/5/2014	Michael Kowalczyk	FHWA	Charlene Dwin Vaughn	Advisory Council on Historic Preservation	Notification of Adverse Effect finding; provided documentation specified in 36 CFR 800.11(e)	C-4
3/5/2014	Julian Adams	NYSHPO	Christopher Caraccilo	NYSDOT	Comments on Preliminary Draft MOA	C-4
3/6/2014	Christopher Caraccilo	NYSDOT	Joan Schumaker	Friends of the Genesee Valley Greenway	Invitation to March 20, 2014 Consulting Party meeting and transmittal of Section 106 documentation including Finding Documentation and Preliminary Draft MOA	C-4
3/6/2014	Christopher Caraccilo	NYSDOT	Nathan Holth	Historic Bridges.org	Invitation to March 20, 2014 Consulting Party meeting and transmittal of Section 106 documentation including Finding Documentation and Preliminary Draft MOA	C-4
3/6/2014	Christopher Caraccilo	NYSDOT	Caitlin Meives	Landmark Society of Western New York	Invitation to March 20, 2014 Consulting Party meeting and transmittal of Section 106 documentation including Finding Documentation and Preliminary Draft MOA	C-4
3/6/2014	Christopher Caraccilo	NYSDOT	Dave Herring	OPRHP	Invitation to March 20, 2014 Consulting Party meeting and transmittal of Section 106 documentation including Finding Documentation and Preliminary Draft MOA	C-4
3/6/2014	Christopher Caraccilo	NYSDOT	Melissa Bach	Seneca Nation of Indians	Invitation to March 20, 2014 Consulting Party meeting and transmittal of Section 106 documentation including Finding Documentation and Preliminary Draft MOA	C-4
3/6/2014	Christopher Caraccilo	NYSDOT	Chief Darwin Hill	Tonawanda Seneca Nation	Invitation to March 20, 2014 Consulting Party meeting and transmittal of Section 106 documentation including Finding Documentation and Preliminary Draft MOA	C-4
3/6/2014	Christopher Caraccilo	NYSDOT	Bryan Printup	Tuscarora Nation	Invitation to March 20, 2014 Consulting Party meeting and transmittal of Section 106 documentation including Finding Documentation and Preliminary Draft MOA	C-4
3/27/2014	LaShavio Johnson	Advisory Council on Historic Preservation	Michael Kowalczyk	FHWA	Notification that ACHP will not participate in resolution of Adverse Effect pursuant to Section 106	C-4
3/28/2014	Nathan Holth	Historic Bridges.org	Christopher Caraccilo	NYSDOT	Comments on Project based on attendance at the March 20, 2014, Consulting Party meeting	C-4

Portageville Bridge - Chronological Listing of Section 106 Correspondence (Cont'd)

Date	From		To		Subject	Appendix
	Name	Organization	Name	Organization		
4/7/2014	Caitlin Meives	Landmark Society of Western NY	Raymond Hessinger	NYSDOT	Comments on Project based on attendance at the March 20, 2014, Consulting Party meeting	C-4
5/20/2014	Jay Toth	Seneca Nation of Indians	Christopher Caraccilo	NYSDOT	Seneca Nation of Indians' opinion of "No Adverse Effect"	C-4
5/30/2014	Michael Kowalczyk	FHWA	Daniel Hitt	NYSDOT	Adverse Effect determination for the Project	C-1
6/18/2014	Raymond Hessinger	NYSDOT	Dave Herring	OPRHP	Letter transmitting Revised Draft MOA	C-4
6/18/2014	Raymond Hessinger	NYSDOT	Melissa Bach	Seneca Nation of Indians	Letter transmitting Revised Draft MOA	C-4
6/18/2014	Raymond Hessinger	NYSDOT	Jay Toth	Seneca Nation of Indians	Letter transmitting Revised Draft MOA	C-4
6/18/2014	Raymond Hessinger	NYSDOT	Darwin Hill	Tonawanda Seneca Nation	Letter transmitting Revised Draft MOA	C-4
6/18/2014	Raymond Hessinger	NYSDOT	Bryan Printup	Tuscarora Nation	Letter transmitting Revised Draft MOA	C-4
6/18/2014	Raymond Hessinger	NYSDOT	Caitlin Meives	Landmark Society of Western New York	Letter transmitting Revised Draft MOA	C-4
6/18/2014	Raymond Hessinger	NYSDOT	Joan Schumaker	Friends of the Genesee Valley Greenway	Letter transmitting Revised Draft MOA	C-4
6/18/2014	Raymond Hessinger	NYSDOT	Nathan Holth	Historic Bridges.org	Letter transmitting Revised Draft MOA	C-4

AKRF

Environmental and Planning Consultants

440 Park Avenue South
7th Floor
New York, NY 10016
tel: 212 696-0670
fax: 212 213-3191
www.akrf.com

August 9, 2010

Ms. Nancy Herter
Historic Preservation Program Analyst, Archaeology
New York State Office of Parks, Recreation and Historic Preservation
Historic Preservation Field Services Bureau
Peebles Island, P.O. Box 189
Waterford, NY 12188-0189

Re: Norfolk Southern Railway, Portageville Bridge Replacement
Town of Portage, Livingston County
Town of Genesee Falls, Wyoming County

Dear Ms. Herter:

Enclosed for your review is the Phase 1 Cultural Resource Reconnaissance Survey Report prepared for the Norfolk Southern Railway Portageville Bridge Replacement project by Hartgen Archaeological Associates, Inc.

As you may know, NYSDOT and Norfolk Southern have been preparing environmental documentation to comply with requirements of the New York State Environmental Quality Review Act (SEQRA) including its associated regulations with respect to the proposed replacement of the Portageville Bridge. NYSDOT and Norfolk Southern are also applying to the U.S. Department of Transportation (USDOT), Federal Railroad Administration (FRA) for a grant of funds for construction of the Project under the Transportation, Housing and Urban Development, and Related Agencies Appropriations Act for 2010, referred to as the Transportation Investment Generating Economic Recovery (TIGER II) program. As required by the TIGER II program, NYSDOT and Norfolk Southern are preparing environmental documentation pursuant to the National Environmental Policy Review Act of 1969 (NEPA) and applicable federal rules and regulations. The assessment of the project's effects on cultural resources is being prepared pursuant to Section 106 of the National Historic Preservation Act of 1966.

We look forward to discussing with you the next steps for additional archaeological evaluations for sensitive areas that would be impacted by the proposed project.

Please do not hesitate to le me know if you have any questions at (646) 388-9745. Thank you.

Sincerely,

Claudia Cooney
Vice President

cc: Andre Krievs, Hartgen Archaeological Associates, Inc.
Janet Zuckerman, OPRHP, w/enc.
Thomas B. Lyons, OPRHP, w/enc.
Karin L. Stamy, Darrell L. Wilson, Norfolk Southern Corp.
Joseph D. Picciotti, Harris Beach PLLC
Julie Cowing, Chris Calvert, AKRF, Inc.

NEW YORK STATE
DEPEARTMENT OF TRANSPORTATION
REGION 4 DESIGN

1530 Jefferson Road
Rochester, New York 14623-3161

Ph. (585) 272-3360 Fax. (585) 272-7547

LETTER OF TRANSMITTAL

Sept. 13, 2010

Subject: Norfolk/Southern Railroad-Portageville Bridge, Wyoming and Livingston Counties

To: Christine Abrams/Chief Darwin Hill
Tonawanda Seneca Nation Office
7027 Meadville Road
Basom, NY 14013

Phone: **(716) 542-4244**
Fax: **(716) 542-4244**

From: Chris Caraccilo
Cultural Resources Coordinator

Phone: 585-272-4833
Fax: (585) 272-7547

We Are Sending You the Following:

- [ ] Preliminary Drawings
- [ ] Draft Letter/Memo
- [ ] Utility Information
- [ ] Final Prints
- [ ] Specifications/Estimates
- [x] Cultural Resource Survey Report
- [ ] Other

Copies	Dwg. No.	Date	Description
1		8/2009	Phase 1 Cultural Resource Survey- Norfolk Southern Railroad
			Bridge Crossing, Towns of Genesee Falls and Portageville
			Wyoming and Livingston Counties.

These are Transmitted (as checked below):

- [x] For your use
- [ ] For approval
- [ ] For review and comment (Return by _____)
- [ ] Comments as noted (Correct and return by _____)
- [x] Call if you have any questions
- [ ] As requested
- [x] For your information
- [ ] Reply requested
- [ ] Call upon receipt

Additional Instructions/Remarks:

Copy To:
- [x] File
- [ ] _____
- [ ] _____

Signed: Chris Caraccilo

NEW YORK STATE
DEPEARTMENT OF TRANSPORTATION
REGION 4 DESIGN

1530 Jefferson Road
Rochester, New York 14623-3161

Ph. (585) 272-3360 Fax. (585) 272-7547

LETTER OF TRANSMITTAL

Sept. 21, 2010

Subject: Norfolk/Southern Railroad-Portageville Bridge, Livingston & Wyoming Counties

To: Chief Leo Henry & Stuart Patterson
Tuscarora Nation
2006 Mt. Hope Road
via Leweston, NY 14092

Phone: (716) 662-7061
Fax: (716) 297-7355

From: Christopher Caraccilo
Cultural Resources Coordinator

Phone: (585) 272 -4833
Fax: (585) 272-7547

We Are Sending You the Following:

- [ ] Preliminary Drawings
- [ ] Draft Letter/Memo
- [ ] Utility Information
- [ ] Final Prints
- [ ] Specifications/Estimates
- [X] Cultural Resource Survey Report
- [ ] Copy of Letter/Memo

Copies	Dwg. No.	Date	Description
1		8/2009	Phase 1 Cultural Resource Survey Norfolk Southern Railroad
			Bridge Crossing, Towns of Genesee Falls and Portageville
			Wyoming and Livingston Counties

These are Transmitted (as checked below):

- [X] For your use
- [ ] For approval
- [ ] For review and comment (Return by _____)
- [ ] Comments as noted (Correct and return by _____)
- [X] Call if you have any questions
- [ ] As requested
- [X] For your information
- [ ] Reply requested
- [ ] Call upon receipt

Additional Instructions/Remarks: _____

Copy To:
- [X] File
- [ ] _____
- [ ] _____

Signed: Chris Caraccilo

NEW YORK STATE
DEPEARTMENT OF TRANSPORTATION
REGION 4 DESIGN

1530 Jefferson Road
Rochester, New York 14623-3161

Ph. (585) 272-3360 Fax. (585) 272-7547

LETTER OF TRANSMITTAL

Sept 22, 2010

Subject: Norfolk Southern Railroad-Portageville Bridge, Livingston & Wyoming Counties

To: Curtis Lazore
Haudenosaunee Cul. Res. Center
c/o Mohawk Nation Council of Chiefs
Via Box 366
Rooseveltown, NY 13683

Phone: (518) 358-4161
Fax: (518) 358-3488

From: Christopher Caraccilo
Cultural Resources Coordinator

Phone: (585) 272-4833
Fax: (585) 272-7547

We Are Sending You the Following:

- [ ] Preliminary Drawings
- [ ] Draft Letter/Memo
- [ ] Utility Information
- [ ] Final Prints
- [ ] Specifications/Estimates
- [ ] End of Field Letter
- [X] Copy of Letter/Memo

Copies	Dwg. No.	Date	Description
1		8/2009	**Cultural Resource Survey Report sent to Chief Leo R. Henry and Chief Stuart Patterson as well**
			Phase 1 Cultural Resource Survey-Norfolk Southern Railroad
			Bridge, Towns of Genesee Falls and Portageville
			Livingston & Wyoming Counties

These are Transmitted (as checked below):

- [X] For your use
- [ ] For approval
- [ ] For review and comment (Return by _____)
- [ ] Comments as noted (Correct and return by _____)
- [x] Call if you have any questions
- [ ] As requested
- [X] For your information
- [ ] Reply requested
- [ ] Call upon receipt

Additional Instructions/Remarks: I had an extra copy to send to you.

Copy To:
- [X] File
- [ ] _____
- [ ] _____

Signed: Chris Caraccilo

NEW YORK STATE
DEPEARTMENT OF TRANSPORTATION
REGION 4 DESIGN

1530 Jefferson Road
Rochester, New York 14623-3161

Ph. (585) 272-3360 Fax. (585) 272-7547

LETTER OF TRANSMITTAL

Sept. 22, 2010

Subject: Norfolk Southern Railroad-Portageville Bridge, Livingston & Wyoming Counties

To: G. Peter Jemison
NAGPRA Rep., SNI
Ganondagan Historic Site
Victor-Holcomb Rd.
PO Box 239
Victor, NY 14564

Phone: (585) 924-5848
Fax: (585) 924-5323

From: Chris Caraccilo
Cultural Resources Coordinator

Phone: (585-272-4833
Fax: (585) 272-7547

We Are Sending You the Following:

- [ ] Preliminary Drawings
- [ ] Draft Letter/Memo
- [ ] Utility Information
- [ ] Final Prints
- [ ] Specifications/Estimates
- [X] Cultural Resource Survey Report
- [ ] Copy of Letter/Memo

Copies	Dwg. No.	Date	Description
1		8/2009	**Cultural Resource Survey sent to Robert Dean**
			Phase 1 Cultural Resource Survey –Norfolk Southern Railroad Bridge
			Towns of Genesee Falls and Portageville
			Wyoming and Livingston Counties

These are Transmitted (as checked below):

- [X] For your use
- [ ] For approval
- [ ] For review and comment (Return by _____)
- [ ] Comments as noted (Correct and return by _____)
- [X] Call if you have any questions
- [ ] As requested
- [X] For your information
- [ ] Reply requested
- [ ] Call upon receipt

Additional Instructions/Remarks: I had an extra copy

Copy To:
- [X] File
- [ ] _____
- [ ] _____

Signed: Chris Caraccilo

OFFICE OF PARKS · RECREATION · HISTORIC PRESERVATION
NEW YORK STATE

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
518-237-8643
www.nysparks.com

David A. Paterson
Governor

Carol Ash
Commissioner

September 24, 2010

Claudia Cooney
AKRF Inc.
440 Park Avenue South
7th Floor
New York, NY 10016
(via email only)

Re: FRA, DOT, PKS
Portageville Bridge Replacement
Town of Portage, Livingston County
Town of Genesee Falls, Wyoming County
08PR04896

Dear Ms. Cooney:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). The SHPO has reviewed the Phase I Cultural Resources Investigation Report, prepared by Hartgen Archeological Associates and dated August 2009, in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended.

Based upon this review, the SHPO requests the following information:

1. Please provide an updated project map that includes (1) areas of slope greater than 12-15% and areas of previous ground disturbance delineated and labeled; and (2) the Cascade House, Loci A, B and C site limits delineated

2. The Native American history of the Genesee River valley is rich. We would recommend that the Seneca Nation of Indians Tribal Historic Preservation Office (SNITHPO) is contacted regarding additional historic references. These references may help expand the existing precontact and historic overviews.

The SHPO concurs with the recommendation for avoidance or a Phase II Site Evaluation of the Cascade House Historic Site (A05113.000072). If avoidance is opted for, a short-term and long-term avoidance plan will be necessary. Avoidance suggestions are enclosed.

If Federal permits or monies are involved, Native American consultation is required under Section 106 of the National Historic Preservation Act of 1966 and its implementing regulations 36 CFR 800.

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
518-237-8643
www.nysparks.com

David A. Paterson
Governor

Carol Ash
Commissioner

Please telephone me at ext. 3280 with any questions you may have.

Sincerely,

Nancy Herter

Nancy Herter
Scientist, Archaeology

cc. Janet Zuckerman, OPRHP *(via email only)*
Julian Adams, OPRHP *(via email only)*
Robert Dean, SNI THPO *(via email only)*
Jare Cardinel, SNI *(via email only)*
Chief Roger Hill *(via email only)*
Andrew Krievs, Hartgen Archaeological Associates *(via email only)*

OFFICE OF PARKS · RECREATION · HISTORIC PRESERVATION
NEW YORK STATE

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
518-237-8643
www.nysparks.com

David A. Paterson
Governor

Carol Ash
Commissioner

Office of Parks, Recreation and Historic Preservation (OPRHP) Avoidance Plan for the Protection of Archeological Sites

Short Term Site Avoidance/Protection

- The site(s) boundary (including buffer) will be clearly delineated on the final construction plans and identified as a "Sensitive Area/No Access".
- Each site will be protected with temporary fencing during all construction activities and signage stating "Sensitive Area/No Access".
- A preconstruction meeting with the construction contractor(s) is required to notify those in charge of the requirements to avoid/protect the site(s).
- Existing landscape at the site(s) will be maintained. Any proposed modifications will require consultation with the OPRHP.

Long Term Site Avoidance/Protection

- An archeology covenant will be transferred with each property containing the avoided/protected site(s).
- State and federal regulations that include restrictions associated with this project will include provisions for site(s) avoidance/protection.
- Unauthorized activities within the site boundaries will require notification to the OPRHP at (518) 237-8643, ext 3280.

SENECA NATION OF INDIANS
TRIBAL HISTORIC PRESERVATION OFFICE
90 OHI:YO' WAY
SALAMANCA, NY 14779
PHONE: (716) 945-1790 FAX: (716) 945-8133

February 24, 2011

Chris Caraccilo
New York State Department of Transportation – Region 4 Design
1530 Jefferson Road
Rochester, NY 14623

Re: Cascade Hotel Norfolk Southern Railroad Bridge Project
Town of Portage, Livingston County, NY

Dear Mr. Caraccilo,

Thank you for providing the information for the above referenced project. In accordance with Section 106 of the National Historic Preservation Act (36 CFR § 800), the SNI Tribal Historic Preservation Office has a finding of "No Adverse Effect" on historical properties eligible for or included in the National Register of Historic Places. We concur with the recommendations of the End of Field Work Letter, Phase II Archaeological Investigation by Hertgen Archeological Associates, Inc. that no further excavation is necessary for the Area of Potential Effect.

We have no further issues if the proposed plan is followed. If your scope of work for the project site changes at any time, please notify our office as soon as possible. Thank you.

Sincerely,

Lauren Waldinger
Tribal Archaeologist
Lauren.Waldinger@sni.org

THPO Ref. 11-3592

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
REGION FOUR
1530 JEFFERSON ROAD
ROCHESTER, NEW YORK 14623-3161
www.nysdot.gov

ROBERT A. TRAVER, P.E.
ACTING REGIONAL DIRECTOR

JOAN MCDONALD
COMMISSIONER

May 9, 2011

Ms. Ruth Pierpont, Acting Deputy Commissioner of Historic Preservation
NYS Office of Parks, Recreation
and Historic Preservation
P.O. Box 189 – Peebles Island
Waterford, NY 12188

RE:Portageville Bridge Replacement Project
Phase II Archaeological Investigation Report
Town of Portage, Livingston County
Town of Genesee Falls, Wyoming County
08PR04896

Dear Ms. Pierpont:

Enclosed is a Phase II Cultural Resource Survey Report (CRSR) prepared for the above referenced project. Based on our review of the CRSR, we concur with the report's findings and recommendations.

No response is necessary if the State Historic Preservation Office is in agreement with the eligibility recommendations in this report. Comments, including any requests for additional information, may be provided in writing within 45 days of the receipt of this letter. If there is no response within 45 days, we will assume concurrence with these recommendations.

Please contact me at (585)272-4833 or ccaraccilo@dot.state.ny.us with any questions or comments. We look forward to consulting with your office as the project progresses.

Sincerely,

Chris Caraccilo

Christopher P. Caraccilo
Regional Cultural Resources Coordinator, Region 4

Enclosures: CRSR Phase II Report.

cc: Joe Krupitza, NYSDOT Rail Bureau
M. Santangelo, Office of Environment, POD 4-1

NEW YORK STATE
DEPEARTMENT OF TRANSPORTATION
REGION 4 DESIGN

1530 Jefferson Road
Rochester, New York 14623-3161

Ph. (585) 272-3360 Fax. (585) 272-7547

LETTER OF TRANSMITTAL

May 9, 2011

Page 1 of 1

THPO # 11-3592

Subject: Portageville Bridge ReplacementProject
Town of Genesee Falls, Wyoming County, Town of Portage, Livingston County

To: Ms. Lana Watt
Seneca Nation THPO
90 O:hi'yoh Way
Salamanca, NY 14779

Phone: (716) 945-1790 x3589
Fax:

From: Chris Caraccilo
Cultural Resources Coordinator

Phone: (585)-272-4833
Fax: (585) 272-7547

We Are Sending You the Following:

- [ ] Preliminary Drawings
- [ ] Draft Letter/Memo
- [ ] Utility Information
- [ ] Final Prints
- [ ] Specifications/Estimates
- [x] Cultural Resources Survey Report
- [ ] Copy of Letter/Memo

Copies	Dwg. No.	Date	Description
1		5/3/ 2011	Phase II Archaeological Investigation Report
			Portageville Bridge Replacement Project

These are Transmitted (as checked below):

- [x] For your use
- [ ] For approval
- [ ] For review and comment (Return by _____)
- [ ] Comments as noted (Correct and return by _____)
- [x] Call if you have any questions
- [ ] As requested
- [x] For your information
- [ ] Reply requested
- [ ] Call upon receipt

Additional Instructions/Remarks:

Copy To:
- [x] G. Peter Jemison
- [x] File
- [ ] _____

Signed: Chris Caraccilo

NEW YORK STATE
DEPEARTMENT OF TRANSPORTATION
REGION 4 DESIGN

1530 Jefferson Road
Rochester, New York 14623-3161

Ph. (585) 272-3360 Fax. (585) 272-7547

LETTER OF TRANSMITTAL

May 9, 2011

Subject: Portageville Bridge ReplacementProject
Town of Genesee Falls, Wyoming County, Town of Portage, Livingston County

To: Christine Abrams/Chief Darwin Hill
Tonawanda Seneca Nation Office
7027 Meadville Road
Basom, NY 14013

Phone: (716) 542-4244
Fax: (716) 542-4244

From: Chris Caraccilo
Cultural Resources Coordinator

Phone: 585-272-4833
Fax: (585) 272-7547

We Are Sending You the Following:

- [ ] Preliminary Drawings
- [ ] Draft Letter/Memo
- [ ] Utility Information
- [ ] Final Prints
- [ ] Specifications/Estimates
- [X] Cultural Resource Survey Report
- [ ] Other

Copies	Dwg. No.	Date	Description
1		5/3/11	**Phase II** Archaeological Investigation Report
			Portageville **Bridge** Replacement Project

These are Transmitted (as checked below):

- [X] For your use
- [ ] For approval
- [ ] For review and comment (Return by _____)
- [ ] Comments as noted (Correct and return by _____)
- [X] Call if you have any questions
- [ ] As requested
- [X] For your information
- [ ] Reply requested
- [ ] Call upon receipt

Additional Instructions/Remarks:

Copy To:
- [X] File
- [ ] _____
- [ ] _____

Signed: Chris Caraccilo

OFFICE OF PARKS · RECREATION · HISTORIC PRESERVATION
NEW YORK STATE

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
518-237-8643
www.nysparks.com

Andrew M. Cuomo
Governor

Rose Harvey
Commissioner

May 23, 2011

Christopher Caraccilo
NYS DOT Region 4
1530 Jefferson Road
Rochester, NY 14623
(via email only)

Re: FRA, DOT, PKS
Portageville Bridge Replacement
Town of Portage, Livingston County
Town of Genesee Falls, Wyoming County
08PR04896

Dear Mr. Caraccilo:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). The SHPO has reviewed the Phase II Archaeological Investigation Report for the Cascade House Precontact and Historic Site (A05113.000072), prepared by Hartgen Archeological Associates and dated April 2011, in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended.

Based upon this review, the SHPO concurs that the research potential of the Cascade House Site has been exhausted and has no further archaeology concerns with this undertaking.

Please telephone me at ext. 3280 with any questions you may have.

Sincerely,

Nancy Herter

Nancy Herter
Scientist, Archaeology

cc. Janet Zuckerman, OPRHP *(via email only)*
Julian Adams, OPRHP *(via email only)*
Lana Watt, SNI THPO *(via email only)*
Andrew Krievs, Hartgen Archaeological Associates *(via email only)*

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
REGION FOUR
1530 JEFFERSON ROAD
ROCHESTER, NEW YORK 14623-3161
www.nysdot.gov

ROBERT A. TRAVER, P.E.
ACTING REGIONAL DIRECTOR

JOAN MCDONALD
COMMISSIONER

August 8, 2012

Ms. Ruth Pierpont, Acting Deputy Commissioner of Historic Preservation
NYS Office of Parks, Recreation
and Historic Preservation
P.O. Box 189 – Peebles Island
Waterford, NY 12188

RE:Portageville Bridge Replacement Project
Addendum Phase 1B Archaeological
Investigation Report & Avoidance Plan for the
Cascade House Historic Site
Town of Portage, Livingston County
Town of Genesee Falls, Wyoming County
08PR04896

Dear Ms. Pierpont:

Enclosed is a Phase 1B Archaeological Investigation Cultural Resource Survey Report (CRSR) for the expanded Area of Potential effect. Based on our review of the CRSR, we concur with the report's findings and recommendations. Also enclosed is the Avoidance Plan for the Cascade House Historic Site prepared for the above referenced project.

No response is necessary if the State Historic Preservation Office is in agreement with the eligibility recommendations in the CRSR. Comments, including any requests for additional information, may be provided in writing within 45 days of the receipt of this letter. If there is no response within 45 days, we will assume concurrence with these recommendations.

Please contact me at (585)272-4833 or christopher.caraccilo@dot.ny.gov with any questions or comments. We look forward to consulting with your office as the project progresses.

Sincerely,

Chris Caraccilo

Christopher P. Caraccilo
Regional Cultural Resources Coordinator, Region 4

Enclosures: CRSR Phase IB; Avoidance Plan

cc: Joe Krupitza, NYSDOT Rail Bureau
M. Santangelo, Office of Environment, POD 4-1

NEW YORK STATE
DEPARTMENT OF TRANSPORTATION
REGION 4 DESIGN

1530 Jefferson Road
Rochester, New York 14623-3161

Ph. (585) 272-3360 Fax. (585) 272-7547

LETTER OF TRANSMITTAL

August 8, 2012

THPO # 11-3592

Subject: Portageville Bridge ReplacementProject
Town of Genesee Falls, Wyoming County, Town of Portage, Livingston County

To: Ms. Lana Watt
Seneca Nation THPO
90 O:hi'yoh Way
Salamanca, NY 14779

Phone: (716) 945-1790 x3589
Fax:

From: Chris Caraccilo
Cultural Resources Coordinator

Phone: (585)-272-4833
Fax: (585) 272-7547

We Are Sending You the Following:

- [ ] Preliminary Drawings
- [ ] Draft Letter/Memo
- [ ] Utility Information
- [ ] Final Prints
- [ ] Specifications/Estimates
- [X] Cultural Resources Survey Report
- [ ] Copy of Letter/Memo

Copies	Dwg. No.	Date	Description
1		6/20/12	Phase IB Archaeological Investigation Report
			Portageville Bridge Replacement Project
1		7/23/12	Cascade House Historic Site Avoidance Plan

These are Transmitted (as checked below):

- [X] For your use
- [ ] For approval
- [ ] For review and comment (Return by _____)
- [ ] Comments as noted (Correct and return by _____)
- [X] Call if you have any questions
- [ ] As requested
- [X] For your information
- [ ] Reply requested
- [ ] Call upon receipt

Additional Instructions/Remarks:

Copy To:
- [X] G. Peter Jemison
- [X] File
- [ ] _____

Signed: Chris Caraccilo

NEW YORK STATE
DEPEARTMENT OF TRANSPORTATION
REGION 4 DESIGN

1530 Jefferson Road
Rochester, New York 14623-3161

Ph. (585) 272-3360 Fax: (585) 272-7547

LETTER OF TRANSMITTAL

August 22, 2012

Subject: Portageville Bridge ReplacementProject
Town of Genesee Falls, Wyoming County, Town of Portage, Livingston County

To: Christine Abrams/Chief Darwin Hill
Tonawanda Seneca Nation Office
7027 Meadville Road
Basom, NY 14013

Phone: **(716) 542-4244**
Fax: **(716) 542-4244**

From: Chris Caraccilo
Cultural Resources Coordinator

Phone: 585-272-4833
Fax: (585) 272-7547

We Are Sending You the Following:

- [ ] Preliminary Drawings
- [ ] Draft Letter/Memo
- [ ] Utility Information
- [ ] Final Prints
- [ ] Specifications/Estimates
- [X] Cultural Resource Survey Report
- [ ] Other

Copies	Dwg. No.	Date	Description
1		6/20/12	Phase IB Archaeological Investigation **Report**
			Portageville Bridge Replacement **Project**
1		7/23/12	Cascade House Historic Site Avoidance Plan

These are Transmitted (as checked below):

- [X] For your use
- [ ] For approval
- [ ] For review and comment (Return by _____)
- [ ] Comments as noted (Correct and return by _____)
- [X] Call if you have any questions
- [ ] As requested
- [X] For your information
- [ ] Reply requested
- [ ] Call upon receipt

Additional Instructions/Remarks:

Copy To:
- [X] File
- [ ] _____
- [ ] _____

Signed: Chris Caraccilo

Andrew M. Cuomo
Governor

Rose Harvey
Commissioner

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
518-237-8643
www.nysparks.com

September 4, 2012

Mr. Christopher P. Caraccilo
NYS DOT Region 4
1530 Jefferson Road
Rochester, New York 14623-3161

RE: DOT **(PIN 4935.79.301)**
Portageville Bridge Replacement Project: Addendum Phase 1B Archaeological Investigation Report & Avoidance Plan for the Cascade House Historic Site, Town of Portage, Livingston County; Town of Genesee Falls, Wyoming County
08PR04896

Dear Mr. Caraccilo:

Thank you for requesting the comments of the Office of the State Historic Preservation Officer (SHPO). We have reviewed the submitted report *Portageville Bridge Replacement Project: Addendum Phase 1B Archaeological Investigation Report & Avoidance Plan for the Cascade House Historic Site, Town of Portage, Livingston County; Town of Genesee Falls, Wyoming County* completed by Hartgen Archaeological Associates, Inc. and received by our office August 10, 2012. 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).

Results of the Phase 1B archaeological investigations indicate that a total of 36 shovel test pits were excavated within the project impact area. Two precontact lithic flakes were identified. Based upon the contexts from which they were recovered, it is likely that these flakes were found in disturbed contexts, and therefore not indicative of National Register-eligible properties. Additional impacts to the western side of the railroad easement will occur primarily in areas of prior disturbance and on slopes greater than 15% grade. Three shovel tests were excavated in this area. No cultural materials were recovered. No further archaeological investigation was recommended.

Based upon the provided information, our office concurs with the submitted findings for the proposed project. Furthermore, we concur with the proposed *Avoidance Plan for the Cascade House Historic Site* as provided by the Northfolk Southern Corporation. Should you have any questions, please feel free to contact me directly at (518) 237-8643, Extension 3288 or via electronic mail at Brian.Yates@parks.ny.us. If further correspondence is required regarding this project, please be sure to refer to the OPRHP Project Review (PR) number noted above.

Sincerely,

Wm. Brian Yates
Historic Preservation Specialist

cc: Joseph Krupitza, NYSDOT Freight & Passenger Rail Bureau (*email only*)
Mary Santangelo, NYSDOT Office of the Environment, Albany (*email only*)

U.S. Department of Transportation
Federal Highway Administration

New York Division

Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207
518-431-4127
Fax: 518-431-4121
New York.FHWA@dot.gov

November 14, 2013

In Reply Refer To:
HDO-NY

Mr. Jamie Fosburgh
U.S. Department of Interior
National Park Service
15 State Street
Boston, MA 02109

Subject: PIN 4935.79 – Invitation to become a Section 106 Consulting Party
Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County

Dear Mr. Fosburgh:

A Draft Environmental Impact Statement (Draft EIS) was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013 with a public hearing held in January 2013. However, after receiving federal funding from the Federal Highway Administration's (FHWA's) Congestion Mitigation and Air Quality Improvement (CMAQ) Program, the environmental review process is being adjusted to also satisfy federal review requirements. As such, a new Draft EIS will be published in accordance with the National Environmental Policy Act (NEPA) and the project will undergo review pursuant to Section 106 of the NHPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments. The new Draft EIS will address comments received during previous agency and public review, as appropriate.

Given your status as a consulting party under SEQR, this letter invites you to participate as a consulting party for review of the Portageville Bridge Project pursuant to Section 106 of the National Historic Preservation Act (NHPA; 36 CFR § 800).

The Portageville Bridge—spanning the Genesee River in Letchworth State Park between Wyoming County and Livingston County in Western New York—currently serves freight rail operated by Norfolk Southern Railway Company (Norfolk Southern) and is a vital, yet deficient, component of the Southern Tier route. The bridge was constructed in 1875 and is nearing the end of its useful life as a freight rail structure. Due to structural deficiencies, Norfolk Southern must impose substantial tonnage and speed restrictions on the bridge. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

As the federal lead agency, FHWA published a Notice of Intent to prepare an EIS for the Portageville Bridge Project in the *Federal Register*. As described in the Notice of Intent, FHWA, along with the New York State Department of Transportation (NYSDOT), acting as the New York State lead agency, are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. The Portageville Bridge EIS will serve as the basis for FHWA's Record of Decision under NEPA (NEPA; 42 USC §4321 et seq.) and

will also comply with requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and other applicable federal laws, rules, and regulations.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

For additional information, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a consulting party, please contact Michael Kowalczyk at 518-431-8892 or Michael.Kowalczyk@dot.gov by **December 19, 2013**. If you have any questions or would like to request any further information, please feel free to contact Mike.

Sincerely,

Robert M. Davies
District Engineer

cc: R. Hessinger, Director, Freight & Passenger Rail Bureau, NYSDOT

U.S. Department of Transportation
Federal Highway Administration

New York Division

Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207
518-431-4127
Fax: 518-431-4121
New York.FHWA@dot.gov

November 14, 2013

In Reply Refer To:
HDO-NY

Ms. Lauren Waldinger
Seneca Nation of Indians
90 Ohi:yo' Way
Salamanca, NY 14779

Subject: PIN 4935.79 – Invitation to become a Section 106 Consulting Party
Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County

Dear Ms. Waldinger:

A Draft Environmental Impact Statement (Draft EIS) was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013 with a public hearing held in January 2013. However, after receiving federal funding from the Federal Highway Administration's (FHWA's) Congestion Mitigation and Air Quality Improvement (CMAQ) Program, the environmental review process is being adjusted to also satisfy federal review requirements. As such, a new Draft EIS will be published in accordance with the National Environmental Policy Act (NEPA) and the project will undergo review pursuant to Section 106 of the NHPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments. The new Draft EIS will address comments received during previous agency and public review, as appropriate.

Given your status as a consulting party under SEQR, this letter invites you to participate as a consulting party for review of the Portageville Bridge Project pursuant to Section 106 of the National Historic Preservation Act (NHPA; 36 CFR § 800).

The Portageville Bridge—spanning the Genesee River in Letchworth State Park between Wyoming County and Livingston County in Western New York—currently serves freight rail operated by Norfolk Southern Railway Company (Norfolk Southern) and is a vital, yet deficient, component of the Southern Tier route. The bridge was constructed in 1875 and is nearing the end of its useful life as a freight rail structure. Due to structural deficiencies, Norfolk Southern must impose substantial tonnage and speed restrictions on the bridge. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

As the federal lead agency, FHWA published a Notice of Intent to prepare an EIS for the Portageville Bridge Project in the *Federal Register*. As described in the Notice of Intent, FHWA, along with the New York State Department of Transportation (NYSDOT), acting as the New York State lead agency, are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. The Portageville Bridge EIS will serve as the basis for FHWA's Record of Decision under NEPA (NEPA; 42 USC §4321 et seq.) and

will also comply with requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and other applicable federal laws, rules, and regulations.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

For additional information, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a consulting party, please contact Michael Kowalczyk at 518-431-8892 or Michael.Kowalczyk@dot.gov by **December 19, 2013**. If you have any questions or would like to request any further information, please feel free to contact Mike.

Sincerely,

Robert M. Davies
District Engineer

cc: R. Hessinger, Director, Freight & Passenger Rail Bureau, NYSDOT

U.S. Department of Transportation
Federal Highway Administration

New York Division

Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207
518-431-4127
Fax: 518-431-4121
New York.FHWA@dot.gov

November 14, 2013

In Reply Refer To:
HDO-NY

Mr. Darwin Hill
Tonawanda Seneca Nation
7027 Meadville Road
Basom, NY 14013

Subject: PIN 4935.79 – Invitation to become a Section 106 Consulting Party
Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County

Dear Mr. Hill:

A Draft Environmental Impact Statement (Draft EIS) was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013 with a public hearing held in January 2013. However, after receiving federal funding from the Federal Highway Administration's (FHWA's) Congestion Mitigation and Air Quality Improvement (CMAQ) Program, the environmental review process is being adjusted to also satisfy federal review requirements. As such, a new Draft EIS will be published in accordance with the National Environmental Policy Act (NEPA) and the project will undergo review pursuant to Section 106 of the NHPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments. The new Draft EIS will address comments received during previous agency and public review, as appropriate.

Given your status as a consulting party under SEQR, this letter invites you to participate as a consulting party for review of the Portageville Bridge Project pursuant to Section 106 of the National Historic Preservation Act (NHPA; 36 CFR § 800).

The Portageville Bridge—spanning the Genesee River in Letchworth State Park between Wyoming County and Livingston County in Western New York—currently serves freight rail operated by Norfolk Southern Railway Company (Norfolk Southern) and is a vital, yet deficient, component of the Southern Tier route. The bridge was constructed in 1875 and is nearing the end of its useful life as a freight rail structure. Due to structural deficiencies, Norfolk Southern must impose substantial tonnage and speed restrictions on the bridge. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

As the federal lead agency, FHWA published a Notice of Intent to prepare an EIS for the Portageville Bridge Project in the *Federal Register*. As described in the Notice of Intent, FHWA, along with the New York State Department of Transportation (NYSDOT), acting as the New York State lead agency, are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. The Portageville Bridge EIS will serve as the basis for FHWA's Record of Decision under NEPA (NEPA; 42 USC §4321 et seq.) and

will also comply with requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and other applicable federal laws, rules, and regulations.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

For additional information, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a consulting party, please contact Michael Kowalczyk at 518-431-8892 or Michael.Kowalczyk@dot.gov by **December 19, 2013**. If you have any questions or would like to request any further information, please feel free to contact Mike.

Sincerely,

Robert M. Davies
District Engineer

cc: R. Hessinger, Director, Freight & Passenger Rail Bureau, NYSDOT

U.S. Department of Transportation
Federal Highway Administration

New York Division

Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207
518-431-4127
Fax: 518-431-4121
New York.FHWA@dot.gov

November 14, 2013

In Reply Refer To:
HDO-NY

Mr. Neil Patterson, Jr.
Tuscarora Nation
1967 Upper Mountain Road
Lewiston, NY 14092

Subject: PIN 4935.79 – Invitation to become a Section 106 Consulting Party
Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County

Dear Mr. Patterson:

A Draft Environmental Impact Statement (Draft EIS) was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013 with a public hearing held in January 2013. However, after receiving federal funding from the Federal Highway Administration's (FHWA's) Congestion Mitigation and Air Quality Improvement (CMAQ) Program, the environmental review process is being adjusted to also satisfy federal review requirements. As such, a new Draft EIS will be published in accordance with the National Environmental Policy Act (NEPA) and the project will undergo review pursuant to Section 106 of the NHPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments. The new Draft EIS will address comments received during previous agency and public review, as appropriate.

Given your status as a consulting party under SEQR, this letter invites you to participate as a consulting party for review of the Portageville Bridge Project pursuant to Section 106 of the National Historic Preservation Act (NHPA; 36 CFR § 800).

The Portageville Bridge—spanning the Genesee River in Letchworth State Park between Wyoming County and Livingston County in Western New York—currently serves freight rail operated by Norfolk Southern Railway Company (Norfolk Southern) and is a vital, yet deficient, component of the Southern Tier route. The bridge was constructed in 1875 and is nearing the end of its useful life as a freight rail structure. Due to structural deficiencies, Norfolk Southern must impose substantial tonnage and speed restrictions on the bridge. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

As the federal lead agency, FHWA published a Notice of Intent to prepare an EIS for the Portageville Bridge Project in the *Federal Register*. As described in the Notice of Intent, FHWA, along with the New York State Department of Transportation (NYSDOT), acting as the New York State lead agency, are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. The Portageville Bridge EIS will serve as the basis for FHWA's Record of Decision under NEPA (NEPA; 42 USC §4321 et seq.) and

will also comply with requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and other applicable federal laws, rules, and regulations.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

For additional information, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a consulting party, please contact Michael Kowalczyk at 518-431-8892 or Michael.Kowalczyk@dot.gov by **December 19, 2013**. If you have any questions or would like to request any further information, please feel free to contact Mike.

Sincerely,

Robert M. Davies
District Engineer

cc: R. Hessinger, Director, Freight & Passenger Rail Bureau, NYSDOT

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Mr. Nathan Holth
Webmaster, HistoricBridges.org
5371 Walker Road
North Street, MI 48049

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Mr. Holth:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Ms. Sally Walker
Executive Director
Genesee Valley Conservancy
1 Main Street
Geneseo, NY 14454

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Ms. Walker:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013.**

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Ms. Tania Werbizky
Regional Director, Technical and Grant Programs
Preservation League of New York State
202 The Commons, Suite 302
Ithaca, NY 14850

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Ms. Werbizky:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Mr. Ronald Ballinger, President
Castile Historical Society & Museum
17 Park Road East
Castile, NY 14427

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Mr. Ballinger:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Ms. Doris A. Bannister, Historian
Wyoming County Historical Office
26 Linwood Avenue
Warsaw, NY 14569

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Ms. Bannister:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Mr. Thomas Yots
Director, Preservation Buffalo Niagara
Suite M108, 617 Main Street
Buffalo, NY 14203

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Mr. Yots:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties.* The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Mr. Joseph Koscis
Western New York Railway Historical Society
201 Siegfried Drive
Amherst, NY 14222-4457

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Mr. Koscis:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Mr. William Brummett
President
Livingston County Historical Society
30 Center Street
Geneseo, NY 14454

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Mr. Brummett:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Mr. Edward Holmes, President
Friends of the Genesee Valley Greenway
PO Box 42
Mt. Morris, NY 14510

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Mr. Holmes:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Ms. Joanne Arany
Executive Director
Landmark Society of Western New York
133 South Fitzhugh Street
Rochester, NY 14608-2204

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Ms. Arany:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

November 15, 2013

Ms. Carol Rathbun, President
Friends of Letchworth
1 Letchworth State Park
Castile, NY 14427

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Invitation to Apply for Section 106 Consulting Party Status

Dear Ms. Rathbun:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), invites you to apply for Consulting Party status for the Portageville Bridge Project (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

The Portageville Bridge—spanning the Genesee River between Wyoming County and Livingston County in Western New York—is a contributing resource within Letchworth State Park, a historic property listed in the National Register of Historic Places. The bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

Section 106 of the NHPA establishes a consultation process to consider the effects of Federal undertakings on historic properties, and to seek ways to avoid, minimize, or mitigate adverse effects on any such properties. The process involves consultation among the federal agency, the State Historic Preservation Office (SHPO), federally-recognized Indian tribes, and individuals and organizations with a demonstrated interest in the project, or a legal or economic relation to the project or affected properties.

For additional information on the Section 106 process, please see "Protecting Historic Properties: A Citizen's Guide to Section 106 Review," Advisory Council on Historic Preservation: http://www.achp.gov/docs/CitizenGuide.pdf.

If you are interested in participating as a Consulting Party, please return the enclosed form by fax, e-mail, or mail to:

Raymond Hessinger, P.E., Project Director
New York State Department of Transportation
50 Wolf Road, Albany, New York 12232
Fax: 518-457-3183
E-mail: PortagevilleBridge@dot.ny.gov

Please return your form by **December 19, 2013**.

Participation as a consulting party is subject to approval by FHWA. If selected, additional information about the Section 106 process will be provided along with notification of your approval. Consulting Party status would entitle you to receive and review pertinent information, to share your views, and to consider possible measures to avoid, minimize or mitigate adverse effects on historic properties together with other participants in the process.

If you have any questions, please contact me at 518-457-8075. Thank you for your interest in the Portageville Bridge Project.

Sincerely,

Raymond Hessinger, P.E.
Project Director

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Daniel P. Hitt, NYSDOT Main Office

U.S. Department of Transportation
Federal Highway Administration

New York Division

Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207
518-431-4127
Fax: 518-431-4121
New York.FHWA@dot.gov

November 18, 2013

In Reply Refer To:

Chief Leo R. Henry
Tuscarora Nation
2006 Mt. Hope Road
Via Lewiston, NY 14092

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County,
Section 106 Consultation

Dear Chief Henry:

The Federal Highway Administration (FHWA), in coordination with the New York State Department of Transportation (NYSDOT), would like to initiate consultation with the Tuscarora Nation for the proposed *Portageville Bridge Project* (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

Enclosed for your information, please find a map showing the project location in Letchworth State Park, Wyoming and Livingston Counties, New York, a location within the geographical area of interest of the Tuscarora Nation for the purpose of Section 106 consultation.
The Portageville Bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January

2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

We invite you to meet with FHWA and NYSDOT representatives to discuss and consider your views about the project and its potential to affect properties of religious and cultural significance to the Tuscarora Nation. NYSDOT staff will contact you shortly to confirm a date and time, based on your availability.

On behalf of FHWA and NYSDOT, we look forward to your participation in Section 106 consultation for the Portageville Bridge project. If you have any questions, please feel free to contact Mr. Michael Kowalczyk, FHWA Area Engineer, at 518-431-8892.

Sincerely,

Robert M. Davies
District Engineer

Enclosure: Project Location Map

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Raymond Hessinger, P.E., NYSDOT Main Office
Daniel P. Hitt, NYSDOT Main Office

U.S. Department of Transportation
Federal Highway Administration

New York Division

Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207
518-431-4127
Fax: 518-431-4121
New York.FHWA@dot.gov

November 18, 2013

In Reply Refer To:

Ms. Melissa Bach
Tribal Historic Preservation Officer (THPO)
Seneca Nation of Indians
90 O:hi'yoh Way
Salamanca, NY 14779

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Section 106 Consultation

Dear Ms. Bach:

The Federal Highway Administration (FHWA), in coordination with the New York State Department of Transportation (NYSDOT), would like to initiate consultation with the Seneca Nation of Indians for the proposed *Portageville Bridge Project* (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

Enclosed for your information, please find a map showing the project location in Letchworth State Park, Wyoming and Livingston Counties, New York, a location within the geographical area of interest of the Seneca Nation for the purpose of Section 106 consultation.
The Portageville Bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency

review from November 26, 2012 through February 1, 2013, with a public hearing held in January 2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

We invite you to meet with FHWA and NYSDOT representatives to discuss and consider your views about the project and its potential to affect properties of religious and cultural significance to the Seneca Nation. NYSDOT staff will contact you shortly to confirm a date and time, based on your availability.

On behalf of FHWA and NYSDOT, we look forward to your participation in Section 106 consultation for the Portageville Bridge project. If you have any questions, please feel free to contact Mr. Michael Kowalczyk, FHWA Area Engineer, at 518-431-8892.

Sincerely,

Robert M. Davies
District Engineer

Enclosure: Project Location Map

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Raymond Hessinger, P.E., NYSDOT Main Office
Daniel P. Hitt, NYSDOT Main Office

U.S. Department of Transportation
Federal Highway Administration

New York Division

Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207
518-431-4127
Fax: 518-431-4121
New York.FHWA@dot.gov

November 18, 2013

In Reply Refer To:

Chief Leo R. Henry
Tuscarora Nation
2006 Mt. Hope Road
Via Lewiston, NY 14092

Subject: PIN 4935.79 – Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming County,
Section 106 Consultation

Dear Chief Henry:

The Federal Highway Administration (FHWA), in coordination with the New York State Department of Transportation (NYSDOT), would like to initiate consultation with the Tuscarora Nation for the proposed *Portageville Bridge Project* (Project), an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulation, 36 CFR Part 800 – *Protection of Historic Properties*. The Section 106 process is being carried out in coordination with other environmental reviews, including an Environmental Impact Statement (EIS) being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969.

Enclosed for your information, please find a map showing the project location in Letchworth State Park, Wyoming and Livingston Counties, New York, a location within the geographical area of interest of the Tuscarora Nation for the purpose of Section 106 consultation.
The Portageville Bridge currently serves freight rail operated by the Norfolk Southern Railway Company (Norfolk Southern) and is a vital component of the Southern Tier route. Built in 1875, the Portageville Bridge is nearing the end of its useful life as a freight rail structure. The purpose of the project is to provide a modern rail crossing capable of carrying current industry standard freight rail loads, to the greatest degree possible, meeting Federal Railroad Administration (FRA) Class 4 speeds, while reducing ongoing maintenance efforts and costs. The project is needed in order to continue safe, reliable and efficient rail operations on the Southern Tier route, which are critical to the economic viability and growth of the Southern Tier and other affected areas of New York.

The FHWA and NYSDOT are preparing an EIS that will identify alternatives for an improved Genesee River railroad crossing and document the potential environmental consequences of these alternatives. As you may be aware, a Draft EIS was prepared for the project under the New York State Environmental Quality Review Act (SEQRA) and underwent public and agency review from November 26, 2012 through February 1, 2013, with a public hearing held in January

2013. As a result of federal funding from FHWA, the environmental review process is being adjusted to also satisfy federal review requirements, including Section 106 of the NHPA and a new Draft EIS in accordance with NEPA. The project has not been substantially altered since publication of the SEQRA EIS, but has been refined based on public and agency comments.

For additional information on the project and the environmental review process, please see the project website at https://www.dot.ny.gov/portagevillebridge.

We invite you to meet with FHWA and NYSDOT representatives to discuss and consider your views about the project and its potential to affect properties of religious and cultural significance to the Tuscarora Nation. NYSDOT staff will contact you shortly to confirm a date and time, based on your availability.

On behalf of FHWA and NYSDOT, we look forward to your participation in Section 106 consultation for the Portageville Bridge project. If you have any questions, please feel free to contact Mr. Michael Kowalczyk, FHWA Area Engineer, at 518-431-8892.

Sincerely,

Robert M. Davies
District Engineer

Enclosure: Project Location Map

cc: John Bonafide, NYS OPRHP / SHPO
Kelly Yasaitis Fanizzo, ACHP
Michael Kowalczyk, FHWA
Kevin C. Bush, P.E., NYSDOT Region 4
Raymond Hessinger, P.E., NYSDOT Main Office
Daniel P. Hitt, NYSDOT Main Office

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
REGION FOUR
1530 JEFFERSON ROAD
ROCHESTER, NEW YORK 14623-3161
www.dot.ny.gov

ROBERT A. TRAVER, P.E.
ACTING REGIONAL DIRECTOR

JOAN MCDONALD
COMMISSIONER

January 7, 2014

Michael S. Kowalczyk, P.E.
Area Engineer-Region 6
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Ave, Suite 719
Albany, NY 12207

RE: Portageville Bridge Project
PIN 4935.79.101 / 08PR04896
Towns of Portage and Genesee Falls, Livingston and Wyoming County
REQUEST FOR APPROVAL OF SECTION 106 CONSULTING PARTY STATUS

Dear Mr. Kowalczyk:

Please find enclosed for consideration by the Federal Highway Administration (FHWA), requests for Section 106 Consulting Party status for the *Portageville Bridge Project*, submitted to the New York State Department of Transportation (NYSDOT) in accordance with 36 CFR Part 800.2(c)(5):

> *Certain individuals and organizations with a demonstrated interest in the undertaking may Participate as consulting parties due to the nature of their legal or economic relation to the Undertaking or affected properties, or their concern with the undertaking's effect on historic properties.*

On November 15, 2013, NYSDOT reached out to selected individuals and organizations, inviting them to apply for Consulting Party status based on a Regional interest in historic preservation or a previous expression of interest in the Project. In addition, a Public Scoping meeting held in Mt. Morris, New York on November 19, 2013, informed the public of the opportunity to participate in the Section 106 consultation process. The enclosures received in response to these efforts include copies of all written requests received by NYSDOT as formal letters, forms, or e-mails as well as a comprehensive list prepared by NYSDOT in a table format for your convenience.

The New York State Department of Transportation (NYSDOT) has reviewed the enclosed requests and recommends the following individuals and organizations for Consulting Party status, based on their written statements of interest. We also recommend treating the NYS Parks Office as a Consulting Party due to its jurisdiction over Letchworth State Park, a National Register listed property subject to consideration through the Section 106 review process.

1. Landmark Society of Western New York
2. Friends of the Genesee Valley Greenway
3. Historic Bridges.org
4. Seneca Nation of Indians
5. Tonawanda Seneca Nation
6. Tuscarora Nation
7. NYS Office of Parks, Recreation and Historic Preservation-State Parks

The Seneca Nation of Indians, the Tonawanda Seneca Nation and the Tuscarora Nation have been identified as having a consultative role in accordance with 36 CFR Part 800.2(c)(ii), since all three have previously identified a geographical area of interest for Section 106 consultation that includes Livingston and Wyoming Counties.

We respectfully request FHWA approval of the above-referenced organizations, granting Consulting Party status for participation in the Section 06 process.

If you have any questions, please free to contact me at: Christopher.caraccilo@dot.ny.gov.

Sincerely,

Christopher Caraccilo
Cultural Resource Coordinator
NYSDOT Region 4

Enclosures

Cc: Robert Davies, FHWA
Julian Adams, OPRHP/SHPO
Ray Hessinger, NYSDOT
Dan Hitt, NYSDOT
Mary Santangelo, NYDOT
Chris Calvert, AKRF
file

LIST OF CONSULTING PARTY REQUESTS

NAME	ADDRESS	PHONE/EMAIL	RECOMMENDED	REQUEST
Landmark Society of Western New York Ms. Caitlin Meives, Preservation planner	133 S. Fitzhugh Street Rochester, NY 14608	Phone: (585)-546-7029 ext. 27 Fax: (585)-546-4788 cmeives@landmarksociety.org	Yes	Form 11/26/13
Friends of the Genesee Valley Greenway Edward Holmes Joan Schumaker	Box 42 Mt. Morris, NY 14510	Phone:(585)-658-2569 fogvg@frontiernet.net	Yes	Form 12/11/13
HistoricBridges.Org Nathan Holth	12534 Houghton Drive DeWitt, MI 48820	Phone: (269)-290-2593 nathan@historicbridges.org	Yes	Form 12/11/13
Seneca Nation of Indians Melissa Bach Tribal Historic Preservation Officer (THPO) Jay Toth, Tribal Archaeologist	90 O:hi'yoh Way Salamanca, NY 14779	Phone: (716) 945-1790, ext. 3580 Emergency: (716) 244-1735 Melissa.bach@sni.org Jay.toth@sni.org	Yes	Email 11/21/13
Tonawanda Seneca Nation Chief Darwin Hill	Tonawanda Seneca Nation Office 7027 Meadville Road Basom, New York 14013	Phone: (716)-542-4244 Fax:(716)- 542-4008 tonseneca@aol.com	Yes	---
Tuscarora Nation Chief Leo R. Henry	2006 Mt. Hope Road Via Lewiston, NY 14092	Phone:(716)-622-7061 Fax: (716)-297-7355	Yes	---
NYS Office of Park, Recreation and Historic Preservation-State Parks Dave Herring, Capital Facilities Manager	One Letchworth State Park Castile, NY 14427	Phone 585-493-3602 Mobile 585-322-5671 Fax 585-493-5272 David.herring@parks.ny.gov	Yes	---

U.S. Department of Transportation
Federal Highway Administration

New York Division

Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207
518-431-4127
Fax: 518-431-4121
New York.FHWA@dot.gov

January 17, 2014

In Reply Refer To:
HED-NY

Christopher Caraccilo
Regional Cultural Resource Coordinator
New York State Department of Transportation, Region 4
1530 Jefferson Road
Rochester, NY 14623

Subject: PIN 4935.79 – Portageville Bridge Project
Approval of Section 106 Consulting Party Status
Towns of Portage and Genesee Falls, Livingston and Wyoming County

Dear Mr. Caraccilo:

We have reviewed your January 7 letter transmitting 7 requests for Section 106 consulting party status on the Portageville Bridge Project. As stated in 36 CFR Part 800.2(c)(5):

Certain individuals and organizations with a demonstrated interest in the undertaking may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties.

After reviewing the information contained in the individual requests and the additional information provided, we have approved the following organizations and individuals to be consulting parties to the Section 106 process for the subject project:

1. Ms. Caitlin Meives – Landmark Society of Western New York
2. Mr. Edward Holmes – Friends of the Genesee Valley Greenway
3. Mr. Nathan Holth – HistoricBridges.org
4. Mr. Dave Herring – NYS Office of Parks, Recreation, and Historic Preservation – State Parks
5. Ms. Melissa Bach – Seneca Nation of Indians
6. Chief Darwin Hill – Tonawanda Seneca Nation
7. Chief Leo R. Henry – Tuscarora Nation

Consulting party status entitles these individuals/organizations to share views, receive and review pertinent information, offer ideas, and consider possible solutions together with the Federal Highway Administration, NYSDOT, and other consulting parties. Please ensure the requestors have a copy of the Advisory Council on Historic Preservation's (ACHP) guide entitled "Protecting Historic Properties: A Citizen's Guide to Section 106 Review".

If you have any questions, please contact me at (518) 431-8892.

Sincerely,

Michael S. Kowalczyk
Area Engineer

cc:
Julian Adams, OPRHP/SHPO
Carol Legard, ACHP
Ray Hessinger, NYSDOT MO
Dan Hitt, NYSDOT MO
Mary Santangelo, NYSDOT MO

Claudia Cooney <ccooney@akrf.com>

Portageville Bridge project

1 message

Caraccilo, Christopher P (DOT) <Christopher.Caraccilo@dot.ny.gov> Thu, Feb 13, 2014 at 9:03 AM
To: "bprintup@hetf.org" <bprintup@hetf.org>
Cc: "michael.kowalczyk@dot.gov" <michael.kowalczyk@dot.gov>, "robert.davies@dot.gov" <robert.davies@dot.gov>, "Hessinger, Raymond (DOT)" <Raymond.Hessinger@dot.ny.gov>, "Santangelo, Mary (DOT)" <Mary.Santangelo@dot.ny.gov>, Claudia Cooney <ccooney@akrf.com>, Julie Cowing <jcowing@akrf.com>

Dear Mr. Printup,

The Federal Highway Administration, NYS Department of Transportation and Norfolk Southern Railway Company are currently undertaking a project to replace the Portageville Rail Bridge (Portageville Bridge) in Letchworth State Park.

We have been informed by FHWA of the point-of-contact change for the Tuscarora Nation. Attached for your reference is the Section 106 project initiation letter that was sent to Chief Leo Henry on November 18, 2013.

NYSDOT staff are currently completing Section 106 documentation and anticipate a consulting party meeting in March.

On behalf of FHWA and NYS DOT we look forward to your participation in Section 106 consultation for the Portageville Bridge Project.

Please email or call with any questions.

Thank you,

Chris

Christopher P. Caraccilo

Acting Regional Landscape Architect

Regional Cultural Resource Coordinator

NYS Department of Transportation-Region 4

1530 Jefferson Road

Rochester, NY 14623

585-272-4833

11.18.2013_ltr_FHWA_Tuscarora.pdf
999K

Appendix C: Historic and Cultural Resources

C-4 Correspondence Not Contained in Appendix F of the Section 106 Finding Documentation (March 2014 and Onward)

U.S. Department of Transportation
Federal Highway Administration

New York Division

Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207
518-431-4127
Fax: 518-431-4121
New York.FHWA@dot.gov

March 5, 2014

In Reply Refer To:
HED-NY

Ms. Charlene Dwin Vaughn, Assistant Director
Office of Federal Agency Programs
Advisory Council on Historic Preservation
The Old Post Office Building, Suite 809
1100 Pennsylvania Avenue, NW
Washington, DC 20004

Subject: PIN 4935.79 – Section 106 Consultation
Portageville Bridge Project
Towns of Portage and Genesee Falls, Livingston and Wyoming Counties

Dear Ms. Vaughn:

The preferred alternative for the subject project proposes to construct a new bridge on parallel alignment and remove the existing bridge. The proposed work associated with the replacement of the Portageville Bridge in the Towns of Portage and Genesee Falls involves the removal and demolition of the Portageville Bridge and alterations of other contributing resources within Letchworth State Park, a property that is listed in the National Register of Historic Places. In accordance with the provisions of 36 CFR 800.6, we advise you that in consultation with the New York State Historic Preservation Officer, we have determined that the subject project will have an *Adverse Effect*.

In accordance with article 800.6(a)(1), we are enclosing the documentation specified in article 800.11(e) which includes the letter from the New York State Historic Preservation Office's concurring with the *Adverse Effect* finding, the Finding Documentation, a preliminary draft of the Memorandum of Agreement (MOA), project location maps, and project location photos. Please notify us whether the Council will participate in consultation within 15 days.

If you have any questions, please feel free to contact me at (518) 431-8892.

Sincerely,

Michael S. Kowalczyk
Area Engineer

Enclosure 800.11(e) documentation

cc: J. Adams, OPRHP/SHPO, (08PR04896) (w/o enclosure)
C. Caraccilo, NYSDOT Region 4 (w/o enclosure)
D. Hitt, NYSDOT MO (w/o enclosure)
R. Hessinger, NYSDOT MO (w/o enclosure)
R. Nelson, Director, ACHP (w/o enclosure)

Andrew M. Cuomo
Governor

Rose Harvey
Commissioner

New York State Office of Parks, Recreation and Historic Preservation

Division for Historic Preservation
Peebles Island, PO Box 189, Waterford, New York 12188-0189
518-237-8643
www.nysparks.com

March 5, 2014

Christopher P. Caraccilo
Acting Regional Landscape Architect
Regional Cultural Resource Coordinator
NYS Department of Transportation-Region 4
1530 Jefferson Road
Rochester, NY 14623

Re: FHWA/NEPA/NYSDOT/OPRHP
:
Draft MOA
Portageville Bridge Project
Letchworth State Park
Livingston County

Dear Mr. Caraccilo:

Thank you for your forwarding the draft Memorandum of Agreement (MOA) concerning mitigation for the Portageville Bridge Project. The New York State Historic Preservation Office has reviewed the Finding Document in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966.

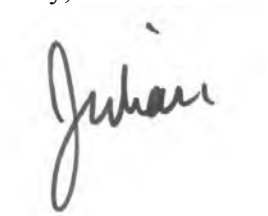
Overall the draft is excellent and covers the process, discussions, and general program and project understandings to date. I do have some comments that should be addressed in any future (final) copies of the MOA. These are:

1. **Page 3, top of page (continued from Page 2)**. Replace NPS with HAER (Historic American Engineering Record), as that is the organization that will be undertaking the recordation.
2. **Page 5, Letter B.** The language currently refers to "certain funding" but does not determine who this money will go to for execution of the recordation. While we understand that all mitigation funding will be addressed through a separate agreement(s), this item should be noted as a contract to be made between Norfolk Southern and HAER directly, reflecting the MOA's appropriate commitment to documentation. The NYSHPO will not serve as a "middleman"

3. **Page 6, Letter D, Construction Protection Plan.** After "NS shall", "in consultation with OPRHP"
4. **Signature Page(s), Page 8.** Remove Tom Alworth as a signatory.

Again, thank you for your submission. If anyone has any questions, or if I can be of any assistance, please call me at (518)-237-8643, ext. 3271.

Sincerely,



Julian W. Adams
Director, Bureau of Community Preservation Services

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
REGION FOUR
1530 JEFFERSON ROAD
ROCHESTER, NEW YORK 14623-3161
www.dot.ny.gov

ROBERT A. TRAVER, P.E.
ACTING REGIONAL DIRECTOR

JOAN MCDONALD
COMMISSIONER

March 6, 2014

Joan Schumaker
Friends of the Genesee Valley Greenway
Box 42
Mt. Morris, NY 14510

RE: Portageville Bridge Project
PIN 4935.79.101 / 08PR04896
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Section 106 Documentation Package and Consulting Party Meeting

Dear Joan Schumaker:

As an approved Consulting Party to the Section 106 process for the Portageville Bridge Project, you are cordially invited to participate in a Consulting Party meeting, scheduled for March 20, 2014 at 1:00 PM. The meeting will be held in the Genesee Conference Room, on the third floor on the New York State Department of Transportation (NYSDOT) Region 4 office building. A map and directions are attached. In addition we will have phone-in/WebEx conference capabilities for members that cannot attend in person. Representatives from both the Federal Highway Administration (FHWA) and NYSDOT are expected to participate.

Background on the Section 106 Process

An Environmental Impact Statement (EIS) being prepared for this Project in accordance with the National Environmental Policy Act (NEPA) considers a "New Bridge on Parallel Alignment/Remove Existing Bridge" as the Preferred Alternative. Based on the proposed funding and regulatory approvals initially anticipated for the Project, a Draft EIS (DEIS) was previously prepared pursuant to New York State's State Environmental Quality Review Act (SEQRA), with NYSDOT as the lead agency. The DEIS was published in November 2012, with a public review period held from November 26, 2012 through February 1, 2013 and a public hearing in January 2013. The Project's potential impacts on historic properties were assessed as part of the SEQRA DEIS in accordance with the New York State Historic Preservation Act (SHPA) of 1980, as set forth in Section 14.09 of the New York State Parks, Recreation and Historic Preservation Law. The documentation prepared in accordance with the Section 14.09 of the SHPA provides the basis for meeting obligations under Section 106, as both laws require similar procedures to identify historic properties and evaluate potential impacts.

In addition, substantial consultation was undertaken with the New York State Historic Preservation Office (SHPO), and outreach was also undertaken with Native American tribes and the public. Subsequent to that process, potential federal funding through the Congestion Mitigation and Air Quality Improvement (CMAQ) Program was identified. As a result, the Project is now subject to the Section 106 of the NHPA. The Section 106 review process is being progressed in accordance with its implementing regulations (36 CFR Part 800), and in coordination with the EIS. The analyses presented in the EIS anticipate an Estimated Time of Completion of December 31, 2017. Two alternatives will be evaluated in the EIS, the No Action/Maintenance Alternative and the Preferred Alternative.

For more information on the Project and schedule please visit the Project's website:

https://www.dot.ny.gov/portagevillebridge

Adverse Effect Finding and MOA

Applying the criteria of effects (36 CFR 800.5(a)(1)), FHWA in coordination with the NYSDOT, and in consultation with the SHPO, anticipates a finding of Adverse Effect for the Project, due to the proposed removal and demolition of the Portageville Bridge and alterations to other contributing resources in Letchworth State Park, a property listed in the National Register of Historic Places. The enclosed Section 106 Finding Documentation, prepared in accordance with the standards outlined in 36 CFR 800.11(e), provides project information and documents the evaluation of the Project's effects on historic properties.

The Section 106 process involves consultation to resolve adverse effects and to develop a Memorandum of Agreement (MOA) documenting actions that have been agreed upon to mitigate adverse effects. A Preliminary Draft MOA is being distributed at this time, for your review and input.

Consulting Party Meeting

The purpose of this meeting is to provide an opportunity for Section 106 Consulting Parties to offer their views and to participate in the resolution of adverse effects, including the development of mitigation measures. As part of the Section 106 consultation process, FHWA, in coordination with NYSDOT and in consultation with the NYS Historic Preservation Office (SHPO), will consider the views of Consulting Parties in seeking ways to mitigate adverse effects on historic properties.
In preparation for the Consulting Party meeting we encourage you to read the enclosed materials:

- FHWA letter – approved Consulting Party list (1-17-14)
- Section 106 Finding Documentation with Appendices A-F
- NYSDOT cover letter & request for SHPO concurrence with Adverse Effect (2-11-14)
- SHPO concurrence with Adverse Effect (2-20-14)
- *Preliminary Draft* Memorandum of Agreement with Appendices
- Meeting info (map and directions)

We request that you submit any written comments on the Draft MOA within a 30 day review period ending on April 8, 2014.

We would appreciate your response by the close of business on March 12, 2014, to let us know if you plan to attend the Consulting Party meeting in person or remotely. Please register by phone or email with myself at (585)-272-4833 or Christopher.caraccilo@dot.ny.gov.

Sincerely,

Chris Caraccilo

Christopher Caraccilo
Cultural Resource Coordinator
NYSDOT Region 4

Enclosures

cc: Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kelly Fanizzo, ACHP
Julian Adams, OPRHP/SHPO
Ray Hessinger, NYSDOT
Dan Hitt, NYSDOT

bcc: Mary Santangelo, NYSDOT
Catherine Leslie, NYSDOT
Julie Cowing, AKRF
Chris Calvert, AKRF
Claudia Cooney, AKRF

file

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
REGION FOUR
1530 JEFFERSON ROAD
ROCHESTER, NEW YORK 14623-3161
www.dot.ny.gov

ROBERT A. TRAVER, P.E.
ACTING REGIONAL DIRECTOR

JOAN MCDONALD
COMMISSIONER

March 6, 2014

Nathan Holth
Historic Bridges.org
12534 Houghton Drive
DeWitt, MI 48820

RE: Portageville Bridge Project
PIN 4935.79.101 / 08PR04896
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Section 106 Documentation Package and Consulting Party Meeting

Dear Nathan Holth:

As an approved Consulting Party to the Section 106 process for the Portageville Bridge Project, you are cordially invited to participate in a Consulting Party meeting, scheduled for March 20, 2014 at 1:00 PM. The meeting will be held in the Genesee Conference Room, on the third floor on the New York State Department of Transportation (NYSDOT) Region 4 office building. A map and directions are attached. In addition we will have phone-in/WebEx conference capabilities for members that cannot attend in person. Representatives from both the Federal Highway Administration (FHWA) and NYSDOT are expected to participate.

Background on the Section 106 Process

An Environmental Impact Statement (EIS) being prepared for this Project in accordance with the National Environmental Policy Act (NEPA) considers a "New Bridge on Parallel Alignment/Remove Existing Bridge" as the Preferred Alternative. Based on the proposed funding and regulatory approvals initially anticipated for the Project, a Draft EIS (DEIS) was previously prepared pursuant to New York State's State Environmental Quality Review Act (SEQRA), with NYSDOT as the lead agency. The DEIS was published in November 2012, with a public review period held from November 26, 2012 through February 1, 2013 and a public hearing in January 2013. The Project's potential impacts on historic properties were assessed as part of the SEQRA DEIS in accordance with the New York State Historic Preservation Act (SHPA) of 1980, as set forth in Section 14.09 of the New York State Parks, Recreation and Historic Preservation Law. The documentation prepared in accordance with the Section 14.09 of the SHPA provides the basis for meeting obligations under Section 106, as both laws require similar procedures to identify historic properties and evaluate potential impacts.

In addition, substantial consultation was undertaken with the New York State Historic Preservation Office (SHPO), and outreach was also undertaken with Native American tribes and the public. Subsequent to that process, potential federal funding through the Congestion Mitigation and Air Quality Improvement (CMAQ) Program was identified. As a result, the Project is now subject to the Section 106 of the NHPA. The Section 106 review process is being progressed in accordance with its implementing regulations (36 CFR Part 800), and in coordination with the EIS. The analyses presented in the EIS anticipate an Estimated Time of Completion of December 31, 2017. Two alternatives will be evaluated in the EIS, the No Action/Maintenance Alternative and the Preferred Alternative.

For more information on the Project and schedule please visit the Project's website:

https://www.dot.ny.gov/portagevillebridge

Adverse Effect Finding and MOA

Applying the criteria of effects (36 CFR 800.5(a)(1)), FHWA in coordination with the NYSDOT, and in consultation with the SHPO, anticipates a finding of Adverse Effect for the Project, due to the proposed removal and demolition of the Portageville Bridge and alterations to other contributing resources in Letchworth State Park, a property listed in the National Register of Historic Places. The enclosed Section 106 Finding Documentation, prepared in accordance with the standards outlined in 36 CFR 800.11(e), provides project information and documents the evaluation of the Project's effects on historic properties.

The Section 106 process involves consultation to resolve adverse effects and to develop a Memorandum of Agreement (MOA) documenting actions that have been agreed upon to mitigate adverse effects. A Preliminary Draft MOA is being distributed at this time, for your review and input.

Consulting Party Meeting

The purpose of this meeting is to provide an opportunity for Section 106 Consulting Parties to offer their views and to participate in the resolution of adverse effects, including the development of mitigation measures. As part of the Section 106 consultation process, FHWA, in coordination with NYSDOT and in consultation with the NYS Historic Preservation Office (SHPO), will consider the views of Consulting Parties in seeking ways to mitigate adverse effects on historic properties.
In preparation for the Consulting Party meeting we encourage you to read the enclosed materials:

- FHWA letter – approved Consulting Party list (1-17-14)
- Section 106 Finding Documentation with Appendices A-F
- NYSDOT cover letter & request for SHPO concurrence with Adverse Effect (2-11-14)
- SHPO concurrence with Adverse Effect (2-20-14)
- *Preliminary Draft* Memorandum of Agreement with Appendices
- Meeting info (map and directions)

We request that you submit any written comments on the Draft MOA within a 30 day review period ending on April 8, 2014.

We would appreciate your response by the close of business on March 12, 2014, to let us know if you plan to attend the Consulting Party meeting in person or remotely. Please register by phone or email with myself at (585)-272-4833 or Christopher.caraccilo@dot.ny.gov.

Sincerely,

Chris Caraccilo

Christopher Caraccilo
Cultural Resource Coordinator
NYSDOT Region 4

Enclosures

cc: Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kelly Fanizzo, ACHP
Julian Adams, OPRHP/SHPO
Ray Hessinger, NYSDOT
Dan Hitt, NYSDOT

bcc: Mary Santangelo, NYSDOT
Catherine Leslie, NYSDOT
Julie Cowing, AKRF
Chris Calvert, AKRF
Claudia Cooney, AKRF

file

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
REGION FOUR
1530 JEFFERSON ROAD
ROCHESTER, NEW YORK 14623-3161
www.dot.ny.gov

ROBERT A. TRAVER, P.E.
ACTING REGIONAL DIRECTOR

JOAN MCDONALD
COMMISSIONER

March 6, 2014

Ms. Caitlin Meives, Preservation Planner
Landmark Society of Western New York
133 S. Fitzhugh Street
Rochester, NY 14608

RE: Portageville Bridge Project
PIN 4935.79.101 / 08PR04896
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Section 106 Documentation Package and Consulting Party Meeting

Dear Caitlin Meives:

As an approved Consulting Party to the Section 106 process for the Portageville Bridge Project, you are cordially invited to participate in a Consulting Party meeting, scheduled for March 20, 2014 at 1:00 PM. The meeting will be held in the Genesee Conference Room, on the third floor on the New York State Department of Transportation (NYSDOT) Region 4 office building. A map and directions are attached. In addition we will have phone-in/WebEx conference capabilities for members that cannot attend in person. Representatives from both the Federal Highway Administration (FHWA) and NYSDOT are expected to participate.

Background on the Section 106 Process

An Environmental Impact Statement (EIS) being prepared for this Project in accordance with the National Environmental Policy Act (NEPA) considers a "New Bridge on Parallel Alignment/Remove Existing Bridge" as the Preferred Alternative. Based on the proposed funding and regulatory approvals initially anticipated for the Project, a Draft EIS (DEIS) was previously prepared pursuant to New York State's State Environmental Quality Review Act (SEQRA), with NYSDOT as the lead agency. The DEIS was published in November 2012, with a public review period held from November 26, 2012 through February 1, 2013 and a public hearing in January 2013. The Project's potential impacts on historic properties were assessed as part of the SEQRA DEIS in accordance with the New York State Historic Preservation Act (SHPA) of 1980, as set forth in Section 14.09 of the New York State Parks, Recreation and Historic Preservation Law. The documentation prepared in accordance with the Section 14.09 of the SHPA provides the basis for meeting obligations under Section 106, as both laws require similar procedures to identify historic properties and evaluate potential impacts.

In addition, substantial consultation was undertaken with the New York State Historic Preservation Office (SHPO), and outreach was also undertaken with Native American tribes and the public. Subsequent to that process, potential federal funding through the Congestion Mitigation and Air Quality Improvement (CMAQ) Program was identified. As a result, the Project is now subject to the Section 106 of the NHPA. The Section 106 review process is being progressed in accordance with its implementing regulations (36 CFR Part 800), and in coordination with the EIS. The analyses presented in the EIS anticipate an Estimated Time of Completion of December 31, 2017. Two alternatives will be evaluated in the EIS, the No Action/Maintenance Alternative and the Preferred Alternative.

For more information on the Project and schedule please visit the Project's website:

https://www.dot.ny.gov/portagevillebridge

Adverse Effect Finding and MOA

Applying the criteria of effects (36 CFR 800.5(a)(1)), FHWA in coordination with the NYSDOT, and in consultation with the SHPO, anticipates a finding of Adverse Effect for the Project, due to the proposed removal and demolition of the Portageville Bridge and alterations to other contributing resources in Letchworth State Park, a property listed in the National Register of Historic Places. The enclosed Section 106 Finding Documentation, prepared in accordance with the standards outlined in 36 CFR 800.11(e), provides project information and documents the evaluation of the Project's effects on historic properties.

The Section 106 process involves consultation to resolve adverse effects and to develop a Memorandum of Agreement (MOA) documenting actions that have been agreed upon to mitigate adverse effects. A Preliminary Draft MOA is being distributed at this time, for your review and input.

Consulting Party Meeting

The purpose of this meeting is to provide an opportunity for Section 106 Consulting Parties to offer their views and to participate in the resolution of adverse effects, including the development of mitigation measures. As part of the Section 106 consultation process, FHWA, in coordination with NYSDOT and in consultation with the NYS Historic Preservation Office (SHPO), will consider the views of Consulting Parties in seeking ways to mitigate adverse effects on historic properties.
In preparation for the Consulting Party meeting we encourage you to read the enclosed materials:

- FHWA letter – approved Consulting Party list (1-17-14)
- Section 106 Finding Documentation with Appendices A-F
- NYSDOT cover letter & request for SHPO concurrence with Adverse Effect (2-11-14)
- SHPO concurrence with Adverse Effect (2-20-14)
- *Preliminary Draft* Memorandum of Agreement with Appendices
- Meeting info (map and directions)

We request that you submit any written comments on the Draft MOA within a 30 day review period ending on April 8, 2014.

We would appreciate your response by the close of business on March 12, 2014, to let us know if you plan to attend the Consulting Party meeting in person or remotely. Please register by phone or email with myself at (585)-272-4833 or Christopher.caraccilo@dot.ny.gov.

Sincerely,

Chris Caraccilo

Christopher Caraccilo
Cultural Resource Coordinator
NYSDOT Region 4

Enclosures

cc: Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kelly Fanizzo, ACHP
Julian Adams, OPRHP/SHPO
Ray Hessinger, NYSDOT
Dan Hitt, NYSDOT

bcc: Mary Santangelo, NYSDOT
Catherine Leslie, NYSDOT
Julie Cowing, AKRF
Chris Calvert, AKRF
Claudia Cooney, AKRF

file

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
REGION FOUR
1530 JEFFERSON ROAD
ROCHESTER, NEW YORK 14623-3161
www.dot.ny.gov

ROBERT A. TRAVER, P.E.
ACTING REGIONAL DIRECTOR

JOAN MCDONALD
COMMISSIONER

March 6, 2014

Dave Herring, Capital Facilities Manager
NYS Office of Park, Recreation and Historic Preservation-State Parks
One Letchworth State Park
Castile, NY 14427

RE: Portageville Bridge Project
PIN 4935.79.101 / 08PR04896
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Section 106 Documentation Package and Consulting Party Meeting

Dear Dave Herring:

As an approved Consulting Party to the Section 106 process for the Portageville Bridge Project, you are cordially invited to participate in a Consulting Party meeting, scheduled for March 20, 2014 at 1:00 PM. The meeting will be held in the Genesee Conference Room, on the third floor on the New York State Department of Transportation (NYSDOT) Region 4 office building. A map and directions are attached. In addition we will have phone-in/WebEx conference capabilities for members that cannot attend in person. Representatives from both the Federal Highway Administration (FHWA) and NYSDOT are expected to participate.

Background on the Section 106 Process

An Environmental Impact Statement (EIS) being prepared for this Project in accordance with the National Environmental Policy Act (NEPA) considers a "New Bridge on Parallel Alignment/Remove Existing Bridge" as the Preferred Alternative. Based on the proposed funding and regulatory approvals initially anticipated for the Project, a Draft EIS (DEIS) was previously prepared pursuant to New York State's State Environmental Quality Review Act (SEQRA), with NYSDOT as the lead agency. The DEIS was published in November 2012, with a public review period held from November 26, 2012 through February 1, 2013 and a public hearing in January 2013. The Project's potential impacts on historic properties were assessed as part of the SEQRA DEIS in accordance with the New York State Historic Preservation Act (SHPA) of 1980, as set forth in Section 14.09 of the New York State Parks, Recreation and Historic Preservation Law. The documentation prepared in accordance with the Section 14.09 of the SHPA provides the basis for meeting obligations under Section 106, as both laws require similar procedures to identify historic properties and evaluate potential impacts.

In addition, substantial consultation was undertaken with the New York State Historic Preservation Office (SHPO), and outreach was also undertaken with Native American tribes and the public. Subsequent to that process, potential federal funding through the Congestion Mitigation and Air Quality Improvement (CMAQ) Program was identified. As a result, the Project is now subject to the Section 106 of the NHPA. The Section 106 review process is being progressed in accordance with its implementing regulations (36 CFR Part 800), and in coordination with the EIS. The analyses presented in the EIS anticipate an Estimated Time of Completion of December 31, 2017. Two alternatives will be evaluated in the EIS, the No Action/Maintenance Alternative and the Preferred Alternative.

For more information on the Project and schedule please visit the Project's website:

https://www.dot.ny.gov/portagevillebridge

Adverse Effect Finding and MOA

Applying the criteria of effects (36 CFR 800.5(a)(1)), FHWA in coordination with the NYSDOT, and in consultation with the SHPO, anticipates a finding of Adverse Effect for the Project, due to the proposed removal and demolition of the Portageville Bridge and alterations to other contributing resources in Letchworth State Park, a property listed in the National Register of Historic Places. The enclosed Section 106 Finding Documentation, prepared in accordance with the standards outlined in 36 CFR 800.11(e), provides project information and documents the evaluation of the Project's effects on historic properties.

The Section 106 process involves consultation to resolve adverse effects and to develop a Memorandum of Agreement (MOA) documenting actions that have been agreed upon to mitigate adverse effects. A Preliminary Draft MOA is being distributed at this time, for your review and input.

Consulting Party Meeting

The purpose of this meeting is to provide an opportunity for Section 106 Consulting Parties to offer their views and to participate in the resolution of adverse effects, including the development of mitigation measures. As part of the Section 106 consultation process, FHWA, in coordination with NYSDOT and in consultation with the NYS Historic Preservation Office (SHPO), will consider the views of Consulting Parties in seeking ways to mitigate adverse effects on historic properties.
In preparation for the Consulting Party meeting we encourage you to read the enclosed materials:

- FHWA letter – approved Consulting Party list (1-17-14)
- Section 106 Finding Documentation with Appendices A-F
- NYSDOT cover letter & request for SHPO concurrence with Adverse Effect (2-11-14)
- SHPO concurrence with Adverse Effect (2-20-14)
- *Preliminary Draft* Memorandum of Agreement with Appendices
- Meeting info (map and directions)

We request that you submit any written comments on the Draft MOA within a 30 day review period ending on April 8, 2014.

We would appreciate your response by the close of business on March 12, 2014, to let us know if you plan to attend the Consulting Party meeting in person or remotely. Please register by phone or email with myself at (585)-272-4833 or Christopher.caraccilo@dot.ny.gov.

Sincerely,

Chris Caraccilo

Christopher Caraccilo
Cultural Resource Coordinator
NYSDOT Region 4

Enclosures

cc: Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kelly Fanizzo, ACHP
Julian Adams, OPRHP/SHPO
Ray Hessinger, NYSDOT
Dan Hitt, NYSDOT

bcc: Mary Santangelo, NYSDOT
Catherine Leslie, NYSDOT
Julie Cowing, AKRF
Chris Calvert, AKRF
Claudia Cooney, AKRF

file

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
REGION FOUR
1530 JEFFERSON ROAD
ROCHESTER, NEW YORK 14623-3161
www.dot.ny.gov

ROBERT A. TRAVER, P.E.
ACTING REGIONAL DIRECTOR

JOAN MCDONALD
COMMISSIONER

March 6, 2014

Melissa Bach, THPO
Seneca Nation of Indians
90 O:hi'yoh Way
Salamanca, NY 14779

RE: Portageville Bridge Project
PIN 4935.79.101 / 08PR04896
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Section 106 Documentation Package and Consulting Party Meeting

Dear Melissa Bach:

As an approved Consulting Party to the Section 106 process for the Portageville Bridge Project, you are cordially invited to participate in a Consulting Party meeting, scheduled for March 20, 2014 at 1:00 PM. The meeting will be held in the Genesee Conference Room, on the third floor on the New York State Department of Transportation (NYSDOT) Region 4 office building. A map and directions are attached. In addition we will have phone-in/WebEx conference capabilities for members that cannot attend in person. Representatives from both the Federal Highway Administration (FHWA) and NYSDOT are expected to participate. We invite you to meet separately with FHWA and NYSDOT representatives, based on your availability, to discuss and consider your views on the Project and its potential to affect properties of religious and cultural significance to the Seneca Nation.

Background on the Section 106 Process

An Environmental Impact Statement (EIS) being prepared for this Project in accordance with the National Environmental Policy Act (NEPA) considers a "New Bridge on Parallel Alignment/Remove Existing Bridge" as the Preferred Alternative. Based on the proposed funding and regulatory approvals initially anticipated for the Project, a Draft EIS (DEIS) was previously prepared pursuant to New York State's State Environmental Quality Review Act (SEQRA), with NYSDOT as the lead agency. The DEIS was published in November 2012, with a public review period held from November 26, 2012 through February 1, 2013 and a public hearing in January 2013. The Project's potential impacts on historic properties were assessed as part of the SEQRA DEIS in accordance with the New York State Historic Preservation Act (SHPA) of 1980, as set forth in Section 14.09 of the New York State Parks, Recreation and Historic Preservation Law. The documentation prepared in accordance with the Section 14.09 of the SHPA provides the basis for meeting obligations under Section 106, as both laws require similar procedures to identify historic properties and evaluate potential impacts.

In addition, substantial consultation was undertaken with the New York State Historic Preservation Office (SHPO), and outreach was also undertaken with Native American tribes and the public. Subsequent to that process, potential federal funding through the Congestion Mitigation and Air Quality Improvement (CMAQ) Program was identified. As a result, the Project is now subject to the Section 106 of the NHPA. The Section 106 review process is being progressed in accordance with its implementing regulations (36 CFR Part 800), and in coordination with the EIS. The analyses presented in the EIS anticipate an Estimated Time of Completion of December 31, 2017. Two alternatives will be evaluated in the EIS, the No Action/Maintenance Alternative and the Preferred Alternative.

For more information on the Project and schedule please visit the Project's website:

https://www.dot.ny.gov/portagevillebridge

Adverse Effect Finding and MOA

Applying the criteria of effects (36 CFR 800.5(a)(1)), FHWA in coordination with the NYSDOT, and in consultation with the SHPO, anticipates a finding of Adverse Effect for the Project, due to the proposed removal and demolition of the Portageville Bridge and alterations to other contributing resources in Letchworth State Park, a property listed in the National Register of Historic Places. The enclosed Section 106 Finding Documentation, prepared in accordance with the standards outlined in 36 CFR 800.11(e), provides project information and documents the evaluation of the Project's effects on historic properties.

The Section 106 process involves consultation to resolve adverse effects and to develop a Memorandum of Agreement (MOA) documenting actions that have been agreed upon to mitigate adverse effects. A Preliminary Draft MOA is being distributed at this time, for your review and input.

Consulting Party Meeting

The purpose of this meeting is to provide an opportunity for Section 106 Consulting Parties to offer their views and to participate in the resolution of adverse effects, including the development of mitigation measures. As part of the Section 106 consultation process, FHWA, in coordination with NYSDOT and in consultation with the NYS Historic Preservation Office (SHPO), will consider the views of Consulting Parties in seeking ways to mitigate adverse effects on historic properties.
In preparation for the Consulting Party meeting we encourage you to read the enclosed materials:

- FHWA letter – approved Consulting Party list (1-17-14)
- Section 106 Finding Documentation with Appendices A-F
- NYSDOT cover letter & request for SHPO concurrence with Adverse Effect (2-11-14)
- SHPO concurrence with Adverse Effect (2-20-14)
- *Preliminary Draft* Memorandum of Agreement with Appendices
- Meeting info (map and directions)

We request that you submit any written comments on the Draft MOA within a 30 day review period ending on April 8, 2014.

We would appreciate your response by the close of business on March 12, 2014, to let us know if you plan to attend the Consulting Party meeting in person or remotely. Please register by phone or email with myself at (585)-272-4833 or Christopher.caraccilo@dot.ny.gov.

Sincerely,

Chris Caraccilo

Christopher Caraccilo
Cultural Resource Coordinator
NYSDOT Region 4

Enclosures

cc: Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kelly Fanizzo, ACHP
Julian Adams, OPRHP/SHPO
Ray Hessinger, NYSDOT
Dan Hitt, NYSDOT

bcc: Mary Santangelo, NYSDOT
Catherine Leslie, NYSDOT
Julie Cowing, AKRF
Chris Calvert, AKRF
Claudia Cooney, AKRF

file

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
REGION FOUR
1530 JEFFERSON ROAD
ROCHESTER, NEW YORK 14623-3161
www.dot.ny.gov

ROBERT A. TRAVER, P.E.
ACTING REGIONAL DIRECTOR

JOAN MCDONALD
COMMISSIONER

March 6, 2014

Chief Darwin Hill
Tonawanda Seneca Nation
7027 Meadville Road
Basom, NY 14013

RE: Portageville Bridge Project
PIN 4935.79.101 / 08PR04896
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Section 106 Documentation Package and Consulting Party Meeting

Dear Chief Hill:

As an approved Consulting Party to the Section 106 process for the Portageville Bridge Project, you are cordially invited to participate in a Consulting Party meeting, scheduled for March 20, 2014 at 1:00 PM. The meeting will be held in the Genesee Conference Room, on the third floor on the New York State Department of Transportation (NYSDOT) Region 4 office building. A map and directions are attached. In addition we will have phone-in/WebEx conference capabilities for members that cannot attend in person. Representatives from both the Federal Highway Administration (FHWA) and NYSDOT are expected to participate. We invite you to meet separately with FHWA and NYSDOT representatives, based on your availability, to discuss and consider your views on the Project and its potential to affect properties of religious and cultural significance to the Tonawanda Seneca Nation.

Background on the Section 106 Process

An Environmental Impact Statement (EIS) being prepared for this Project in accordance with the National Environmental Policy Act (NEPA) considers a "New Bridge on Parallel Alignment/Remove Existing Bridge" as the Preferred Alternative. Based on the proposed funding and regulatory approvals initially anticipated for the Project, a Draft EIS (DEIS) was previously prepared pursuant to New York State's State Environmental Quality Review Act (SEQRA), with NYSDOT as the lead agency. The DEIS was published in November 2012, with a public review period held from November 26, 2012 through February 1, 2013 and a public hearing in January 2013. The Project's potential impacts on historic properties were assessed as part of the SEQRA DEIS in accordance with the New York State Historic Preservation Act (SHPA) of 1980, as set forth in Section 14.09 of the New York State Parks, Recreation and Historic Preservation Law. The documentation prepared in accordance with the Section 14.09 of the SHPA provides the basis for meeting obligations under Section 106, as both laws require similar procedures to identify historic properties and evaluate potential impacts.

In addition, substantial consultation was undertaken with the New York State Historic Preservation Office (SHPO), and outreach was also undertaken with Native American tribes and the public. Subsequent to that process, potential federal funding through the Congestion Mitigation and Air Quality Improvement (CMAQ) Program was identified. As a result, the Project is now subject to the Section 106 of the NHPA. The Section 106 review process is being progressed in accordance with its implementing regulations (36 CFR Part 800), and in coordination with the EIS. The analyses presented in the EIS anticipate an Estimated Time of Completion of December 31, 2017. Two alternatives will be evaluated in the EIS, the No Action/Maintenance Alternative and the Preferred Alternative.

For more information on the Project and schedule please visit the Project's website:

https://www.dot.ny.gov/portagevillebridge

Adverse Effect Finding and MOA

Applying the criteria of effects (36 CFR 800.5(a)(1)), FHWA in coordination with the NYSDOT, and in consultation with the SHPO, anticipates a finding of Adverse Effect for the Project, due to the proposed removal and demolition of the Portageville Bridge and alterations to other contributing resources in Letchworth State Park, a property listed in the National Register of Historic Places. The enclosed Section 106 Finding Documentation, prepared in accordance with the standards outlined in 36 CFR 800.11(e), provides project information and documents the evaluation of the Project's effects on historic properties.

The Section 106 process involves consultation to resolve adverse effects and to develop a Memorandum of Agreement (MOA) documenting actions that have been agreed upon to mitigate adverse effects. A Preliminary Draft MOA is being distributed at this time, for your review and input.

Consulting Party Meeting

The purpose of this meeting is to provide an opportunity for Section 106 Consulting Parties to offer their views and to participate in the resolution of adverse effects, including the development of mitigation measures. As part of the Section 106 consultation process, FHWA, in coordination with NYSDOT and in consultation with the NYS Historic Preservation Office (SHPO), will consider the views of Consulting Parties in seeking ways to mitigate adverse effects on historic properties.
In preparation for the Consulting Party meeting we encourage you to read the enclosed materials:

- FHWA letter – approved Consulting Party list (1-17-14)
- Section 106 Finding Documentation with Appendices A-F
- NYSDOT cover letter & request for SHPO concurrence with Adverse Effect (2-11-14)
- SHPO concurrence with Adverse Effect (2-20-14)
- *Preliminary Draft* Memorandum of Agreement with Appendices
- Meeting info (map and directions)

We request that you submit any written comments on the Draft MOA within a 30 day review period ending on April 8, 2014.

We would appreciate your response by the close of business on March 12, 2014, to let us know if you plan to attend the Consulting Party meeting in person or remotely. Please register by phone or email with myself at (585)-272-4833 or Christopher.caraccilo@dot.ny.gov.

Sincerely,

Chris Caraccilo

Christopher Caraccilo
Cultural Resource Coordinator
NYSDOT Region 4

Enclosures

cc: Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kelly Fanizzo, ACHP
Julian Adams, OPRHP/SHPO
Ray Hessinger, NYSDOT
Dan Hitt, NYSDOT

bcc: Mary Santangelo, NYSDOT
Catherine Leslie, NYSDOT
Julie Cowing, AKRF
Chris Calvert, AKRF
Claudia Cooney, AKRF

file

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
REGION FOUR
1530 JEFFERSON ROAD
ROCHESTER, NEW YORK 14623-3161
www.dot.ny.gov

ROBERT A. TRAVER, P.E.
ACTING REGIONAL DIRECTOR

JOAN MCDONALD
COMMISSIONER

March 6, 2014

Bryan Printup
Tuscarora Environmental Office
5226 E. Walmore Road
Tuscarora Nation
Lewiston, NY 14092

RE: Portageville Bridge Project
PIN 4935.79.101 / 08PR04896
Towns of Portage and Genesee Falls, Livingston and Wyoming County
Section 106 Documentation Package and Consulting Party Meeting

Dear Bryan Printup:

As an approved Consulting Party to the Section 106 process for the Portageville Bridge Project, you are cordially invited to participate in a Consulting Party meeting, scheduled for March 20, 2014 at 1:00 PM. The meeting will be held in the Genesee Conference Room, on the third floor on the New York State Department of Transportation (NYSDOT) Region 4 office building. A map and directions are attached. In addition we will have phone-in/WebEx conference capabilities for members that cannot attend in person. Representatives from both the Federal Highway Administration (FHWA) and NYSDOT are expected to participate. We invite you to meet separately with FHWA and NYSDOT representatives, based on your availability, to discuss and consider your views on the Project and its potential to affect properties of religious and cultural significance to the Tuscarora Nation.

Background on the Section 106 Process

An Environmental Impact Statement (EIS) being prepared for this Project in accordance with the National Environmental Policy Act (NEPA) considers a "New Bridge on Parallel Alignment/Remove Existing Bridge" as the Preferred Alternative. Based on the proposed funding and regulatory approvals initially anticipated for the Project, a Draft EIS (DEIS) was previously prepared pursuant to New York State's State Environmental Quality Review Act (SEQRA), with NYSDOT as the lead agency. The DEIS was published in November 2012, with a public review period held from November 26, 2012 through February 1, 2013 and a public hearing in January 2013. The Project's potential impacts on historic properties were assessed as part of the SEQRA DEIS in accordance with the New York State Historic Preservation Act (SHPA) of 1980, as set forth in Section 14.09 of the New York State Parks, Recreation and Historic Preservation Law. The documentation prepared in accordance with the Section 14.09 of the SHPA provides the basis for meeting obligations under Section 106, as both laws require similar procedures to identify historic properties and evaluate potential impacts.

In addition, substantial consultation was undertaken with the New York State Historic Preservation Office (SHPO), and outreach was also undertaken with Native American tribes and the public. Subsequent to that process, potential federal funding through the Congestion Mitigation and Air Quality Improvement (CMAQ) Program was identified. As a result, the Project is now subject to the Section 106 of the NHPA. The Section 106 review process is being progressed in accordance with its implementing regulations (36 CFR Part 800), and in coordination with the EIS. The analyses presented in the EIS anticipate an Estimated Time of Completion of December 31, 2017. Two alternatives will be evaluated in the EIS, the No Action/Maintenance Alternative and the Preferred Alternative.

For more information on the Project and schedule please visit the Project's website:

https://www.dot.ny.gov/portagevillebridge

Adverse Effect Finding and MOA

Applying the criteria of effects (36 CFR 800.5(a)(1)), FHWA in coordination with the NYSDOT, and in consultation with the SHPO, anticipates a finding of Adverse Effect for the Project, due to the proposed removal and demolition of the Portageville Bridge and alterations to other contributing resources in Letchworth State Park, a property listed in the National Register of Historic Places. The enclosed Section 106 Finding Documentation, prepared in accordance with the standards outlined in 36 CFR 800.11(e), provides project information and documents the evaluation of the Project's effects on historic properties.

The Section 106 process involves consultation to resolve adverse effects and to develop a Memorandum of Agreement (MOA) documenting actions that have been agreed upon to mitigate adverse effects. A Preliminary Draft MOA is being distributed at this time, for your review and input.

Consulting Party Meeting

The purpose of this meeting is to provide an opportunity for Section 106 Consulting Parties to offer their views and to participate in the resolution of adverse effects, including the development of mitigation measures. As part of the Section 106 consultation process, FHWA, in coordination with NYSDOT and in consultation with the NYS Historic Preservation Office (SHPO), will consider the views of Consulting Parties in seeking ways to mitigate adverse effects on historic properties.
In preparation for the Consulting Party meeting we encourage you to read the enclosed materials:

- FHWA letter – approved Consulting Party list (1-17-14)
- Section 106 Finding Documentation with Appendices A-F
- NYSDOT cover letter & request for SHPO concurrence with Adverse Effect (2-11-14)
- SHPO concurrence with Adverse Effect (2-20-14)
- *Preliminary Draft* Memorandum of Agreement with Appendices
- Meeting info (map and directions)

We request that you submit any written comments on the Draft MOA within a 30 day review period ending on April 8, 2014.

We would appreciate your response by the close of business on March 12, 2014, to let us know if you plan to attend the Consulting Party meeting in person or remotely. Please register by phone or email with myself at (585)-272-4833 or Christopher.caraccilo@dot.ny.gov.

Sincerely,

Chris Caraccilo

Christopher Caraccilo
Cultural Resource Coordinator
NYSDOT Region 4

Enclosures

cc: Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kelly Fanizzo, ACHP
Julian Adams, OPRHP/SHPO
Ray Hessinger, NYSDOT
Dan Hitt, NYSDOT

bcc: Mary Santangelo, NYSDOT
Catherine Leslie, NYSDOT
Julie Cowing, AKRF
Chris Calvert, AKRF
Claudia Cooney, AKRF

file

Preserving America's Heritage

March 27, 2014

Mr. Michael S. Kowalczyk
Area Engineer
Federal Highway Administration
New York Division
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

Ref: *Proposed Portageville Bridge Project in the Towns of Portage and Genesee Falls, Livingston and Wyoming Counties, New York*

Dear Mr. Kowalczyk:

The Advisory Council on Historic Preservation (ACHP) has received your notification and supporting documentation regarding the adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800), does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to resolve adverse effects is needed. However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer, affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Additionally, should circumstances change, and it is determined that our participation is needed to conclude the consultation process, please notify us.

Pursuant to 36 CFR §800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the New York State Historic Preservation Office (SHPO), and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the MOA, and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with the notification of adverse effect. If you have any questions or require further assistance, please contact Kelly Fanizzo at 202-606-8507 or at kfanizzo@achp.gov.

Sincerely,

LaShavio Johnson

LaShavio Johnson
Historic Preservation Technician
Office of Federal Agency Programs

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004
Phone:202-606-8503 • Fax: 202-606-8647 • achp@achp.gov • www.achp.gov

Nathan Holth
12534 Houghton Drive
Dewitt, MI, 48820

269-290-2593
nathan@historicbridges.org

March 28, 2014

Christopher P. Caraccilo
Acting Regional Landscape Architect
Regional Cultural Resource Coordinator
NYS Department of Transportation-Region 4
1530 Jefferson Road
Rochester, NY 14623

Subject: Portageville Railroad Bridge Section 106 Consulting Party Comments

Dear Mr. Caraccilo:

As a consulting party for the above listed project I wish to offer the following comments following the consulting party meeting on March 20, 2014. Some of these comments echo those I made during the meeting and are repeated here for emphasis and other comments are additional ideas and questions that came to mind after reviewing my notes from the meeting.

Both comments expressed at the meeting as well as the number of people who currently trespass on the historic bridge demonstrate a public desire for a viewing opportunity from a bridge at this location. Norfolk Southern has unsurprisingly been unwilling to allow pedestrians on what is an active freight line including on the proposed replacement bridge. As such, in my opinion the only way to support the public desire for a viewing opportunity at this location is to find a way to preserve at least a portion of the historic bridge for the public to walk on. Doing so would enhance safety for Norfolk Southern, by diverting potential new bridge trespassers to a legal viewing location. It would also add to the attractions of Letchworth State Park, potentially bringing additional visitors to the park. As such, I recommend additional effort be made to find a way to make this a reality.

I am seeking additional details as to why the Office of Parks, Recreation and Historic Preservation cannot take responsibility for ownership of the historic bridge. This bridge is located within a state park, and its repurposing as a pedestrian structure would make the structure a functional attraction that would be used exclusively by park visitors who have paid a fee to enter the park. As such, ownership of the historic bridge by the park in which it is located seems logical, particularly since the bridge would be a feature of the park and the park would directly benefit from it. Why would it not be possible for the OPRHP to own this bridge as a pedestrian bridge or viewing platform? It is not clear to me how owning this bridge would differ from other structures in the park that are owned and operated by the OPRHP.

If the concern is the cost of operating and maintaining the historic bridge (which in my opinion would require minimal maintenance to support the loads of pedestrians), I am curious whether the fee to enter the park could be increased to support the maintenance of the bridge. Alternatively, could a separate fee be charged to allow visitors to access the bridge which would provide for the maintenance of the bridge? In Maine, visitors pay a fee of $5 to view the landscape from the top of a

bridge tower called the Penobscot Narrows Observatory.
http://www.maine.gov/mdot/pnbo/hoursandrates.htm

Concerns were raised during the meeting about possible visual obstructions to the scenery caused by leaving the historic bridge standing next to its replacement. Before offering a possible solution to this issue, I wish to point out that it is actually the new bridge which will change the visual appearance of the location. This historic bridge has been here for over 100 years. Leaving the historic bridge standing will not increase the visual obstruction or change the visual appearance of the landscape unless you are comparing it to what the valley looked like centuries ago.

That being said, I wish to propose yet another alternative that would in fact reduce the visual impact of the historic bridge, while also providing a viewing platform for visitors. This would involve removing all but a few of the spans toward the western end of the bridge and providing a stairway at the western end to lead up to the western end of the bridge due to required removal of the two westernmost spans. Instead of a complete bridge going across the entire horizon, it would be a much shorter outlook that would only visually obstruct a portion of the valley. I believe this solution greatly decreases the combined visual impact of the project. At the same time it preserves a portion of the historic bridge so visitors can get an idea of what the full historic bridge looked like. It also addresses the public desire for a place to view the scenery of the park from a high-up location by providing a safe, legal location to enjoy spectacular views of the landscape. It also would be a smaller structure (and thus less costly) to maintain than the whole bridge. I have included here a rendering I created that shows what this scenic outlook would look like. There is precedent for reuse of a portion of a bridge in this manner, since it would function similar to the repurposed portion of the bridge in Kinzua Bridge State Park in Pennsylvania:
http://www.dcnr.state.pa.us/stateparks/findapark/kinzuabridge/

If OPRHP would be willing to look at ownership and implementation of one of these preservation alternatives (convert whole bridge for pedestrian use, or retain a few spans for a scenic outlook) I am further wondering if some amount of funding could be provided to OPRHP to aid in converting the historic bridge for reuse. By retaining a substantial portion of the original bridge in its original form, I believe this would meet the spirit of Section 106 Mitigation and that providing some funds to OPRHP to assist in this reuse would be a valid form of mitigation. It was suggested at the meeting that additional mitigation should be considered, so perhaps this would be a good form of additional mitigation.

Additionally, if leaving all or a portion of the historic bridge standing reduced the cost of demolition, could funds in the amount of decreased demolition cost be made available to OPRHP or another potential owner?

Finally, most historic highway bridge projects I have been involved with do a formal “historic bridge marketing” effort to publically offer the bridge to a third party for reuse. I understand that the availability of this bridge was stated in the EIS, but I still feel it would be beneficial to actually market the bridge for reuse, with public notices in newspapers, websites, and with direct mailings to possible new owners (government agencies, trail organizations, philanthropic groups, etc).

I am requesting that additional consideration to the above described preservation possibilities be given. The intent of Section 106 is to seek all potential possibilities to avoid or minimize adverse effect, and I feel that to that end these issues need to be explored further. I also would appreciate answers to some of the questions I have posed.

Please feel free to contact me at any time if you have any questions or concerns regarding my comments.

Sincerely,

Nathan Holth

Nathan Holth

Author/Webmaster, HistoricBridges.org

April 7, 2014

Raymond Hessinger, P.E.
Director, Freight & Passenger Rail Bureau
New York State Department of Transportation
50 Wolf Road, POD 54
Albany, NY 12232
PortagevilleBridge@dot.ny.gov

RE: PIN 4935.79.101, Portageville Bridge Project, Letchworth State Park
Comments on Draft MOA

Dear Mr. Hessinger:

Thank you for the opportunity to comment on the Draft Memorandum of Agreement (dated February 14, 2014) for the Portageville Bridge Project (PIN 4935.79.101) in Letchworth State Park. The Landmark Society of Western New York is a regional not-for-profit preservation organization dedicated to protecting the unique architectural heritage of our region and promoting preservation and planning practices that foster healthy, livable, and sustainable communities.

Our interest in this project concerns not only the built historic resources (the Portageville Bridge itself and the other park resources such as trails, walls, etc.) but also the cultural landscape and viewsheds that make Letchworth State Park as a whole such a significant natural, scenic, cultural, and historic resource.

The comments that follow below are largely a reiteration of the position we presented in response to the NY SEQRA DEIS on January 31, 2013. In general, **we do not believe that the draft MOA provides sufficient, meaningful mitigation for the loss of a highly significant National Register-listed bridge.** While documentation and interpretation of the current bridge is admirable and important, this represents base level mitigation and should serve as a starting point. Documentation only provides a record of what is being lost and does not mitigate the impact that such a loss has on the landscape, the park as a whole, and those who use the park.

After careful evaluation, we **reluctantly agree that the selected Preferred Alternative (a new bridge on parallel alignment / remove existing bridge) is the most appropriate alternative**, acknowledging the need for a more efficient, modern rail crossing. While the loss of the historic Portageville Bridge and the impact on the landscape and viewshed is unfortunate, we believe that two bridges on a parallel alignment would be visually incompatible and would represent a greater negative impact on the landscape and viewshed.

We therefore request the following:

- **Provide a Signature Design for New Bridge**
  When demolishing an important historic resource, it is generally considered good preservation practice to replace what is being lost with something of equal or greater aesthetic, cultural, and architectural value. While the proposed replacement bridge is for the most part visually compatible with its surroundings, its design does nothing to mitigate or justify the loss of the historic Portageville Bridge. This highly sensitive, highly visible, and important setting demands a bridge of signature design, not the "off-the-shelf" design presented in the Section 106 Finding Documentation.

- **Provide Pedestrian Access on New Bridge**
  In addition to proposing a new bridge design that is worthy of this setting, incorporating legal and safe pedestrian access into the new bridge would provide meaningful mitigation for the loss of a National Register-listed bridge. While we understand that pedestrians have accessed the existing bridge illegally, it is foolish to assume that future security measures will prevent similar illegal access from occurring on a new bridge.

  Any of the likely methods to control or restrict access—gates, fencing, etc—will have a significant negative visual impact on the Park that is <u>not represented</u> in any of the plans and graphics developed to date. At the consulting parties meeting on March 20, 2014, Mr. Joseph Picciotti, counsel for Norfolk Southern, labeled this concern as "speculation." This characterization seems both dismissive and evasive. Indeed we are speculating that pedestrian restrictions will have a negative visual impact on the park as Norfolk Southern has not presented any concrete plans.

  One of the four primary goals of the bridge project, as stated on page 2-11 of the SEQRA DEIS, is to, "Minimize dangerous interaction of railroad activities on the Portageville Bridge and Letchworth State Park patrons that trespass on it." Simply providing a barrier to access will not minimize the danger, particularly given the fact that the trains will be traveling at a higher speed. The best way to address this safety issue and to minimize visual impacts to the Park, is to provide safe and legal pedestrian access. A logical, optimal location of a pedestrian crossing would be below the tracks, starting at the level of the Gorge Trail on one side and connecting to the Genesee Greenway Trail on the other side.

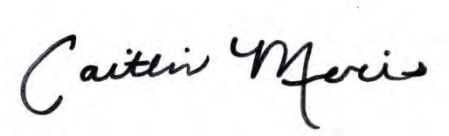
  At the consulting parties meeting on March 20, 2014, Mr. Picciotti also stated that Norfolk Southern does not, as a matter of policy, provide pedestrian access on railroad bridges. While this policy may seem logical enough, we believe the site and the existing bridge are significant enough that they merit attention beyond Norfolk Southern's standard "policy."

- **Provide Additional Mitigation on Abutment Design**
  The documentation provided thus far, including the Visual Resource Assessment in the SEQRA DEIS, fails to consider the visual impacts of the project for the users of the roadways and trails under the proposed bridge. Viewpoints C & D in the DEIS Visual Resource Assessment, located under or directly adjacent to the project site look out over the river. No assessments of views of the rock cut and abutment areas are conducted. Shotcrete on newly excavated rock faces will result in a texture visually incompatible with the existing gorge rock face. If stabilization is necessary netting should be used.

Because of the importance of Letchworth State Park and its associated historic resources, it is incumbent upon NYSDOT and Norfolk Southern to provide a new bridge that both mitigates the loss of a National Register-listed bridge and that honors the beauty and grandeur of this unique natural and cultural landscape. The Landmark Society remains available to assist in this discussion.

We thank you for the opportunity to comment.

Sincerely,



Caitlin Meives
Preservation Planner

SENECA NATION OF INDIANS
TRIBAL HISTORIC PRESERVATION OFFICE
90 OHI:YO' WAY
SALAMANCA, NY 14779
PHONE: (716) 945-1790 FAX: (716) 945-8133

May 20, 2014

NYS DOT Region 4

RE: Portageville RR bridge replacement/ PIN 4935.79.301

Dear Christopher Caraccilo,

Thank you for providing the information for the above reference project and continued discussions.

Pursuant to Section 106 of the National Historic Preservation Act, the Seneca Nation Tribal Historic Preservation Office has a finding of "No Adverse Effect" regarding the Portageville RR bridge replacement project on historical properties eligible for or included on the National Register of Historic Places.

Seneca Nation Tribal Historic Preservation Office has no further issues if the proposed plans are followed. However, if at any time your scope of work changes or you become aware of any archeological items, burials, historical sites, or cultural resources which might be affected by the proposed work, please notify this office as soon as possible.

Thank You

Jay Toth

Jay Toth

Seneca Nation Tribal Archeologist

Jay.toth @sni.org

Ext. 3582

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

June 18, 2014

Dave Herring, Capital Facilities Manager
NYS Office of Parks, Recreation and Historic Preservation-State Parks
One Letchworth State Park
Castile, NY 14427

Re: Portageville Bridge Project
PIN 4935.79.101/08PR04896
Towns of Portage and Genesee Falls, Wyoming and Livingston Counties
Section 106 Draft Memorandum of Agreement (Revised)

Dear Dave Herring:

Enclosed for your review is a revised Draft Memorandum of Agreement (MOA) for the Portageville Bridge Project. The Draft MOA documents agreed-upon measures to mitigate the Project's adverse effects on historic properties due to the removal and demolition of the Portageville Bridge (also referred to as the Portage High Bridge) and associated alterations to other contributing resources in Letchworth State Park, which is listed in the National Register of Historic Places.

The Draft MOA was developed by the New York State Department of Transportation (NYSDOT) and Norfolk Southern, in coordination with the Federal Highway Administration (FHWA) and in consultation with the New York State Historic Preservation Office (SHPO). A Preliminary Draft MOA was distributed for review by Consulting Parties in advance of the meeting held on March 20, 2014, at the NYSDOT Region 4 offices in Rochester. That document has since been revised based on a consideration of comments and discussion at the Consulting Party meeting, and written comments received from Consulting Parties by the end of the 30-day review period. As a result, the enclosed Draft MOA includes the following substantive changes:

- **Cultural Enhancement:** Issues raised by the Seneca Nation of Indians and Tonawanda Seneca Nation with respect to the cultural importance of Letchworth State Park to these Tribal Nations have been addressed through government-to-government consultation between the Seneca Nation and the Federal Highway Administration (FHWA). As a result of that consultation, the MOA now includes a stipulation for the preparation of one additional interpretive kiosk in Letchworth State Park, in recognition of the cultural importance of the area to the Tribal Nations. The location and content of the interpretive kiosk will be determined by OPRHP through consultation among FHWA, the Seneca Nation, and SHPO.
- **Construction Protection Plan**: As an additional requirement for the Construction Protection Plan, the revised MOA stipulates that the Plan will include procedures to be implemented in the event of unanticipated discoveries during construction. These procedures include a temporary suspension of construction activities, pending notification and consultation to determine an appropriate treatment for any new historic property discovered during construction.

Additional issues raised by Consulting Party members during the March 20th meeting, and submitted as written comments have been considered as described below.

- **Retain All or a Portion of the Portage High Bridge:** Several Consulting Party members suggested retaining the existing bridge and converting the structure for use as a pedestrian bridge, or retaining a portion of the bridge to create a viewing platform.

  The option of retaining the existing bridge was initially evaluated in the Draft Environmental Impact Statement (DEIS) prepared for the Project in accordance with the New York State Environmental Quality Review Act (SEQRA) in 2012. Based upon the previous analyses, and in consideration of public and agency input, potential *Alternative 5: New Bridge on Parallel Alignment / Convey Existing Bridge* was eliminated from further study in the current DEIS, prepared in accordance with the National Environmental Policy Act (NEPA). This potential alternative was determined to be unreasonable since conveyance of the bridge is not practical or feasible in the absence of a new owner.

  The New York State Office of Parks, Recreation, and Historic Preservation (OPRHP), which has jurisdiction over Letchworth State Park, is unable to assume ownership of the existing bridge due to the cost of rehabilitation and ongoing maintenance needed to retain the structure and ensure public safety. Over the past six years of outreach to agencies, stakeholders and the public in association with the SEQRA DEIS and the NEPA DEIS, no other entity has come forward to take ownership, maintain, and accept liability for the structure. Thus, no potential new owner has been identified.

  Without a responsible entity, the option of retaining a portion of the existing bridge as a pedestrian walkway or viewing platform is not practical and feasible, despite suggestions from Consulting Party members to charge a higher admittance to Letchworth State Park or a separate fee to access the bridge. Therefore, no changes have been made to the Draft MOA in association with proposals to retain all or a portion of the Portage High Bridge.

- **Provide a Signature Design for the New Bridge:** One Consulting Party suggested a "signature design" for the new bridge.

  Bridge configurations frequently used for highway crossings which might be interpreted as having distinctive or signature profiles, such as a suspension bridge or a cable stayed bridge, are not suitable for North American freight rail loadings. Four main factors affect the design of any bridge – geography, loadings, aesthetics, and cost.

  Based on these factors, three suitable bridge types were identified for the replacement bridge —a trestle, a continuous deck truss, and a spandrel braced arch. After careful consideration, Norfolk Southern and its engineers have selected the arch bridge design as best suited to the project setting in an area of significant historic, natural and scenic importance. The arch design provides advantages over the trestle and deck truss design styles by eliminating the need for supports in the river bed and minimizing disturbance to the gorge walls and floor from cantilevered construction methods.

  The proposed arch design has received positive feedback, including comments at public hearings and Citizens Advisory Committee meetings, as it is less intrusive in the viewshed. The arch bridge design has received additional support in the form of positive reviews in an article in "The Civil Engineering News" (February 2013), which noted the successful balancing of the competing goals of providing a modern freight rail structure while also being sensitive to the important historic setting in Letchworth State Park. Therefore no changes have been made to the MOA in association with proposals to provide a signature design for the new bridge.

- **Provide Pedestrian Access on New Bridge:** Several Consulting Party members indicated a desire for safe and legal pedestrian access on the new bridge. In addition, there is a concern that likely methods to control or restrict access – gates, fencing, etc. – would have a negative visual impact on the park.

  While located in a public park, the Norfolk Southern rail corridor is private property. The company acknowledges the request for pedestrian access on the new bridge, but Norfolk Southern policy prohibits such access in an effort to ensure the safety of rail operations, rail workers, and the public. In addition, Norfolk Southern has an interest in avoiding potential liability issues that may be generated by inviting the public to access private property associated with an active rail line. Any measures to restrict public access to the new rail bridge would be implemented on the approaches to the bridge, rather than on the bridge itself, and therefore would not be visible in views of the new bridge.

In summary, no changes have been made to the MOA in response to the request for pedestrian access on the new bridge.

- **Abutment Design:** Comments were made related to the new bridge's visual effect on Letchworth State Park where the bridge meets the gorge wall in an area of rock cut, and at the bridge abutments/concrete piers that support the bridge's approach spans. Aesthetic treatments were requested as a mitigation measure.

  Due to concerns that aesthetic treatment of the bridge abutments/piers could invite vandalism, no additional mitigation measures have been included in the MOA for the design of the bridge abutments. Concerns regarding the potential visual impacts to users of the roadways and trails under the proposed bridge will be addressed in the NEPA DEIS now being prepared. As addressed in the NEPA DEIS, shotcrete is no longer proposed for use on the gorge wall, and drape netting (a metal mesh curtain) will instead be used on the newly exposed rock face to stabilize the rock face and prevent rockfall. The use of drape netting will allow vegetation to grow through the metal mesh, which ultimately will result in less visibility of the drape netting and excavation area.

  There will be limited visibility to the excavated area, because the new bridge as well as topography and foreground vegetation would largely obstruct views. From the three south-facing viewpoints selected for photo simulations (Points A, B and C), topography and foreground vegetation largely obscure views of the existing bridge where it meets the cliff face. The rock excavations for the new bridge will occur behind the existing bridge where the same foreground vegetation and topography that obscure views of the existing bridge will also obscure views of the new bridge.

The Draft MOA will be made available to the public as part of the DEIS for the Project, to be published in early July 2014, and then undergo final revisions as appropriate based on a consideration of any comments received by the end of the public review period. At that time, Section 106 Consulting Parties will be provided an opportunity to indicate their concurrence with the outcome of consultation by signing the final MOA as Concurring Parties.

Sincerely,

Raymond F. Hessinger, P.E.
Director, Freight and Passenger Rail Bureau

Encl: Section 106 Draft MOA (revised)

cc: Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kelly Fanizzo, ACHP
Julian Adams, OPRHP/SHPO
Daniel Hitt, NYSDOT Office of Environment
Christopher Caraccilo, NYSDOT Region 4

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

June 18, 2014

Melissa Bach, THPO
Seneca Nation of Indians
90 O:hi'yoh Way
Salamanca, NY 14779

Re: Portageville Bridge Project
PIN 4935.79.101/08PR04896
Towns of Portage and Genesee Falls, Wyoming and Livingston Counties
Section 106 Draft Memorandum of Agreement (Revised)

Dear Melissa Bach:

Enclosed for your review is a revised Draft Memorandum of Agreement (MOA) for the Portageville Bridge Project. The Draft MOA documents agreed-upon measures to mitigate the Project's adverse effects on historic properties due to the removal and demolition of the Portageville Bridge (also referred to as the Portage High Bridge) and associated alterations to other contributing resources in Letchworth State Park, which is listed in the National Register of Historic Places.

The Draft MOA was developed by the New York State Department of Transportation (NYSDOT) and Norfolk Southern, in coordination with the Federal Highway Administration (FHWA) and in consultation with the New York State Historic Preservation Office (SHPO). A Preliminary Draft MOA was distributed for review by Consulting Parties in advance of the meeting held on March 20, 2014, at the NYSDOT Region 4 offices in Rochester. That document has since been revised based on a consideration of comments and discussion at the Consulting Party meeting, and written comments received from Consulting Parties by the end of the 30-day review period. As a result, the enclosed Draft MOA includes the following substantive changes:

- **Cultural Enhancement:** Issues raised by the Seneca Nation of Indians and Tonawanda Seneca Nation with respect to the cultural importance of Letchworth State Park to these Tribal Nations have been addressed through government-to-government consultation between the Seneca Nation and the Federal Highway Administration (FHWA). As a result of that consultation, the MOA now includes a stipulation for the preparation of one additional interpretive kiosk in Letchworth State Park, in recognition of the cultural importance of the area to the Tribal Nations. The location and content of the interpretive kiosk will be determined by OPRHP through consultation among FHWA, the Seneca Nation, and SHPO.
- **Construction Protection Plan**: As an additional requirement for the Construction Protection Plan, the revised MOA stipulates that the Plan will include procedures to be implemented in the event of unanticipated discoveries during construction. These procedures include a temporary suspension of construction activities, pending notification and consultation to determine an appropriate treatment for any new historic property discovered during construction.

Additional issues raised by Consulting Party members during the March 20th meeting, and submitted as written comments have been considered as described below.

- **Retain All or a Portion of the Portage High Bridge:** Several Consulting Party members suggested retaining the existing bridge and converting the structure for use as a pedestrian bridge, or retaining a portion of the bridge to create a viewing platform.

  The option of retaining the existing bridge was initially evaluated in the Draft Environmental Impact Statement (DEIS) prepared for the Project in accordance with the New York State Environmental Quality Review Act (SEQRA) in 2012. Based upon the previous analyses, and in consideration of public and agency input, potential *Alternative 5: New Bridge on Parallel Alignment / Convey Existing Bridge* was eliminated from further study in the current DEIS, prepared in accordance with the National Environmental Policy Act (NEPA). This potential alternative was determined to be unreasonable since conveyance of the bridge is not practical or feasible in the absence of a new owner.

  The New York State Office of Parks, Recreation, and Historic Preservation (OPRHP), which has jurisdiction over Letchworth State Park, is unable to assume ownership of the existing bridge due to the cost of rehabilitation and ongoing maintenance needed to retain the structure and ensure public safety. Over the past six years of outreach to agencies, stakeholders and the public in association with the SEQRA DEIS and the NEPA DEIS, no other entity has come forward to take ownership, maintain, and accept liability for the structure. Thus, no potential new owner has been identified.

  Without a responsible entity, the option of retaining a portion of the existing bridge as a pedestrian walkway or viewing platform is not practical and feasible, despite suggestions from Consulting Party members to charge a higher admittance to Letchworth State Park or a separate fee to access the bridge. Therefore, no changes have been made to the Draft MOA in association with proposals to retain all or a portion of the Portage High Bridge.

- **Provide a Signature Design for the New Bridge:** One Consulting Party suggested a "signature design" for the new bridge.

  Bridge configurations frequently used for highway crossings which might be interpreted as having distinctive or signature profiles, such as a suspension bridge or a cable stayed bridge, are not suitable for North American freight rail loadings. Four main factors affect the design of any bridge – geography, loadings, aesthetics, and cost.

  Based on these factors, three suitable bridge types were identified for the replacement bridge —a trestle, a continuous deck truss, and a spandrel braced arch. After careful consideration, Norfolk Southern and its engineers have selected the arch bridge design as best suited to the project setting in an area of significant historic, natural and scenic importance. The arch design provides advantages over the trestle and deck truss design styles by eliminating the need for supports in the river bed and minimizing disturbance to the gorge walls and floor from cantilevered construction methods.

  The proposed arch design has received positive feedback, including comments at public hearings and Citizens Advisory Committee meetings, as it is less intrusive in the viewshed. The arch bridge design has received additional support in the form of positive reviews in an article in "The Civil Engineering News" (February 2013), which noted the successful balancing of the competing goals of providing a modern freight rail structure while also being sensitive to the important historic setting in Letchworth State Park. Therefore no changes have been made to the MOA in association with proposals to provide a signature design for the new bridge.

- **Provide Pedestrian Access on New Bridge:** Several Consulting Party members indicated a desire for safe and legal pedestrian access on the new bridge. In addition, there is a concern that likely methods to control or restrict access – gates, fencing, etc. – would have a negative visual impact on the park.

  While located in a public park, the Norfolk Southern rail corridor is private property. The company acknowledges the request for pedestrian access on the new bridge, but Norfolk Southern policy prohibits such access in an effort to ensure the safety of rail operations, rail workers, and the public. In addition, Norfolk Southern has an interest in avoiding potential liability issues that may be generated by inviting the public to access private property associated with an active rail line. Any measures to restrict public access to the new rail bridge would be implemented on the approaches to the bridge, rather than on the bridge itself, and therefore would not be visible in views of the new bridge.

In summary, no changes have been made to the MOA in response to the request for pedestrian access on the new bridge.

- **Abutment Design:** Comments were made related to the new bridge's visual effect on Letchworth State Park where the bridge meets the gorge wall in an area of rock cut, and at the bridge abutments/concrete piers that support the bridge's approach spans. Aesthetic treatments were requested as a mitigation measure.

  Due to concerns that aesthetic treatment of the bridge abutments/piers could invite vandalism, no additional mitigation measures have been included in the MOA for the design of the bridge abutments. Concerns regarding the potential visual impacts to users of the roadways and trails under the proposed bridge will be addressed in the NEPA DEIS now being prepared. As addressed in the NEPA DEIS, shotcrete is no longer proposed for use on the gorge wall, and drape netting (a metal mesh curtain) will instead be used on the newly exposed rock face to stabilize the rock face and prevent rockfall. The use of drape netting will allow vegetation to grow through the metal mesh, which ultimately will result in less visibility of the drape netting and excavation area.

  There will be limited visibility to the excavated area, because the new bridge as well as topography and foreground vegetation would largely obstruct views. From the three south-facing viewpoints selected for photo simulations (Points A, B and C), topography and foreground vegetation largely obscure views of the existing bridge where it meets the cliff face. The rock excavations for the new bridge will occur behind the existing bridge where the same foreground vegetation and topography that obscure views of the existing bridge will also obscure views of the new bridge.

The Draft MOA will be made available to the public as part of the DEIS for the Project, to be published in early July 2014, and then undergo final revisions as appropriate based on a consideration of any comments received by the end of the public review period. At that time, Section 106 Consulting Parties will be provided an opportunity to indicate their concurrence with the outcome of consultation by signing the final MOA as Concurring Parties.

Sincerely,

Raymond F. Hessinger, P.E.
Director, Freight and Passenger Rail Bureau

Encl: Section 106 Draft MOA (revised)

cc: Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kelly Fanizzo, ACHP
Julian Adams, OPRHP/SHPO
Daniel Hitt, NYSDOT Office of Environment
Christopher Caraccilo, NYSDOT Region 4

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

June 18, 2014

Mr. Jay Toth
Seneca Nation Tribal Archeologist
Seneca Nation of Indians
90 O:hi'yoh Way
Salamanca, NY 14779

Re: Portageville Bridge Project
PIN 4935.79.101/08PR04896
Towns of Portage and Genesee Falls, Wyoming and Livingston Counties
Section 106 Draft Memorandum of Agreement (Revised)

Dear Jay Toth:

Enclosed for your review is a revised Draft Memorandum of Agreement (MOA) for the Portageville Bridge Project. The Draft MOA documents agreed-upon measures to mitigate the Project's adverse effects on historic properties due to the removal and demolition of the Portageville Bridge (also referred to as the Portage High Bridge) and associated alterations to other contributing resources in Letchworth State Park, which is listed in the National Register of Historic Places.

The Draft MOA was developed by the New York State Department of Transportation (NYSDOT) and Norfolk Southern, in coordination with the Federal Highway Administration (FHWA) and in consultation with the New York State Historic Preservation Office (SHPO). A Preliminary Draft MOA was distributed for review by Consulting Parties in advance of the meeting held on March 20, 2014, at the NYSDOT Region 4 offices in Rochester. That document has since been revised based on a consideration of comments and discussion at the Consulting Party meeting, and written comments received from Consulting Parties by the end of the 30-day review period. As a result, the enclosed Draft MOA includes the following substantive changes:

- **Cultural Enhancement:** Issues raised by the Seneca Nation of Indians and Tonawanda Seneca Nation with respect to the cultural importance of Letchworth State Park to these Tribal Nations have been addressed through government-to-government consultation between the Seneca Nation and the Federal Highway Administration (FHWA). As a result of that consultation, the MOA now includes a stipulation for the preparation of one additional interpretive kiosk in Letchworth State Park, in recognition of the cultural importance of the area to the Tribal Nations. The location and content of the interpretive kiosk will be determined by OPRHP through consultation among FHWA, the Seneca Nation, and SHPO.
- **Construction Protection Plan**: As an additional requirement for the Construction Protection Plan, the revised MOA stipulates that the Plan will include procedures to be implemented in the event of unanticipated discoveries during construction. These procedures include a temporary suspension of construction activities, pending notification and consultation to determine an appropriate treatment for any new historic property discovered during construction.

Additional issues raised by Consulting Party members during the March 20th meeting, and submitted as written comments have been considered as described below.

- **Retain All or a Portion of the Portage High Bridge:** Several Consulting Party members suggested retaining the existing bridge and converting the structure for use as a pedestrian bridge, or retaining a portion of the bridge to create a viewing platform.

  The option of retaining the existing bridge was initially evaluated in the Draft Environmental Impact Statement (DEIS) prepared for the Project in accordance with the New York State Environmental Quality Review Act (SEQRA) in 2012. Based upon the previous analyses, and in consideration of public and agency input, potential *Alternative 5: New Bridge on Parallel Alignment / Convey Existing Bridge* was eliminated from further study in the current DEIS, prepared in accordance with the National Environmental Policy Act (NEPA). This potential alternative was determined to be unreasonable since conveyance of the bridge is not practical or feasible in the absence of a new owner.

  The New York State Office of Parks, Recreation, and Historic Preservation (OPRHP), which has jurisdiction over Letchworth State Park, is unable to assume ownership of the existing bridge due to the cost of rehabilitation and ongoing maintenance needed to retain the structure and ensure public safety. Over the past six years of outreach to agencies, stakeholders and the public in association with the SEQRA DEIS and the NEPA DEIS, no other entity has come forward to take ownership, maintain, and accept liability for the structure. Thus, no potential new owner has been identified.

  Without a responsible entity, the option of retaining a portion of the existing bridge as a pedestrian walkway or viewing platform is not practical and feasible, despite suggestions from Consulting Party members to charge a higher admittance to Letchworth State Park or a separate fee to access the bridge. Therefore, no changes have been made to the Draft MOA in association with proposals to retain all or a portion of the Portage High Bridge.

- **Provide a Signature Design for the New Bridge:** One Consulting Party suggested a "signature design" for the new bridge.

  Bridge configurations frequently used for highway crossings which might be interpreted as having distinctive or signature profiles, such as a suspension bridge or a cable stayed bridge, are not suitable for North American freight rail loadings. Four main factors affect the design of any bridge – geography, loadings, aesthetics, and cost.

  Based on these factors, three suitable bridge types were identified for the replacement bridge —a trestle, a continuous deck truss, and a spandrel braced arch. After careful consideration, Norfolk Southern and its engineers have selected the arch bridge design as best suited to the project setting in an area of significant historic, natural and scenic importance. The arch design provides advantages over the trestle and deck truss design styles by eliminating the need for supports in the river bed and minimizing disturbance to the gorge walls and floor from cantilevered construction methods.

  The proposed arch design has received positive feedback, including comments at public hearings and Citizens Advisory Committee meetings, as it is less intrusive in the viewshed. The arch bridge design has received additional support in the form of positive reviews in an article in "The Civil Engineering News" (February 2013), which noted the successful balancing of the competing goals of providing a modern freight rail structure while also being sensitive to the important historic setting in Letchworth State Park. Therefore no changes have been made to the MOA in association with proposals to provide a signature design for the new bridge.

- **Provide Pedestrian Access on New Bridge:** Several Consulting Party members indicated a desire for safe and legal pedestrian access on the new bridge. In addition, there is a concern that likely methods to control or restrict access – gates, fencing, etc. – would have a negative visual impact on the park.

  While located in a public park, the Norfolk Southern rail corridor is private property. The company acknowledges the request for pedestrian access on the new bridge, but Norfolk Southern policy prohibits such access in an effort to ensure the safety of rail operations, rail workers, and the public. In addition, Norfolk Southern has an interest in avoiding potential liability issues that may be generated by inviting the

public to access private property associated with an active rail line. Any measures to restrict public access to the new rail bridge would be implemented on the approaches to the bridge, rather than on the bridge itself, and therefore would not be visible in views of the new bridge.

In summary, no changes have been made to the MOA in response to the request for pedestrian access on the new bridge.

- **Abutment Design:** Comments were made related to the new bridge's visual effect on Letchworth State Park where the bridge meets the gorge wall in an area of rock cut, and at the bridge abutments/concrete piers that support the bridge's approach spans. Aesthetic treatments were requested as a mitigation measure.

  Due to concerns that aesthetic treatment of the bridge abutments/piers could invite vandalism, no additional mitigation measures have been included in the MOA for the design of the bridge abutments. Concerns regarding the potential visual impacts to users of the roadways and trails under the proposed bridge will be addressed in the NEPA DEIS now being prepared. As addressed in the NEPA DEIS, shotcrete is no longer proposed for use on the gorge wall, and drape netting (a metal mesh curtain) will instead be used on the newly exposed rock face to stabilize the rock face and prevent rockfall. The use of drape netting will allow vegetation to grow through the metal mesh, which ultimately will result in less visibility of the drape netting and excavation area.

  There will be limited visibility to the excavated area, because the new bridge as well as topography and foreground vegetation would largely obstruct views. From the three south-facing viewpoints selected for photo simulations (Points A, B and C), topography and foreground vegetation largely obscure views of the existing bridge where it meets the cliff face. The rock excavations for the new bridge will occur behind the existing bridge where the same foreground vegetation and topography that obscure views of the existing bridge will also obscure views of the new bridge.

The Draft MOA will be made available to the public as part of the DEIS for the Project, to be published in early July 2014, and then undergo final revisions as appropriate based on a consideration of any comments received by the end of the public review period. At that time, Section 106 Consulting Parties will be provided an opportunity to indicate their concurrence with the outcome of consultation by signing the final MOA as Concurring Parties.

Sincerely,

Raymond F. Hessinger, P.E.
Director, Freight and Passenger Rail Bureau

Encl: Section 106 Draft MOA (revised)

cc: Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kelly Fanizzo, ACHP
Julian Adams, OPRHP/SHPO
Daniel Hitt, NYSDOT Office of Environment
Christopher Caraccilo, NYSDOT Region 4

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

June 18, 2014

Chief Darwin Hill
Tonawanda Seneca Nation
7027 Meadville Road
Basom, NY 14013

Re: Portageville Bridge Project
PIN 4935.79.101/08PR04896
Towns of Portage and Genesee Falls, Wyoming and Livingston Counties
Section 106 Draft Memorandum of Agreement (Revised)

Dear Chief Hill:

Enclosed for your review is a revised Draft Memorandum of Agreement (MOA) for the Portageville Bridge Project. The Draft MOA documents agreed-upon measures to mitigate the Project's adverse effects on historic properties due to the removal and demolition of the Portageville Bridge (also referred to as the Portage High Bridge) and associated alterations to other contributing resources in Letchworth State Park, which is listed in the National Register of Historic Places.

The Draft MOA was developed by the New York State Department of Transportation (NYSDOT) and Norfolk Southern, in coordination with the Federal Highway Administration (FHWA) and in consultation with the New York State Historic Preservation Office (SHPO). A Preliminary Draft MOA was distributed for review by Consulting Parties in advance of the meeting held on March 20, 2014, at the NYSDOT Region 4 offices in Rochester. That document has since been revised based on a consideration of comments and discussion at the Consulting Party meeting, and written comments received from Consulting Parties by the end of the 30-day review period. As a result, the enclosed Draft MOA includes the following substantive changes:

- **Cultural Enhancement:** Issues raised by the Seneca Nation of Indians and Tonawanda Seneca Nation with respect to the cultural importance of Letchworth State Park to these Tribal Nations have been addressed through government-to-government consultation between the Seneca Nation and the Federal Highway Administration (FHWA). As a result of that consultation, the MOA now includes a stipulation for the preparation of one additional interpretive kiosk in Letchworth State Park, in recognition of the cultural importance of the area to the Tribal Nations. The location and content of the interpretive kiosk will be determined by OPRHP through consultation among FHWA, the Seneca Nation, and SHPO.
- **Construction Protection Plan**: As an additional requirement for the Construction Protection Plan, the revised MOA stipulates that the Plan will include procedures to be implemented in the event of unanticipated discoveries during construction. These procedures include a temporary suspension of construction activities, pending notification and consultation to determine an appropriate treatment for any new historic property discovered during construction.

Additional issues raised by Consulting Party members during the March 20th meeting, and submitted as written comments have been considered as described below.

- **Retain All or a Portion of the Portage High Bridge:** Several Consulting Party members suggested retaining the existing bridge and converting the structure for use as a pedestrian bridge, or retaining a portion of the bridge to create a viewing platform.

  The option of retaining the existing bridge was initially evaluated in the Draft Environmental Impact Statement (DEIS) prepared for the Project in accordance with the New York State Environmental Quality Review Act (SEQRA) in 2012. Based upon the previous analyses, and in consideration of public and agency input, potential *Alternative 5: New Bridge on Parallel Alignment / Convey Existing Bridge* was eliminated from further study in the current DEIS, prepared in accordance with the National Environmental Policy Act (NEPA). This potential alternative was determined to be unreasonable since conveyance of the bridge is not practical or feasible in the absence of a new owner.

  The New York State Office of Parks, Recreation, and Historic Preservation (OPRHP), which has jurisdiction over Letchworth State Park, is unable to assume ownership of the existing bridge due to the cost of rehabilitation and ongoing maintenance needed to retain the structure and ensure public safety. Over the past six years of outreach to agencies, stakeholders and the public in association with the SEQRA DEIS and the NEPA DEIS, no other entity has come forward to take ownership, maintain, and accept liability for the structure. Thus, no potential new owner has been identified.

  Without a responsible entity, the option of retaining a portion of the existing bridge as a pedestrian walkway or viewing platform is not practical and feasible, despite suggestions from Consulting Party members to charge a higher admittance to Letchworth State Park or a separate fee to access the bridge. Therefore, no changes have been made to the Draft MOA in association with proposals to retain all or a portion of the Portage High Bridge.

- **Provide a Signature Design for the New Bridge:** One Consulting Party suggested a "signature design" for the new bridge.

  Bridge configurations frequently used for highway crossings which might be interpreted as having distinctive or signature profiles, such as a suspension bridge or a cable stayed bridge, are not suitable for North American freight rail loadings. Four main factors affect the design of any bridge – geography, loadings, aesthetics, and cost.

  Based on these factors, three suitable bridge types were identified for the replacement bridge —a trestle, a continuous deck truss, and a spandrel braced arch. After careful consideration, Norfolk Southern and its engineers have selected the arch bridge design as best suited to the project setting in an area of significant historic, natural and scenic importance. The arch design provides advantages over the trestle and deck truss design styles by eliminating the need for supports in the river bed and minimizing disturbance to the gorge walls and floor from cantilevered construction methods.

  The proposed arch design has received positive feedback, including comments at public hearings and Citizens Advisory Committee meetings, as it is less intrusive in the viewshed. The arch bridge design has received additional support in the form of positive reviews in an article in "The Civil Engineering News" (February 2013), which noted the successful balancing of the competing goals of providing a modern freight rail structure while also being sensitive to the important historic setting in Letchworth State Park. Therefore no changes have been made to the MOA in association with proposals to provide a signature design for the new bridge.

- **Provide Pedestrian Access on New Bridge:** Several Consulting Party members indicated a desire for safe and legal pedestrian access on the new bridge. In addition, there is a concern that likely methods to control or restrict access – gates, fencing, etc. – would have a negative visual impact on the park.

  While located in a public park, the Norfolk Southern rail corridor is private property. The company acknowledges the request for pedestrian access on the new bridge, but Norfolk Southern policy prohibits such access in an effort to ensure the safety of rail operations, rail workers, and the public. In addition, Norfolk Southern has an interest in avoiding potential liability issues that may be generated by inviting the public to access private property associated with an active rail line. Any measures to restrict public access to the new rail bridge would be implemented on the approaches to the bridge, rather than on the bridge itself, and therefore would not be visible in views of the new bridge.

In summary, no changes have been made to the MOA in response to the request for pedestrian access on the new bridge.

- **Abutment Design:** Comments were made related to the new bridge's visual effect on Letchworth State Park where the bridge meets the gorge wall in an area of rock cut, and at the bridge abutments/concrete piers that support the bridge's approach spans. Aesthetic treatments were requested as a mitigation measure.

  Due to concerns that aesthetic treatment of the bridge abutments/piers could invite vandalism, no additional mitigation measures have been included in the MOA for the design of the bridge abutments. Concerns regarding the potential visual impacts to users of the roadways and trails under the proposed bridge will be addressed in the NEPA DEIS now being prepared. As addressed in the NEPA DEIS, shotcrete is no longer proposed for use on the gorge wall, and drape netting (a metal mesh curtain) will instead be used on the newly exposed rock face to stabilize the rock face and prevent rockfall. The use of drape netting will allow vegetation to grow through the metal mesh, which ultimately will result in less visibility of the drape netting and excavation area.

  There will be limited visibility to the excavated area, because the new bridge as well as topography and foreground vegetation would largely obstruct views. From the three south-facing viewpoints selected for photo simulations (Points A, B and C), topography and foreground vegetation largely obscure views of the existing bridge where it meets the cliff face. The rock excavations for the new bridge will occur behind the existing bridge where the same foreground vegetation and topography that obscure views of the existing bridge will also obscure views of the new bridge.

The Draft MOA will be made available to the public as part of the DEIS for the Project, to be published in early July 2014, and then undergo final revisions as appropriate based on a consideration of any comments received by the end of the public review period. At that time, Section 106 Consulting Parties will be provided an opportunity to indicate their concurrence with the outcome of consultation by signing the final MOA as Concurring Parties.

Sincerely,

Raymond F. Hessinger, P.E.
Director, Freight and Passenger Rail Bureau

Encl: Section 106 Draft MOA (revised)

cc: Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kelly Fanizzo, ACHP
Julian Adams, OPRHP/SHPO
Daniel Hitt, NYSDOT Office of Environment
Christopher Caraccilo, NYSDOT Region 4

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

June 18, 2014

Bryan Printup
Tuscarora Environmental Office
5226 E Walmore Road
Tuscarora Nation
Lewiston, NY 14092

Re: Portageville Bridge Project
PIN 4935.79.101/08PR04896
Towns of Portage and Genesee Falls, Wyoming and Livingston Counties
Section 106 Draft Memorandum of Agreement (Revised)

Dear Bryan Printup:

Enclosed for your review is a revised Draft Memorandum of Agreement (MOA) for the Portageville Bridge Project. The Draft MOA documents agreed-upon measures to mitigate the Project's adverse effects on historic properties due to the removal and demolition of the Portageville Bridge (also referred to as the Portage High Bridge) and associated alterations to other contributing resources in Letchworth State Park, which is listed in the National Register of Historic Places.

The Draft MOA was developed by the New York State Department of Transportation (NYSDOT) and Norfolk Southern, in coordination with the Federal Highway Administration (FHWA) and in consultation with the New York State Historic Preservation Office (SHPO). A Preliminary Draft MOA was distributed for review by Consulting Parties in advance of the meeting held on March 20, 2014, at the NYSDOT Region 4 offices in Rochester. That document has since been revised based on a consideration of comments and discussion at the Consulting Party meeting, and written comments received from Consulting Parties by the end of the 30-day review period. As a result, the enclosed Draft MOA includes the following substantive changes:

- **Cultural Enhancement:** Issues raised by the Seneca Nation of Indians and Tonawanda Seneca Nation with respect to the cultural importance of Letchworth State Park to these Tribal Nations have been addressed through government-to-government consultation between the Seneca Nation and the Federal Highway Administration (FHWA). As a result of that consultation, the MOA now includes a stipulation for the preparation of one additional interpretive kiosk in Letchworth State Park, in recognition of the cultural importance of the area to the Tribal Nations. The location and content of the interpretive kiosk will be determined by OPRHP through consultation among FHWA, the Seneca Nation, and SHPO.
- **Construction Protection Plan**: As an additional requirement for the Construction Protection Plan, the revised MOA stipulates that the Plan will include procedures to be implemented in the event of unanticipated discoveries during construction. These procedures include a temporary suspension of construction activities, pending notification and consultation to determine an appropriate treatment for any new historic property discovered during construction.

Additional issues raised by Consulting Party members during the March 20th meeting, and submitted as written comments have been considered as described below.

- **Retain All or a Portion of the Portage High Bridge:** Several Consulting Party members suggested retaining the existing bridge and converting the structure for use as a pedestrian bridge, or retaining a portion of the bridge to create a viewing platform.

  The option of retaining the existing bridge was initially evaluated in the Draft Environmental Impact Statement (DEIS) prepared for the Project in accordance with the New York State Environmental Quality Review Act (SEQRA) in 2012. Based upon the previous analyses, and in consideration of public and agency input, potential *Alternative 5: New Bridge on Parallel Alignment / Convey Existing Bridge* was eliminated from further study in the current DEIS, prepared in accordance with the National Environmental Policy Act (NEPA). This potential alternative was determined to be unreasonable since conveyance of the bridge is not practical or feasible in the absence of a new owner.

  The New York State Office of Parks, Recreation, and Historic Preservation (OPRHP), which has jurisdiction over Letchworth State Park, is unable to assume ownership of the existing bridge due to the cost of rehabilitation and ongoing maintenance needed to retain the structure and ensure public safety. Over the past six years of outreach to agencies, stakeholders and the public in association with the SEQRA DEIS and the NEPA DEIS, no other entity has come forward to take ownership, maintain, and accept liability for the structure. Thus, no potential new owner has been identified.

  Without a responsible entity, the option of retaining a portion of the existing bridge as a pedestrian walkway or viewing platform is not practical and feasible, despite suggestions from Consulting Party members to charge a higher admittance to Letchworth State Park or a separate fee to access the bridge. Therefore, no changes have been made to the Draft MOA in association with proposals to retain all or a portion of the Portage High Bridge.

- **Provide a Signature Design for the New Bridge:** One Consulting Party suggested a "signature design" for the new bridge.

  Bridge configurations frequently used for highway crossings which might be interpreted as having distinctive or signature profiles, such as a suspension bridge or a cable stayed bridge, are not suitable for North American freight rail loadings. Four main factors affect the design of any bridge – geography, loadings, aesthetics, and cost.

  Based on these factors, three suitable bridge types were identified for the replacement bridge —a trestle, a continuous deck truss, and a spandrel braced arch. After careful consideration, Norfolk Southern and its engineers have selected the arch bridge design as best suited to the project setting in an area of significant historic, natural and scenic importance. The arch design provides advantages over the trestle and deck truss design styles by eliminating the need for supports in the river bed and minimizing disturbance to the gorge walls and floor from cantilevered construction methods.

  The proposed arch design has received positive feedback, including comments at public hearings and Citizens Advisory Committee meetings, as it is less intrusive in the viewshed. The arch bridge design has received additional support in the form of positive reviews in an article in "The Civil Engineering News" (February 2013), which noted the successful balancing of the competing goals of providing a modern freight rail structure while also being sensitive to the important historic setting in Letchworth State Park. Therefore no changes have been made to the MOA in association with proposals to provide a signature design for the new bridge.

- **Provide Pedestrian Access on New Bridge:** Several Consulting Party members indicated a desire for safe and legal pedestrian access on the new bridge. In addition, there is a concern that likely methods to control or restrict access – gates, fencing, etc. – would have a negative visual impact on the park.

  While located in a public park, the Norfolk Southern rail corridor is private property. The company acknowledges the request for pedestrian access on the new bridge, but Norfolk Southern policy prohibits such access in an effort to ensure the safety of rail operations, rail workers, and the public. In addition, Norfolk Southern has an interest in avoiding potential liability issues that may be generated by inviting the

public to access private property associated with an active rail line. Any measures to restrict public access to the new rail bridge would be implemented on the approaches to the bridge, rather than on the bridge itself, and therefore would not be visible in views of the new bridge.

In summary, no changes have been made to the MOA in response to the request for pedestrian access on the new bridge.

- **Abutment Design:** Comments were made related to the new bridge's visual effect on Letchworth State Park where the bridge meets the gorge wall in an area of rock cut, and at the bridge abutments/concrete piers that support the bridge's approach spans. Aesthetic treatments were requested as a mitigation measure.

  Due to concerns that aesthetic treatment of the bridge abutments/piers could invite vandalism, no additional mitigation measures have been included in the MOA for the design of the bridge abutments. Concerns regarding the potential visual impacts to users of the roadways and trails under the proposed bridge will be addressed in the NEPA DEIS now being prepared. As addressed in the NEPA DEIS, shotcrete is no longer proposed for use on the gorge wall, and drape netting (a metal mesh curtain) will instead be used on the newly exposed rock face to stabilize the rock face and prevent rockfall. The use of drape netting will allow vegetation to grow through the metal mesh, which ultimately will result in less visibility of the drape netting and excavation area.

  There will be limited visibility to the excavated area, because the new bridge as well as topography and foreground vegetation would largely obstruct views. From the three south-facing viewpoints selected for photo simulations (Points A, B and C), topography and foreground vegetation largely obscure views of the existing bridge where it meets the cliff face. The rock excavations for the new bridge will occur behind the existing bridge where the same foreground vegetation and topography that obscure views of the existing bridge will also obscure views of the new bridge.

The Draft MOA will be made available to the public as part of the DEIS for the Project, to be published in early July 2014, and then undergo final revisions as appropriate based on a consideration of any comments received by the end of the public review period. At that time, Section 106 Consulting Parties will be provided an opportunity to indicate their concurrence with the outcome of consultation by signing the final MOA as Concurring Parties.

Sincerely,

Raymond F. Hessinger, P.E.
Director, Freight and Passenger Rail Bureau

Encl: Section 106 Draft MOA (revised)

cc: Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kelly Fanizzo, ACHP
Julian Adams, OPRHP/SHPO
Daniel Hitt, NYSDOT Office of Environment
Christopher Caraccilo, NYSDOT Region 4

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

June 18, 2014

Ms. Caitlin Meives, Preservation Planner
Landmark Society of Western New York
133 S. Fitzhugh Street
Rochester, NY 14608

Re: Portageville Bridge Project
PIN 4935.79.101/08PR04896
Towns of Portage and Genesee Falls, Wyoming and Livingston Counties
Section 106 Draft Memorandum of Agreement (Revised)

Dear Caitlin Meives:

Enclosed for your review is a revised Draft Memorandum of Agreement (MOA) for the Portageville Bridge Project. The Draft MOA documents agreed-upon measures to mitigate the Project's adverse effects on historic properties due to the removal and demolition of the Portageville Bridge (also referred to as the Portage High Bridge) and associated alterations to other contributing resources in Letchworth State Park, which is listed in the National Register of Historic Places.

The Draft MOA was developed by the New York State Department of Transportation (NYSDOT) and Norfolk Southern, in coordination with the Federal Highway Administration (FHWA) and in consultation with the New York State Historic Preservation Office (SHPO). A Preliminary Draft MOA was distributed for review by Consulting Parties in advance of the meeting held on March 20, 2014, at the NYSDOT Region 4 offices in Rochester. That document has since been revised based on a consideration of comments and discussion at the Consulting Party meeting, and written comments received from Consulting Parties by the end of the 30-day review period. As a result, the enclosed Draft MOA includes the following substantive changes:

- **Cultural Enhancement:** Issues raised by the Seneca Nation of Indians and Tonawanda Seneca Nation with respect to the cultural importance of Letchworth State Park to these Tribal Nations have been addressed through government-to-government consultation between the Seneca Nation and the Federal Highway Administration (FHWA). As a result of that consultation, the MOA now includes a stipulation for the preparation of one additional interpretive kiosk in Letchworth State Park, in recognition of the cultural importance of the area to the Tribal Nations. The location and content of the interpretive kiosk will be determined by OPRHP through consultation among FHWA, the Seneca Nation, and SHPO.
- **Construction Protection Plan**: As an additional requirement for the Construction Protection Plan, the revised MOA stipulates that the Plan will include procedures to be implemented in the event of unanticipated discoveries during construction. These procedures include a temporary suspension of construction activities, pending notification and consultation to determine an appropriate treatment for any new historic property discovered during construction.

Additional issues raised by Consulting Party members during the March 20th meeting, and submitted as written comments have been considered as described below.

- **Retain All or a Portion of the Portage High Bridge:** Several Consulting Party members suggested retaining the existing bridge and converting the structure for use as a pedestrian bridge, or retaining a portion of the bridge to create a viewing platform.

  The option of retaining the existing bridge was initially evaluated in the Draft Environmental Impact Statement (DEIS) prepared for the Project in accordance with the New York State Environmental Quality Review Act (SEQRA) in 2012. Based upon the previous analyses, and in consideration of public and agency input, potential *Alternative 5: New Bridge on Parallel Alignment / Convey Existing Bridge* was eliminated from further study in the current DEIS, prepared in accordance with the National Environmental Policy Act (NEPA). This potential alternative was determined to be unreasonable since conveyance of the bridge is not practical or feasible in the absence of a new owner.

  The New York State Office of Parks, Recreation, and Historic Preservation (OPRHP), which has jurisdiction over Letchworth State Park, is unable to assume ownership of the existing bridge due to the cost of rehabilitation and ongoing maintenance needed to retain the structure and ensure public safety. Over the past six years of outreach to agencies, stakeholders and the public in association with the SEQRA DEIS and the NEPA DEIS, no other entity has come forward to take ownership, maintain, and accept liability for the structure. Thus, no potential new owner has been identified.

  Without a responsible entity, the option of retaining a portion of the existing bridge as a pedestrian walkway or viewing platform is not practical and feasible, despite suggestions from Consulting Party members to charge a higher admittance to Letchworth State Park or a separate fee to access the bridge. Therefore, no changes have been made to the Draft MOA in association with proposals to retain all or a portion of the Portage High Bridge.

- **Provide a Signature Design for the New Bridge:** One Consulting Party suggested a "signature design" for the new bridge.

  Bridge configurations frequently used for highway crossings which might be interpreted as having distinctive or signature profiles, such as a suspension bridge or a cable stayed bridge, are not suitable for North American freight rail loadings. Four main factors affect the design of any bridge – geography, loadings, aesthetics, and cost.

  Based on these factors, three suitable bridge types were identified for the replacement bridge —a trestle, a continuous deck truss, and a spandrel braced arch. After careful consideration, Norfolk Southern and its engineers have selected the arch bridge design as best suited to the project setting in an area of significant historic, natural and scenic importance. The arch design provides advantages over the trestle and deck truss design styles by eliminating the need for supports in the river bed and minimizing disturbance to the gorge walls and floor from cantilevered construction methods.

  The proposed arch design has received positive feedback, including comments at public hearings and Citizens Advisory Committee meetings, as it is less intrusive in the viewshed. The arch bridge design has received additional support in the form of positive reviews in an article in "The Civil Engineering News" (February 2013), which noted the successful balancing of the competing goals of providing a modern freight rail structure while also being sensitive to the important historic setting in Letchworth State Park. Therefore no changes have been made to the MOA in association with proposals to provide a signature design for the new bridge.

- **Provide Pedestrian Access on New Bridge:** Several Consulting Party members indicated a desire for safe and legal pedestrian access on the new bridge. In addition, there is a concern that likely methods to control or restrict access – gates, fencing, etc. – would have a negative visual impact on the park.

  While located in a public park, the Norfolk Southern rail corridor is private property. The company acknowledges the request for pedestrian access on the new bridge, but Norfolk Southern policy prohibits such access in an effort to ensure the safety of rail operations, rail workers, and the public. In addition, Norfolk Southern has an interest in avoiding potential liability issues that may be generated by inviting the public to access private property associated with an active rail line. Any measures to restrict public access to the new rail bridge would be implemented on the approaches to the bridge, rather than on the bridge itself, and therefore would not be visible in views of the new bridge.

In summary, no changes have been made to the MOA in response to the request for pedestrian access on the new bridge.

- **Abutment Design:** Comments were made related to the new bridge's visual effect on Letchworth State Park where the bridge meets the gorge wall in an area of rock cut, and at the bridge abutments/concrete piers that support the bridge's approach spans. Aesthetic treatments were requested as a mitigation measure.

  Due to concerns that aesthetic treatment of the bridge abutments/piers could invite vandalism, no additional mitigation measures have been included in the MOA for the design of the bridge abutments. Concerns regarding the potential visual impacts to users of the roadways and trails under the proposed bridge will be addressed in the NEPA DEIS now being prepared. As addressed in the NEPA DEIS, shotcrete is no longer proposed for use on the gorge wall, and drape netting (a metal mesh curtain) will instead be used on the newly exposed rock face to stabilize the rock face and prevent rockfall. The use of drape netting will allow vegetation to grow through the metal mesh, which ultimately will result in less visibility of the drape netting and excavation area.

  There will be limited visibility to the excavated area, because the new bridge as well as topography and foreground vegetation would largely obstruct views. From the three south-facing viewpoints selected for photo simulations (Points A, B and C), topography and foreground vegetation largely obscure views of the existing bridge where it meets the cliff face. The rock excavations for the new bridge will occur behind the existing bridge where the same foreground vegetation and topography that obscure views of the existing bridge will also obscure views of the new bridge.

The Draft MOA will be made available to the public as part of the DEIS for the Project, to be published in early July 2014, and then undergo final revisions as appropriate based on a consideration of any comments received by the end of the public review period. At that time, Section 106 Consulting Parties will be provided an opportunity to indicate their concurrence with the outcome of consultation by signing the final MOA as Concurring Parties.

Sincerely,

Raymond F. Hessinger, P.E.
Director, Freight and Passenger Rail Bureau

Encl: Section 106 Draft MOA (revised)

cc: Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kelly Fanizzo, ACHP
Julian Adams, OPRHP/SHPO
Daniel Hitt, NYSDOT Office of Environment
Christopher Caraccilo, NYSDOT Region 4

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

June 18, 2014

Joan Schumaker
Friends of the Genesee Valley Greenway
PO Box 42
Mt. Morris, NY 14510

Re: Portageville Bridge Project
PIN 4935.79.101/08PR04896
Towns of Portage and Genesee Falls, Wyoming and Livingston Counties
Section 106 Draft Memorandum of Agreement (Revised)

Dear Joan Schumaker:

Enclosed for your review is a revised Draft Memorandum of Agreement (MOA) for the Portageville Bridge Project. The Draft MOA documents agreed-upon measures to mitigate the Project's adverse effects on historic properties due to the removal and demolition of the Portageville Bridge (also referred to as the Portage High Bridge) and associated alterations to other contributing resources in Letchworth State Park, which is listed in the National Register of Historic Places.

The Draft MOA was developed by the New York State Department of Transportation (NYSDOT) and Norfolk Southern, in coordination with the Federal Highway Administration (FHWA) and in consultation with the New York State Historic Preservation Office (SHPO). A Preliminary Draft MOA was distributed for review by Consulting Parties in advance of the meeting held on March 20, 2014, at the NYSDOT Region 4 offices in Rochester. That document has since been revised based on a consideration of comments and discussion at the Consulting Party meeting, and written comments received from Consulting Parties by the end of the 30-day review period. As a result, the enclosed Draft MOA includes the following substantive changes:

- **Cultural Enhancement:** Issues raised by the Seneca Nation of Indians and Tonawanda Seneca Nation with respect to the cultural importance of Letchworth State Park to these Tribal Nations have been addressed through government-to-government consultation between the Seneca Nation and the Federal Highway Administration (FHWA). As a result of that consultation, the MOA now includes a stipulation for the preparation of one additional interpretive kiosk in Letchworth State Park, in recognition of the cultural importance of the area to the Tribal Nations. The location and content of the interpretive kiosk will be determined by OPRHP through consultation among FHWA, the Seneca Nation, and SHPO.
- **Construction Protection Plan**: As an additional requirement for the Construction Protection Plan, the revised MOA stipulates that the Plan will include procedures to be implemented in the event of unanticipated discoveries during construction. These procedures include a temporary suspension of construction activities, pending notification and consultation to determine an appropriate treatment for any new historic property discovered during construction.

Additional issues raised by Consulting Party members during the March 20th meeting, and submitted as written comments have been considered as described below.

- **Retain All or a Portion of the Portage High Bridge:** Several Consulting Party members suggested retaining the existing bridge and converting the structure for use as a pedestrian bridge, or retaining a portion of the bridge to create a viewing platform.

  The option of retaining the existing bridge was initially evaluated in the Draft Environmental Impact Statement (DEIS) prepared for the Project in accordance with the New York State Environmental Quality Review Act (SEQRA) in 2012. Based upon the previous analyses, and in consideration of public and agency input, potential *Alternative 5: New Bridge on Parallel Alignment / Convey Existing Bridge* was eliminated from further study in the current DEIS, prepared in accordance with the National Environmental Policy Act (NEPA). This potential alternative was determined to be unreasonable since conveyance of the bridge is not practical or feasible in the absence of a new owner.

  The New York State Office of Parks, Recreation, and Historic Preservation (OPRHP), which has jurisdiction over Letchworth State Park, is unable to assume ownership of the existing bridge due to the cost of rehabilitation and ongoing maintenance needed to retain the structure and ensure public safety. Over the past six years of outreach to agencies, stakeholders and the public in association with the SEQRA DEIS and the NEPA DEIS, no other entity has come forward to take ownership, maintain, and accept liability for the structure. Thus, no potential new owner has been identified.

  Without a responsible entity, the option of retaining a portion of the existing bridge as a pedestrian walkway or viewing platform is not practical and feasible, despite suggestions from Consulting Party members to charge a higher admittance to Letchworth State Park or a separate fee to access the bridge. Therefore, no changes have been made to the Draft MOA in association with proposals to retain all or a portion of the Portage High Bridge.

- **Provide a Signature Design for the New Bridge:** One Consulting Party suggested a "signature design" for the new bridge.

  Bridge configurations frequently used for highway crossings which might be interpreted as having distinctive or signature profiles, such as a suspension bridge or a cable stayed bridge, are not suitable for North American freight rail loadings. Four main factors affect the design of any bridge – geography, loadings, aesthetics, and cost.

  Based on these factors, three suitable bridge types were identified for the replacement bridge —a trestle, a continuous deck truss, and a spandrel braced arch. After careful consideration, Norfolk Southern and its engineers have selected the arch bridge design as best suited to the project setting in an area of significant historic, natural and scenic importance. The arch design provides advantages over the trestle and deck truss design styles by eliminating the need for supports in the river bed and minimizing disturbance to the gorge walls and floor from cantilevered construction methods.

  The proposed arch design has received positive feedback, including comments at public hearings and Citizens Advisory Committee meetings, as it is less intrusive in the viewshed. The arch bridge design has received additional support in the form of positive reviews in an article in "The Civil Engineering News" (February 2013), which noted the successful balancing of the competing goals of providing a modern freight rail structure while also being sensitive to the important historic setting in Letchworth State Park. Therefore no changes have been made to the MOA in association with proposals to provide a signature design for the new bridge.

- **Provide Pedestrian Access on New Bridge:** Several Consulting Party members indicated a desire for safe and legal pedestrian access on the new bridge. In addition, there is a concern that likely methods to control or restrict access – gates, fencing, etc. – would have a negative visual impact on the park.

  While located in a public park, the Norfolk Southern rail corridor is private property. The company acknowledges the request for pedestrian access on the new bridge, but Norfolk Southern policy prohibits such access in an effort to ensure the safety of rail operations, rail workers, and the public. In addition, Norfolk Southern has an interest in avoiding potential liability issues that may be generated by inviting the public to access private property associated with an active rail line. Any measures to restrict public access to the new rail bridge would be implemented on the approaches to the bridge, rather than on the bridge itself, and therefore would not be visible in views of the new bridge.

In summary, no changes have been made to the MOA in response to the request for pedestrian access on the new bridge.

- **Abutment Design:** Comments were made related to the new bridge's visual effect on Letchworth State Park where the bridge meets the gorge wall in an area of rock cut, and at the bridge abutments/concrete piers that support the bridge's approach spans. Aesthetic treatments were requested as a mitigation measure.

  Due to concerns that aesthetic treatment of the bridge abutments/piers could invite vandalism, no additional mitigation measures have been included in the MOA for the design of the bridge abutments. Concerns regarding the potential visual impacts to users of the roadways and trails under the proposed bridge will be addressed in the NEPA DEIS now being prepared. As addressed in the NEPA DEIS, shotcrete is no longer proposed for use on the gorge wall, and drape netting (a metal mesh curtain) will instead be used on the newly exposed rock face to stabilize the rock face and prevent rockfall. The use of drape netting will allow vegetation to grow through the metal mesh, which ultimately will result in less visibility of the drape netting and excavation area.

  There will be limited visibility to the excavated area, because the new bridge as well as topography and foreground vegetation would largely obstruct views. From the three south-facing viewpoints selected for photo simulations (Points A, B and C), topography and foreground vegetation largely obscure views of the existing bridge where it meets the cliff face. The rock excavations for the new bridge will occur behind the existing bridge where the same foreground vegetation and topography that obscure views of the existing bridge will also obscure views of the new bridge.

The Draft MOA will be made available to the public as part of the DEIS for the Project, to be published in early July 2014, and then undergo final revisions as appropriate based on a consideration of any comments received by the end of the public review period. At that time, Section 106 Consulting Parties will be provided an opportunity to indicate their concurrence with the outcome of consultation by signing the final MOA as Concurring Parties.

Sincerely,

Raymond F. Hessinger, P.E.
Director, Freight and Passenger Rail Bureau

Encl: Section 106 Draft MOA (revised)

cc: Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kelly Fanizzo, ACHP
Julian Adams, OPRHP/SHPO
Daniel Hitt, NYSDOT Office of Environment
Christopher Caraccilo, NYSDOT Region 4

STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN MCDONALD
COMMISSIONER

ANDREW M. CUOMO
GOVERNOR

June 18, 2014

Nathan Holth
Historic Bridges.org
12534 Houghton Drive
DeWitt, MI 48820

Re: Portageville Bridge Project
PIN 4935.79.101/08PR04896
Towns of Portage and Genesee Falls, Wyoming and Livingston Counties
Section 106 Draft Memorandum of Agreement (Revised)

Dear Nathan Holth:

Enclosed for your review is a revised Draft Memorandum of Agreement (MOA) for the Portageville Bridge Project. The Draft MOA documents agreed-upon measures to mitigate the Project's adverse effects on historic properties due to the removal and demolition of the Portageville Bridge (also referred to as the Portage High Bridge) and associated alterations to other contributing resources in Letchworth State Park, which is listed in the National Register of Historic Places.

The Draft MOA was developed by the New York State Department of Transportation (NYSDOT) and Norfolk Southern, in coordination with the Federal Highway Administration (FHWA) and in consultation with the New York State Historic Preservation Office (SHPO). A Preliminary Draft MOA was distributed for review by Consulting Parties in advance of the meeting held on March 20, 2014, at the NYSDOT Region 4 offices in Rochester. That document has since been revised based on a consideration of comments and discussion at the Consulting Party meeting, and written comments received from Consulting Parties by the end of the 30-day review period. As a result, the enclosed Draft MOA includes the following substantive changes:

- **Cultural Enhancement:** Issues raised by the Seneca Nation of Indians and Tonawanda Seneca Nation with respect to the cultural importance of Letchworth State Park to these Tribal Nations have been addressed through government-to-government consultation between the Seneca Nation and the Federal Highway Administration (FHWA). As a result of that consultation, the MOA now includes a stipulation for the preparation of one additional interpretive kiosk in Letchworth State Park, in recognition of the cultural importance of the area to the Tribal Nations. The location and content of the interpretive kiosk will be determined by OPRHP through consultation among FHWA, the Seneca Nation, and SHPO.
- **Construction Protection Plan**: As an additional requirement for the Construction Protection Plan, the revised MOA stipulates that the Plan will include procedures to be implemented in the event of unanticipated discoveries during construction. These procedures include a temporary suspension of construction activities, pending notification and consultation to determine an appropriate treatment for any new historic property discovered during construction.

Additional issues raised by Consulting Party members during the March 20th meeting, and submitted as written comments have been considered as described below.

- **Retain All or a Portion of the Portage High Bridge:** Several Consulting Party members suggested retaining the existing bridge and converting the structure for use as a pedestrian bridge, or retaining a portion of the bridge to create a viewing platform.

  The option of retaining the existing bridge was initially evaluated in the Draft Environmental Impact Statement (DEIS) prepared for the Project in accordance with the New York State Environmental Quality Review Act (SEQRA) in 2012. Based upon the previous analyses, and in consideration of public and agency input, potential *Alternative 5: New Bridge on Parallel Alignment / Convey Existing Bridge* was eliminated from further study in the current DEIS, prepared in accordance with the National Environmental Policy Act (NEPA). This potential alternative was determined to be unreasonable since conveyance of the bridge is not practical or feasible in the absence of a new owner.

  The New York State Office of Parks, Recreation, and Historic Preservation (OPRHP), which has jurisdiction over Letchworth State Park, is unable to assume ownership of the existing bridge due to the cost of rehabilitation and ongoing maintenance needed to retain the structure and ensure public safety. Over the past six years of outreach to agencies, stakeholders and the public in association with the SEQRA DEIS and the NEPA DEIS, no other entity has come forward to take ownership, maintain, and accept liability for the structure. Thus, no potential new owner has been identified.

  Without a responsible entity, the option of retaining a portion of the existing bridge as a pedestrian walkway or viewing platform is not practical and feasible, despite suggestions from Consulting Party members to charge a higher admittance to Letchworth State Park or a separate fee to access the bridge. Therefore, no changes have been made to the Draft MOA in association with proposals to retain all or a portion of the Portage High Bridge.

- **Provide a Signature Design for the New Bridge:** One Consulting Party suggested a "signature design" for the new bridge.

  Bridge configurations frequently used for highway crossings which might be interpreted as having distinctive or signature profiles, such as a suspension bridge or a cable stayed bridge, are not suitable for North American freight rail loadings. Four main factors affect the design of any bridge – geography, loadings, aesthetics, and cost.

  Based on these factors, three suitable bridge types were identified for the replacement bridge —a trestle, a continuous deck truss, and a spandrel braced arch. After careful consideration, Norfolk Southern and its engineers have selected the arch bridge design as best suited to the project setting in an area of significant historic, natural and scenic importance. The arch design provides advantages over the trestle and deck truss design styles by eliminating the need for supports in the river bed and minimizing disturbance to the gorge walls and floor from cantilevered construction methods.

  The proposed arch design has received positive feedback, including comments at public hearings and Citizens Advisory Committee meetings, as it is less intrusive in the viewshed. The arch bridge design has received additional support in the form of positive reviews in an article in "The Civil Engineering News" (February 2013), which noted the successful balancing of the competing goals of providing a modern freight rail structure while also being sensitive to the important historic setting in Letchworth State Park. Therefore no changes have been made to the MOA in association with proposals to provide a signature design for the new bridge.

- **Provide Pedestrian Access on New Bridge:** Several Consulting Party members indicated a desire for safe and legal pedestrian access on the new bridge. In addition, there is a concern that likely methods to control or restrict access – gates, fencing, etc. – would have a negative visual impact on the park.

  While located in a public park, the Norfolk Southern rail corridor is private property. The company acknowledges the request for pedestrian access on the new bridge, but Norfolk Southern policy prohibits such access in an effort to ensure the safety of rail operations, rail workers, and the public. In addition, Norfolk Southern has an interest in avoiding potential liability issues that may be generated by inviting the

public to access private property associated with an active rail line. Any measures to restrict public access to the new rail bridge would be implemented on the approaches to the bridge, rather than on the bridge itself, and therefore would not be visible in views of the new bridge.

In summary, no changes have been made to the MOA in response to the request for pedestrian access on the new bridge.

- **Abutment Design:** Comments were made related to the new bridge's visual effect on Letchworth State Park where the bridge meets the gorge wall in an area of rock cut, and at the bridge abutments/concrete piers that support the bridge's approach spans. Aesthetic treatments were requested as a mitigation measure.

  Due to concerns that aesthetic treatment of the bridge abutments/piers could invite vandalism, no additional mitigation measures have been included in the MOA for the design of the bridge abutments. Concerns regarding the potential visual impacts to users of the roadways and trails under the proposed bridge will be addressed in the NEPA DEIS now being prepared. As addressed in the NEPA DEIS, shotcrete is no longer proposed for use on the gorge wall, and drape netting (a metal mesh curtain) will instead be used on the newly exposed rock face to stabilize the rock face and prevent rockfall. The use of drape netting will allow vegetation to grow through the metal mesh, which ultimately will result in less visibility of the drape netting and excavation area.

  There will be limited visibility to the excavated area, because the new bridge as well as topography and foreground vegetation would largely obstruct views. From the three south-facing viewpoints selected for photo simulations (Points A, B and C), topography and foreground vegetation largely obscure views of the existing bridge where it meets the cliff face. The rock excavations for the new bridge will occur behind the existing bridge where the same foreground vegetation and topography that obscure views of the existing bridge will also obscure views of the new bridge.

The Draft MOA will be made available to the public as part of the DEIS for the Project, to be published in early July 2014, and then undergo final revisions as appropriate based on a consideration of any comments received by the end of the public review period. At that time, Section 106 Consulting Parties will be provided an opportunity to indicate their concurrence with the outcome of consultation by signing the final MOA as Concurring Parties.

Sincerely,

Raymond F. Hessinger, P.E.
Director, Freight and Passenger Rail Bureau

Encl: Section 106 Draft MOA (revised)

cc: Robert Davies, FHWA
Michael Kowalczyk, FHWA
Kelly Fanizzo, ACHP
Julian Adams, OPRHP/SHPO
Daniel Hitt, NYSDOT Office of Environment
Christopher Caraccilo, NYSDOT Region 4

Appendix C: Historic and Cultural Resources

C-5 Draft Memorandum of Agreement

MEMORANDUM OF AGREEMENT
AMONG
THE FEDERAL HIGHWAY ADMINISTRATION (FHWA)
NORFOLK SOUTHERN RAILWAY COMPANY (NS)
THE NEW YORK STATE DEPARTMENT OF TRANSPORTATION (NYSDOT)
THE NEW YORK STATE OFFICE OF PARKS, RECREATION AND HISTORIC PRESERVATION (OPRHP)
THE NATIONAL PARK SERVICE (NPS)
AND THE
NEW YORK STATE HISTORIC PRESERVATION OFFICER (NYSHPO)
REGARDING THE
PORTAGEVILLE BRIDGE PROJECT
IN WYOMING AND LIVINGSTON COUNTIES, NEW YORK
Draft June 2014

WHEREAS, the Federal Highway Administration (FHWA), in coordination with the New York State Department of Transportation (NYSDOT), and Norfolk Southern Railway Company (NS) proposes to undertake the Portageville Bridge Project, and this undertaking is partially funded by FHWA; and

WHEREAS, FHWA is the federal lead agency responsible for compliance with Section 106 of the National Historic Preservation Act (NHPA, codified at 16 USC 470f, and herein "Section 106"), and implementing regulations, 36 CFR Part 800 – *Protection of Historic Properties;* and

WHEREAS,the purpose of the project is to address the existing deficiencies at Norfolk Southern's Portageville Bridge (also known as the "Portage High Bridge") by providing a modern rail crossing of the Genesee River at its current location that is capable of carrying current industry standard freight rail loads, to the greatest degree possible meeting Federal Railroad Administration Class 4 speeds, while reducing ongoing maintenance efforts and costs for Norfolk Southern to provide safe, reliable, and efficient rail operations on the Southern Tier route in the State of New York; and

WHEREAS, Norfolk Southern's Southern Tier route passes through Letchworth State Park (LSP), comprised of approximately 14,350 acres located on both sides of the Genesee River in Livingston and Wyoming Counties, New York, and LSP is administered by the New York State Office of Parks, Recreation and Historic Preservation (OPRHP) **(Exhibit A – Project Location**, attached hereto and made a part hereof); and

WHEREAS, Letchworth State Park is a historic property listed in the National Register of Historic Places in 2005 under National Register Criteria A, B, C, and D, and includes 338 inventoried contributing resources, including the Portage High Bridge (the Portageville Bridge); and

WHEREAS, FHWA has invited the NYSDOT, OPRHP, NS, and National Park Service (NPS) to sign this Agreement as invited Signatories; and

WHEREAS, FHWA in coordination with NYSDOT, has consulted with the New York State Historic Preservation Office (SHPO) in accordance with the requirements of 36 CFR Part 800, and the SHPO is a signatory to this Memorandum of Agreement; and

WHEREAS, FHWA in coordination with NYSDOT has established an Area of Potential Effect (APE) for the Project as defined by 36 CFR 800.16(d) established in consultation with NYSHPO; and

WHEREAS, the Project APE encompasses the area within which direct and indirect effects to historic properties may occur, with the "direct effect area" consisting of the limits of disturbance for the Project, which encompass the existing railroad and bridge alignment, areas of proposed construction to the north and south (including the area of the new rail right-of-way as well as the area affected by the relocation of Park Road and the Highbridge Parking Area and areas affected by temporary construction activities), and with the "indirect effect area" encompassing an area within approximately 500 feet, ¼ mile, and ½ mile of the direct effect area (the APE for the Project is depicted on the map presented in **Exhibit B – Area of Potential Effect and Locations of Historic Properties** attached hereto and made a part hereof); and

WHEREAS, FHWA, in cooperation with NYSDOT and NS, is preparing an Environmental Impact Statement (EIS) for the Project in accordance with the National Environmental Policy Act (NEPA), and the EIS identifies the New Bridge on Parallel Alignment / Remove Existing Bridge as the Preferred Alternative ("the Project"); and

WHEREAS, the Project would require the removal and demolition of the existing Portageville Bridge and the removal or alteration of other contributing resources of Letchworth State Park within the direct effect area, including Gorge Trail (Trail #1), Mary Jemison Trail (Trail #2), Park Road, Highbridge Parking Area, a Historic Marker commemorating construction of the Portage High Bridge and stone walls; and

WHEREAS, FHWA, in coordination with NYSDOT and NS, and in consultation with NYSHPO has determined that the proposed removal and demolition of the Portageville Bridge and permanent alteration of other contributing resources of Letchworth State Park would constitute an Adverse Effect as defined by 36 CFR 800.5(a)(1), and has determined that it is appropriate to enter into this Memorandum of Agreement (Agreement) pursuant to 36 CFR 800.6 of Section 106; and

WHEREAS, Historic American Engineering Record (HAER) photographic documentation was previously prepared for the Portageville Bridge and is catalogued in the Library of Congress (HAER NY-54), which includes five photographs taken in 1971 and two historic photographs, and HAER has agreed to prepare additional documentation in accordance with HAER standards; and

WHEREAS, FHWA notified the Advisory Council on Historic Preservation (ACHP) of the Project's Adverse Effect, invited ACHP to participate in the Section 106 process for this Project, and ACHP has declined; and

WHEREAS, the Project is located within the identified area of interest of three federally recognized Indian tribes, and FHWA has consulted with the Seneca Nation of Indians, the Tonawanda Seneca

Nation, and the Tuscarora Nation on a government-to-government basis in accordance with 36 CFR Part 800.2(c)(ii), and invited them to sign this Agreement as concurring parties; and

WHEREAS, through consultation with FHWA, the Seneca Nation has requested that the Project incorporate an educational benefit conveying the historic and cultural importance of Letchworth State Park to the Seneca Nation; and

WHEREAS, in keeping with 36 CFR 800.2(c)(3) and (5), FHWA identified representatives of local governments, individuals, and organizations with a demonstrated interest in the undertaking, approved requests to participate in Section 106 consultation for the Project, and invited these Consulting Parties to sign this Agreement as concurring parties (the Section 106 Consulting Parties for the Project are presented in **Exhibit C – Consulting Parties** attached hereto and made a part hereof); and

WHEREAS, FHWA in coordination with NYSDOT has provided the Consulting Parties and the public opportunities to review Section 106 documents and findings and to comment on the resolution of adverse effects; and

WHEREAS, archaeological investigations completed within the portion of the APE subject to direct effects identified the presence of historic-period archaeological remains related to the Cascade House Historic Site in the east portion of the APE, and these archaeological deposits within the APE as tested were determined not eligible for the National Register based on their lack of further research potential; and

WHEREAS, the NYSHPO concurred with these findings, and with an Avoidance Plan prepared by NS presented hereto as **Exhibit D – Avoidance Plan**, to ensure that construction disturbance does not inadvertently occur in the portion of the Cascade House Historic Site which extends outside the APE to the south; and

WHEREAS, pursuant to 36 CFR 800.2(d)(3), the public is being provided information and an opportunity to provide their views on the resolution of adverse effects under Section 106 in coordination with public involvement procedures carried out in compliance with NEPA, including the distribution of the draft Section 106 Agreement as part of the Draft EIS, with a 45-day public comment period; and

NOW, THEREFORE, FHWA, NPS, NYSHPO, NS, NYSDOT, and OPRHP agree that the Project shall be implemented in accordance with the following stipulations to take into account the effects of the Project on historic properties.

DRAFT

STIPULATIONS

FHWA, in coordination with NYSDOT and NS, shall ensure that the following stipulations are implemented.

I. ARCHAEOLOGICAL RESOURCES

A. Avoidance Plan

NS will implement the recommendations listed below in this subsection for the protection of the Cascade House Historic Site as follows and as set forth in **Exhibit D** hereto:

1. Prior to construction, orange construction fencing will be placed along the perimeter of the construction limits marked in the field and indicated on the site plans.

2. The archaeologically sensitive area located beyond the proposed construction footprint is located outside the APE and privately owned by others. This area will remain undisturbed by Project activities and will be identified on the site plans as "Environmentally Sensitive – Do Not Impact."

3. If future development is proposed for the environmentally sensitive sections of the property it will need to be approved by NYSHPO and may require further archaeological investigation.

B. Staging Area Limitations

To avoid potential effects on known or potential archaeological resources, NS shall impose staging area limitations on the Project contractor as follows:

1. If the parcel on the east approach to the bridge between Portageville Road and the existing NS right-of-way is used for construction staging, the contractor will ensure no subsurface activities in this area occur, to avoid impacting possible archaeological resources. This parcel lies in a historically sensitive area and the type or limits of cultural resources have not yet been determined. This parcel can be used for parking light trucks as long as excessive rutting does not occur. If used for materials storage, road fabric will be installed to prevent material from migrating into surface soils. This parcel will be re-seeded upon completion of construction.

2. No construction activity associated with the Project can occur on the private property along the eastern approach that is south of the proposed NS property line. This is an archaeologically sensitive area protected by the Cascade House Avoidance Plan (see I.A above).

II. ARCHITECTURAL RESOURCES

NS shall undertake the following measures to minimize and mitigate adverse effects to historic properties:

DRAFT

A. Educational and Interpretive Materials

NS shall, as previously agreed upon with NYSHPO, provide certain funding to the New York State Natural Heritage Trust (the "Materials Funding") for OPRHP to prepare the following educational and interpretive materials at Letchworth State Park:

1. An interpretive plan.

2. Salvage, conservation, and installation of a certain amount of the base of Pier 11 of the Portageville Bridge, to include portions of both legs, connecting truss, and both date plates.

3. Two interpretive kiosks, in locations selected by NYSHPO and OPRHP, including potentially one to be located at the proposed new upper parking lot by the new bridge and one at the Upper Falls Overlook adjacent to the Gorge Trail.

4. An interpretive exhibit at the William Pryor Letchworth Museum, documenting the history of the Portage High Bridge within the context of rail history in Letchworth State Park .

NS will have no responsibility with respect to educational and interpretive materials other than the Materials Funding.

B. Historic American Engineering Record (HAER)-Level Recordation

NS shall provide certain funding, as previously agreed upon among NS, NPS, and NYSHPO (the "HAER funding"), to HAER for the preparation of additional HAER-level recordation of the Portageville Bridge through NPS's Heritage Documentation Program. This recordation shall include the following:

1. Archival photography (30 views) of the Portageville Bridge. Photographs, prints, and duplicates will meet appropriate HAER archival standards; and

2. A 10- to 20-page narrative that describes the physical characteristics of the Portageville Bridge and its history.

The submission of copies of the HAER report to appropriate repositories shall be the responsibility of NPS. Copies of the HAER report will be provided to NYSHPO, OPRHP, NS, the New York State Archives, and a local repository such as the William Pryor Letchworth Museum in Letchworth State Park.

NS will have no responsibility with respect to HAER recordation other than the HAER funding.

DRAFT

C. Restoration of Portions of the Gorge Trail

1. For the portion of the Gorge Trail that will be relocated to accommodate the Project, NS will incorporate the following measures in the relocated trail:

   a) Salvage, to the extent feasible, stone from walls in Letchworth State Park that need to be removed by the Project.

   b) Reuse as feasible portions of salvaged stone to rebuild stone walls along the portion of the Gorge Trail to be relocated, using a design similar to the existing historic stone walls. **Exhibit E – Area of Relocated Gorge Trail,** attached hereto and made a part hereof, shows the area where the new stone wall will be created.

2. In addition, NS shall provide, as previously agreed upon among NS and OPRHP, certain funding to OPRHP toward the restoration of the existing Gorge Trail between the existing construction zone for the Project (at the stone staircase north of the existing bridge) and the Middle Falls (located outside the Project's construction area). OPRHP and NS have agreed that the funding will be used to repoint certain identified walls, replace and repair certain damaged stairs, and replace or repair timber railings as identified and agreed upon between OPRHP and NS.

D. Construction Protection Plan

To avoid inadvertent Project-related construction damage to historic park features, NS, in consultation with OPRHP, will develop a Construction Protection Plan for historic properties.

1. The Construction Protection Plan shall be developed and submitted to OPRHP and FHWA for review and approval prior to initiation of any excavation and construction activities.

2. The Construction Protection Plan shall describe measures to protect historic park features from vibration, excavation, and damage from heavy equipment.

3. The Plan shall describe measures for the control and/or management of fugitive dust, erosion, noise, lighting and visual effects of construction activities to the extent practicable.

4. The Construction Protection Plan shall include procedures to address the unanticipated discovery of historic or cultural materials during construction. If new historic properties are discovered, procedures for notification and consultation for *Post-Review Discoveries* shall be implemented, pursuant to the applicable provisions of 36 CFR 800.13(b)(3). Any such objects shall not be destroyed or removed, and shall be protected from disturbance pending notification to the appropriate authorities, NS personnel, and representatives of FHWA, NYSHPO, and NYSDOT. The site shall be inspected by qualified professional archaeologists,

and construction in the immediate vicinity of the discovery shall be temporarily suspended until an appropriate treatment is determined as specified in the Construction Protection Plan.

5. NS shall ensure that historic park features that may be subject to damage by construction activities are covered by the Construction Protection Plan and thereafter ensure that the provisions of the Construction Protection Plan are implemented by the Project contractors.

III. CULTURAL ENHANCEMENT

As an enhancement, NS shall provide certain funding to the New York State Natural Heritage Trust for the preparation of one additional interpretive kiosk in Letchworth State Park to acknowledge the cultural importance of the area to the Seneca Nation. The location and content of the interpretive kiosk will be determined by OPRHP through consultation among the Seneca Nation, FHWA, and NYSHPO.

IV. DISPUTE RESOLUTION

Should any party to this Agreement object in writing to FHWA, or NYSDOT as its designee, regarding any action carried out or proposed with respect to the undertaking or to the implementation of this Agreement, FHWA or NYSDOT as its designee shall consult with the objecting party to resolve the objection. If after initiating consultation, FHWA, or NYSDOT as its designee, determines in coordination with NS that the objection cannot be resolved through consultation, FHWA shall:

A. Forward all documentation relevant to the objection to ACHP, including FHWA's proposed response to the objection, and request that ACHP, within 30 days after receipt of all pertinent documentation, provide FHWA with its advice on the resolution of the objection FHWA will take ACHP's advice into account in reaching a final decision regarding its response to the objection.

B. If ACHP does not provide its advice regarding the dispute within the thirty day time period, FHWA may make a final decision on the dispute and proceed accordingly.

C. FHWA's responsibility to carry out all actions under this Agreement that are not subject to the dispute shall remain unchanged.

V. DURATION, AMENDMENT AND TERMINATION

A. This Memorandum of Agreement shall take effect on the date it is signed by the last Signatory, and will remain in effect for a period of five (5) years from the date of its execution. At such time, the terms of the MOA may be reconsidered, and upon the mutual written consent of all signatories (FHWA, NYSHPO, NS, NYSDOT, and OPRHP), the agreement may be extended.

B. Any Signatory to this Agreement (FHWA, NYSHPO, NS, NYSDOT, and OPRHP) may request that it be amended, whereupon the Signatories will consult to reach a consensus on the proposed amendment. 36 CFR 800.6(c)(7) shall govern the execution of any such amendment. Where no consensus can be reached, the Agreement will not be amended.

C. Any Signatory to this Agreement (FHWA, NYSHPO, NS, NYSDOT, and OPRHP)may terminate it by providing thirty (30) days' notice to the other Signatories, provided that the Signatories will consult during the period prior to termination to seek agreement on amendments or other actions that would avoid termination. Termination of the Agreement will be governed by 36 CFR 800.6(c)(8).

EXECUTION OF THIS MEMORANDUM OFAGREEMENT and implementation of its Stipulations evidences that FHWA has taken into account the effects of the Project on historic properties and afforded the ACHP an opportunity to comment on those effects.

Signatories:

Federal Highway Administration

By: _____ Date: _____

Robert M. Davies, District Engineer

New York State Historic Preservation Officer

By: _____ Date: _____

Ruth Pierpont, Deputy Commissioner/Deputy SHPO

Invited Signatories:

New York State Office of Parks, Recreation and Historic Preservation

By: _____ Date: _____

Name and Title

DRAFT

Norfolk Southern Railway Company

By: _____ Date: _____

Name and Title

New York State Department of Transportation

By: _____ Date: _____

Name and Title

National Park Service

By: _____ Date: _____

Name and Title, Heritage Documentation Programs

Concurring Parties:

Seneca Nation of Indians

By: _____ Date: _____

Name and Title

Tonawanda Seneca Nation

By: _____ Date: _____

Name and Title

DRAFT

Tuscarora Nation

By: _____ Date: _____

Name and Title

DRAFT

Landmark Society of Western New York

By: _____ Date: _____

Name and Title

Friends of the Genesee Valley Greenway

By: _____ Date: _____

Name and Title

HistoricBridges.Org

By: _____ Date: _____

Name and Title

DRAFT

EXHIBIT A
PROJECT LOCATION

1.6.14

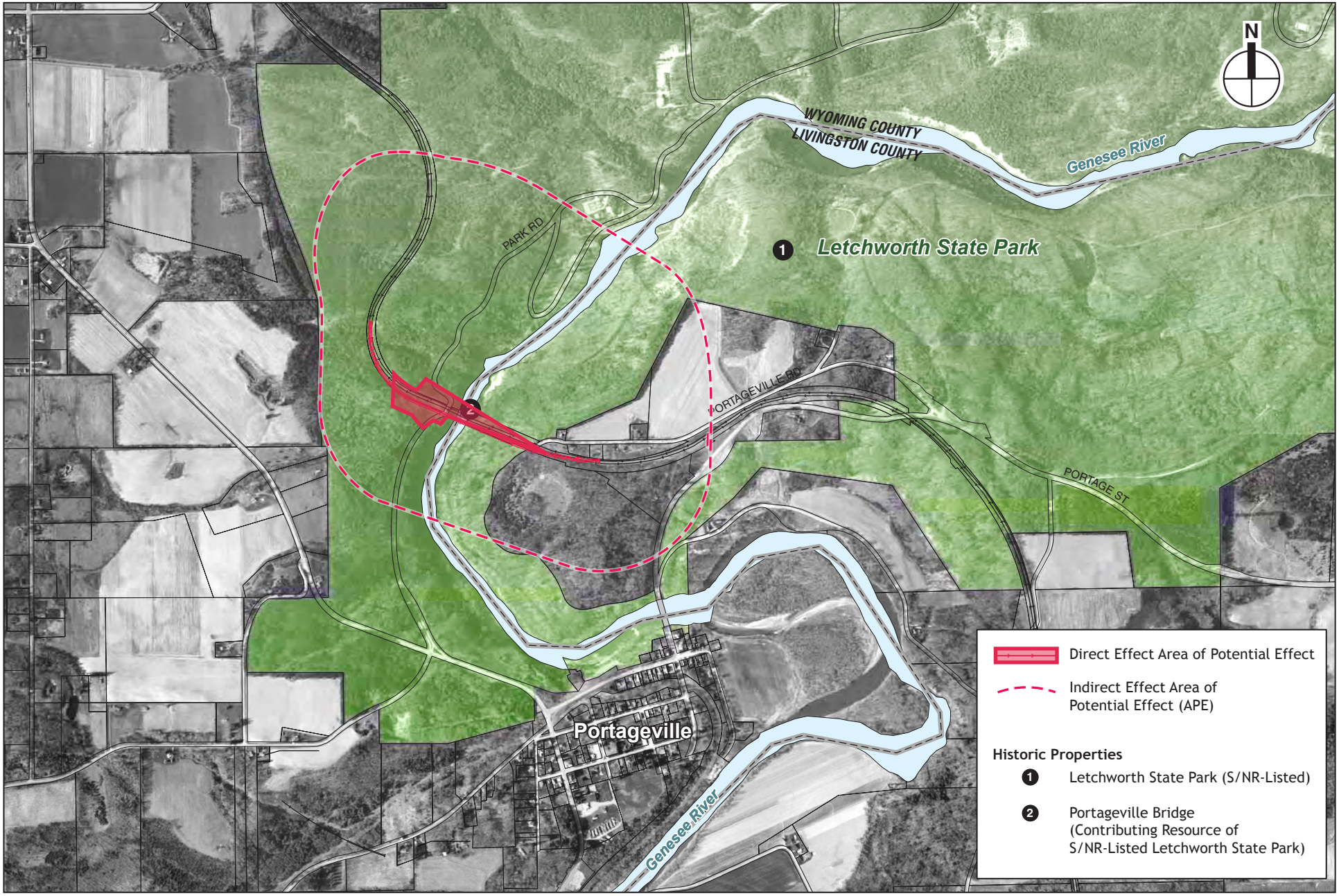
Source: New York State Rail Plan, 2009

PORTAGEVILLE BRIDGE

Project Location
Exhibit A

EXHIBIT B
AREA OF POTENTIAL EFFECT AND
LOCATIONS OF HISTORIC PROPERTIES

2.10.14



0 1000 2000 FEET

SCALE

PORTAGEVILLE BRIDGE

Area of Potential Effect and Locations of Historic Properties

Exhibit B

EXHIBIT C
CONSULTING PARTIES

EXHIBIT C
SECTION 106 CONSULTING PARTIES

NAME	ADDRESS	PHONE/EMAIL
Landmark Society of Western New York Ms. Caitlin Meives, Preservation planner	133 S. Fitzhugh Street Rochester, NY 14608	Phone: (585)-546-7029 ext. 27 Fax: (585)-546-4788 cmeives@landmarksociety.org
Friends of the Genesee Valley Greenway Edward Holmes Joan Schumaker	Box 42 Mt. Morris, NY 14510	Phone:(585)-658-2569 fogvg@frontiernet.net
HistoricBridges.Org Nathan Holth	12534 Houghton Drive DeWitt, MI 48820	Phone: (269)-290-2593 nathan@historicbridges.org
Seneca Nation of Indians Melissa Bach Tribal Historic Preservation Officer (THPO) Jay Toth, Tribal Archaeologist	90 O:hi'yoh Way Salamanca, NY 14779	Phone: (716) 945-1790, ext. 3580 Emergency: (716) 244-1735 Melissa.bach@sni.org Jay.toth@sni.org
Tonawanda Seneca Nation Chief Darwin Hill	Tonawanda Seneca Nation Office 7027 Meadville Road Basom, New York 14013	Phone: (716)-542-4244 Fax:(716)- 542-4008 tonseneca@aol.com
Tuscarora Nation Bryan Printup Tuscarora Environment Office	5226 E Walmore Road Tuscarora Nation Lewiston, NY 14092	Phone:(716)-264-6011, ext. 103 bprintup@hetf.org
NYS Office of Park, Recreation and Historic Preservation-State Parks Dave Herring, Capital Facilities Manager	One Letchworth State Park Castile, NY 14427	Phone 585-493-3602 Mobile 585-322-5671 Fax 585-493-5272 David.herring@parks.ny.gov

EXHIBIT D
AVOIDANCE PLAN

Norfolk Southern Corporation
1200 Peachtree Street, NE
Atlanta, GA 30309-3579
Phone: (404) 529-1408

J. N. Carter, Jr.
Chief Engineer
Bridges and Structures

K. G. Hauschildt, PE
Engineer Structures
Kevin.Hauschildt@nscorp.com
(404) 527-2529

Portageville, NY: Bridge No. SR-361.66 - Avoidance Plan

July 23, 2012
File: BR0027339 KGH

The avoidance plan is designed for the protection of the Cascade House Historic Site. The provenience data obtained from the Phase II study prepared by Hartgen Archeological Associates, Inc. indicate the cultural deposits are located along a fairly narrow construction easement corridor located parallel to the railroad tracks. The foundation remains of the Cascade House (Feature 1) and most of the surrounding property lie outside the proposed APE. Although the cultural deposits encountered within the construction easement are considered to be part of the National Register Eligible Cascade House Historic Site, a sufficient sample of historic material was obtained from the Phase II shovel test and unit excavations. Any additional excavations would result in the accumulation of similar material. Individually, the cultural deposits are not considered National Register Eligible, and no further investigation is warranted. The Office of Parks, Recreation, and Historic Preservation has concurred with this recommendation.

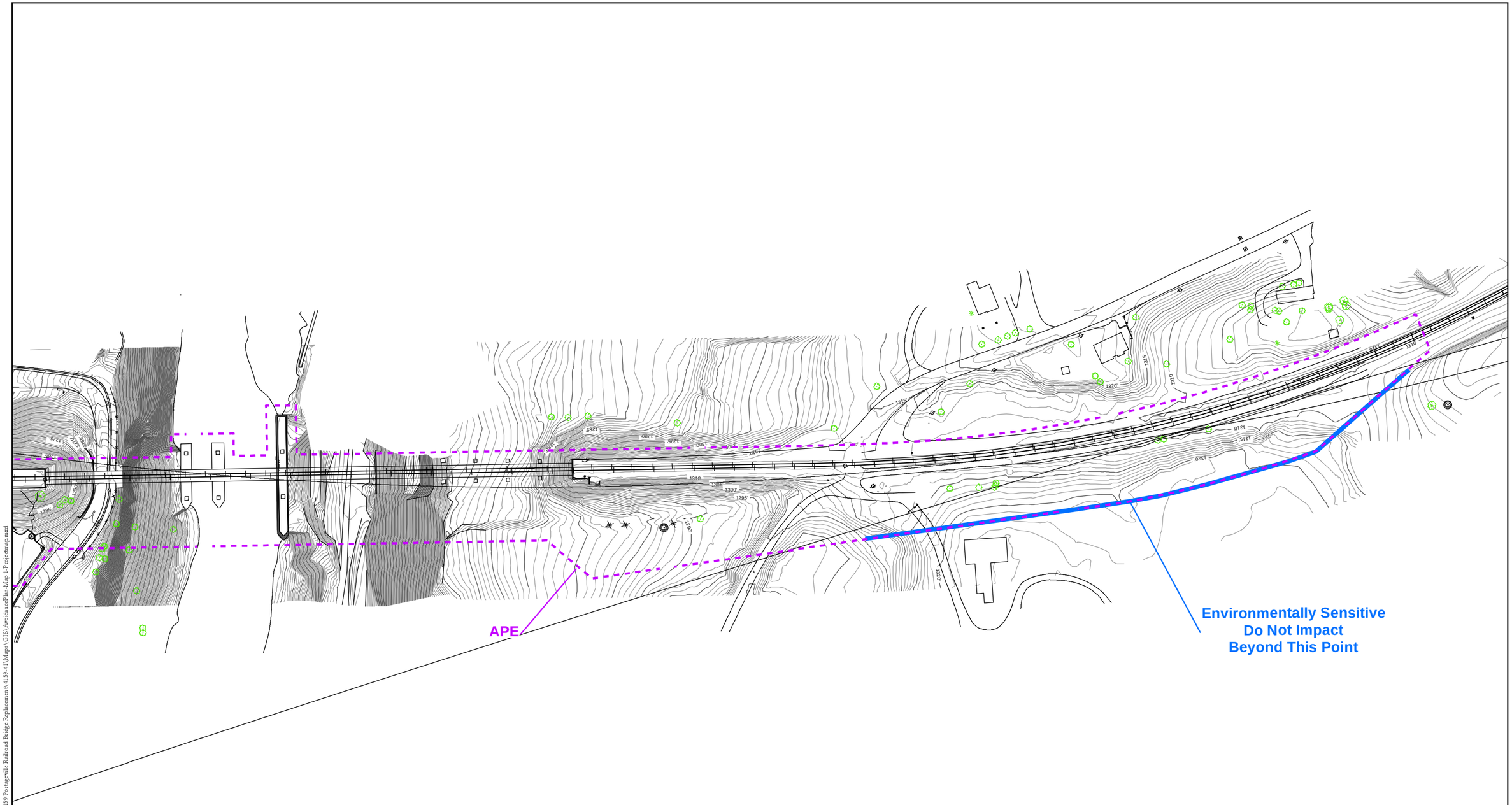
The archeologically sensitive area located beyond the proposed construction footprint will remain undisturbed by the project and identified on the site plans as **"Environmentally Sensitive Do Not Impact"** (Map 1). The site limits have been marked in the field by an archeologist from Hartgen Archeological Associates. The following measures will be undertaken to prevent impacts to the archeologically sensitive areas located beyond the construction corridor and after construction.

- Prior to construction, orange construction fencing will be placed along the perimeter of the construction limits marked in the field and indicated on the site plans.
- The property south of the construction limits is located outside the APE and privately owned by others. As indicated above, this area will be protected during construction.
- If future development is proposed for the environmentally sensitive sections of the property, it will need approval from OPRHP and may require further archeological investigation.

With the protection of the Cascade House Historic Site during project construction, no further archeological investigation is recommended by Hartgen Archeological Associates for the proposed Norfolk Southern Portage Railroad bridge replacement project.

J. N. Carter, Jr. /KGH

J. N. Carter, Jr.



N

75 0 75 150 Feet

20 0 20 40 Meters

Note: Contour interval is 5 feet.

Legend

- Limits of Disturbance (APE)
- Site Limit

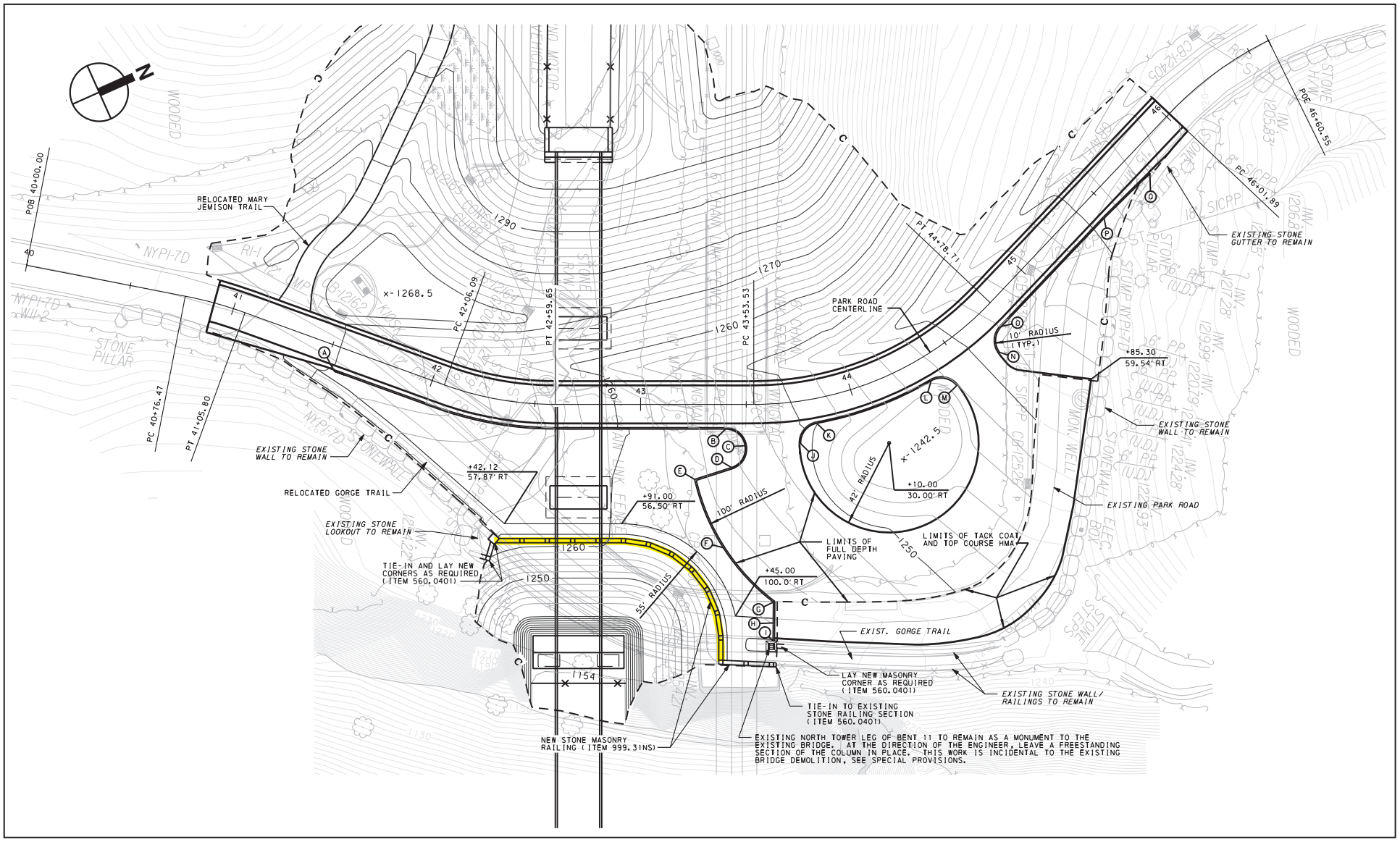
Phase II Project Map Overview
(Modjeski and Masters 2010, Hartgen 2011)

HARTGEN
archeological associates inc

Map 1

ES June 14, 2012 R:\Active Projects\4159 Portageville Railroad Bridge Replacement\4159-41\Maps\GIS\AvoidancePlan\Map 1-Projectmap.mxd

EXHIBIT E
AREA OF RELOCATED GORGE TRAIL



Relocated Gorge Trail Wall

0 80 FEET
SCALE

Area of Relocated Gorge Trail
Figure E

Appendix C: Historic and Cultural Resources

C-6 Letchworth State Park National Register Registration Form

NPS Form 10-900
(Oct. 1990)

OMB No. 10024-0018

United States Department of the Interior
National Park Service

National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in *How to Complete the National Register of Historic Places Registration Form* (National Register Bulletin 16A). Complete each item by marking "x" in the appropriate box or by entering the information requested. If an item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions. Place additional entries and narrative items on continuation sheets (NPS Form 10-900a). Use a typewriter, word processor, or computer to complete all items.

1. Name of Property

historic name Letchworth State Park

other names/site number Glen Iris, Letchworth Park

2. Location

street & number Genesee River Gorge between Portageville and Mt.Morris [ ] not for publication

city or town Genesee Falls, Castile, Mt. Morris, Leicester, Portage [ ] vicinity

state New York code NY county Wyoming/Livingston code 121/ 051 zip code 14427

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended, I hereby certify that this [x] nomination [ ] request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements as set forth in 36 CFR Part 60. In my opinion, the property [x] meets [ ] does not meet the National Register criteria. I recommend that this property be considered significant [x] nationally [x] statewide [x] locally. ([ ] see continuation sheet for additional comments.)

Michael Carey, SHPO 6/16/03

Signature of certifying official/Title Date

New York State Office of Parks, Recreation & Historic Preservation
State or Federal agency and bureau

In my opinion, the property [ ] meets [ ] does not meet the National Register criteria. ([ ] see continuation sheet for additional comments.)

Signature of certifying official/Title Date

State or Federal agency and bureau

4. National Park Service Certification

I hereby certify that the property is:

[ ] entered in the National Register
[ ]see continuation sheet
[ ] determined eligible for the National Register
[ ] see continuation sheet
[ ] determined not eligible for the National Register

[ ] removed from the National Register

[ ] other (explain) _____

Signature of the Keeper date of action

Letchworth State Park
Name of Property

Wyoming and Livingston Counties, New York
County and State

5. Classification

Ownership of Property
(check as many boxes as apply)

[x] private
[ ] public-local
[x] public-State
[x] public-Federal

Category of Property
(Check only one box)

[ ] building(s)
[x] district
[ ] site
[ ] structure
[ ] object

Number of Resources within Property
(Do not include previously listed resources in the count)

Contributing	Non-contributing	
101	116	buildings
62	8	sites
21	4	structures
154	9	objects
338	**137**	**TOTAL**

Name of related multiple property listing
(Enter "N/A" if property is not part of a multiple property listing)

N/A

Number of contributing resources previously listed in the National Register

N/A

6. Function or Use

Historic Functions
(enter categories from instructions)

RECREATION AND CULTURE/outdoor recreation
TRANSPORTATION/ rail related, water related
LANDSCAPE/park, DOMESTIC/single dwelling, camp
AGRICULTURE/SUBSISTENCE/ agricultural field, horticultural facility, INDUSTRY/PROCESSING/ EXTRACTION/ waterworks, manufacturing facility

Current Functions
(Enter categories from instructions)

RECREATION and CULTURE/outdoor recreation
LANDSCAPE/ park, RECREATION AND CULTURE/ museum, FUNERARY/ cemetery, burials, TRANSPORTATION/ rail-related, road-related, pedestrian-related, INDUSTRY/ PROCESSING/EXTRACTION/waterworks, DOMESTIC/ camp

7. Description

Architectural Classification
(Enter categories from instructions)

MID-19th CENTURY- Greek Revival, Exotic Revival
LATE VICTORIAN- Italianate
LATE 19th and 20th CENTURY REVIVALS- Colonial Revival
LATE 19th and EARLY 20th CENTURY MOVEMENTS- Bungalow/Craftsman, OTHER- Naturalistic

Materials
(Enter categories from instructions)

foundation stone
walls shingle, log, shake, stone
roof asbestos shingles
other

Narrative Description
(Describe the historic and current condition of the property on one or more continuation sheets)

7. Narrative Description

Introduction

Letchworth Gorge, the "Grand Canyon of the East," is the 22-mile section of the Genesee River between Portageville and Mt. Morris in Wyoming and Livingston Counties, New York. Now under state protection as Letchworth State Park, the 14,345-acre park encompasses land on both sides of the river. The park surrounds a portion of the river whose meandering course has been deeply incised into the plateau since the end of the Ice Age, producing remarkably narrow, winding bedrock canyons at either end with nearly vertical walls. The upper canyon at the Portageville end contains three major waterfalls, and the Mt. Morris Highbanks canyon at the lower end is the site of the Mt. Morris flood-control dam. In the central section, the river occupies a preglacial valley with high but gently sloping sides; and meanders over a moderately broad flood plain. Most of the developed park land is on the west side of the river, and most of the historic buildings are concentrated in the south end near the falls. The park is generally wooded with winding roads and hilly terrain. Most park buildings are located near sites which provide scenic views of the gorge.

The park land is extremely rich in historical and cultural resources, including, but not limited to, natural features, resources associated with Native American occupation, resources associated with early European settlement communities and early transportation, features associated with the William Pryor Letchworth estate, and features associated with two eras of park development under the American Scenic and Historic Preservation Society and New York State Council of Parks.

The park includes a great variety of resource types, such as natural resources, archaeological sites, industrial resources, architectural resources, designed landscapes and landscape features, railroad related resources, canal related resources, and recreational resources. All of these contribute toward making Letchworth State Park popular with the over one million visitors who visit the park annually. The long and rich history written on this land can still be seen by those who take the time to look for it in the trails, buildings, roads, objects, structures, and sites which all contribute to the importance of this park.

Geological Features

The history of Letchworth State Park begins with the development of the Genesee River Gorge. The flow of the river attracted settlers to this area; first the Native Americans, then the European Americans. The dramatic scenery drew William Letchworth to the falls of the river and led to his decision to build his home here. The beauty of the falls, threatened by a proposed hydro-electric dam, drove William Letchworth to give the land to the State of New York and the American Scenic and Historic Preservation Society. The scenic landscape of the river gorge has brought millions of visitors to the park over the last ninety years.

Geologists find Letchworth State Park of interest because of the clearly defined rock formations visible on the sides of the gorge. The most visible formation, called the Portage Group, was named by Dr. James Hall for the

area near the town of Portage. This particular formation is very common in the Northeast, but it can most clearly be viewed here at the Genesee River. The formation is made up of layers of sediment deposited in the Devonian Period, approximately 350 million years ago.

During the Late Devonian period Europe and the microcontinent of Avalonia (now Eastern New England) collided with northeastern North America. The force of the collision heaved and buckled the earth's crust resulting in the Acadian Orogeny (mountain building event)- the climax of mountain building that formed the Northern Appalachian Mountains. The Appalachians at this time were as lofty or majestic as any peak in the Rocky, Alp, or Himalayan Mountains. West of the newly forming mountains that occupied Eastern New York and New England, was an ocean that stretched across the remainder of New York State. This ocean was relatively deep (several hundred feet or more) in western New York but shallowed eastward toward the ancient shoreline. Rivers flowing west off the mountains were charged with sediment derived from the erosion of these mountains. Once the rivers reached the sea they deposited their loads of sediment and soon a large delta began to form known as the Catskill Delta. Early in the Late Devonian the swampy, subaerial part of the delta was located adjacent to the Acadian landmass in the present day Catskill mountain region. Therefore western New York, at this time, was the site of a deep basin far offshore. Into this deep water the Genesee Group, Sonyea Group, and the Rhinestreet Black Shale of the West Falls Group were deposited. These rocks are black or dark in color due to the organic matter contained within them and frequently emit a bituminous or "oily" odor. Furthermore they are fine grade shales which means they were deposited in quiet, still, waters. These rock units yield relatively few fossils save for a few floating or swimming types. The rock characteristics described above indicate deposition in a deep, anoxic (oxygen starved) basin. This is how the rock formations now exposed at the north end of Letchworth State Park formed.

As time went on even more sediment was brought in from the east. The result was a slow and gradual shift of the delta westward across New York State. As the delta expanded, the deep basin that had for so long existed in western New York was replaced by successively shallower theaters of sedimentation. Therefore the strata immediately above the Rhinestreet (Gardeau, Nunda, Java, Canaseraga) were deposited on a continental or delta slope.

The next step in the evolution of the Genesee Valley was the uplifting of the continent which raised the ocean bottom out of the water. This uplift was the result of a succession of very slow and gradual elevations and subsidences of the earth's crust, the net effect of which was to leave the land at an elevation of thousands of feet above sea level. As soon as the modern New York State became dry land, atmospheric and aqueous factors attacked it and began to erode the surface, tending to wear it down to an approximate plain at sea level. Other mountain building forces tilted and cracked the rocks forming deep straight line cracks called joints. When pressures move the rocks along these joints, they become faults and energy is released in the form of earthquakes. Faults can be seen at the end of the trail at Lee's Landing and in the opposite bank from Tea Table Picnic Area. As drainage patterns develop on the eroding landscape, the moving water follows the path of least resistance, often pulling the rock away along the joints and leaving the faces of waterfalls and cliffs with straight flat surfaces as if cut by giant saws.

The change in the course of the stream occurred at or prior to the comparatively recent Glacial Epoch and consisted of a depression of the earth's crust toward the north, which made the waters which formerly flowed southward flow northward.

Over the last two million years of history alternating cold periods known as the Ice Age have interrupted and changed the drainage patterns of the Genesee River Valley. Continental ice sheets scoured across this area and may have been more than a mile thick. Before the Ice, the ancient Genesee River did not include any of its route through present day Letchworth State Park. The river is believed to have occupied a valley east of the park which is now the home of Keshequa Creek between Nunda and Tuscarora. The ancient Genesee emptied into an "Ontarian River" by way of a valley now known as Irondequoit Bay.

Approximately 50,000 to 100,000 years ago snow fields began accumulating in central Quebec. Eventually the lower portion of the snow "pile" was changed to ice by the pressure of the overlying material. The Wisconsinan glacier had formed. Due to the downwardly directed pressure at the center of the source area, the ice began to flow outward in all directions. By approximately 20,000 years ago the ice reached its maximum extent and, advancing no longer, began to melt back. In it southward advance the erosive power of the ice gouged out the Lake Erie and Ontario basins, which filled with water upon glacial melting.

Lobes or tongues of ice extending south from the main glacial body first invaded valleys in the plateau that were aligned in more or less a north-south direction. The erosion by these initial lobes of ice caused these valleys to be slightly widened and deepened. This permitted more ice to funnel into the valley causing more erosion. Eventually the main glacier arrived to erode these valleys even more, producing deep U-shaped troughs. The western branch of the preglacial Genesee Valley from Sonyea to Portageville and the eastern branch from Sonyea to Dansville were thus greatly modified.

When the ice moved from the north some north-south valleys were deepened and other east-west valleys were plowed over. As the ice melted away, the debris that the ice carried was dropped in various ways forming hills and ridges and sometimes burying entire river valleys. These huge debris piles were called moraines, usually formed when the ice remained in a fixed position for a long time in response to steady climatic conditions. As melt water lakes drained and the Genesee re-established its route it was sometimes forced to follow different paths. The resultant landscape was left blanketed with voluminous heaps of sand and gravel. This process was repeated four different times and leaves a maze of valleys or what used to be valleys that the river used before, still uses, or is now using for the first time. The Wisconsinan glaciation changed the path of the Genesee from the Keshequa Creek bed to the current route through the modern Genesee Valley. Ice recession from the large gravel and sand deposit, left it behind as a plug, blocking the pre-glacial Genesee Valley between Portageville and Oakland. This formed the Portageville Moraine, an irregular deposit of knolls and hills resembling large "eggs in a basket." The modern Genesee River follows some of its earlier route, while in other areas it is still carving its "new" river bed through the rocks.

The oldest valleys of the Genesee can be recognized by their greater width and meandering river course such as upstream of Portageville or the valley past Geneseo. Some smaller re-occupied valleys have steeper, more

closely set banks that restrict the wandering of the river such as those found at Smokey Hollow, Gardeau, St. Helena, or Lee's Landing. One such middle-sized valley may have been bisected by the river between Middle and Upper Falls; the bottom of this valley being exposed on the east side of the river in the landslide downstream from the Middle Falls. The youngest valleys are characterized by rapids, waterfalls, and sheer cliffs.

The Portage Canyon with its three falls, the Big Bend Gorge, the Mt. Morris Canyon or Highbanks with its mile long entrenched meander known as the Hogsback, and the Rochester Falls and gorge are all recent detours carved by the melting of the most recent ice mass. The multitude of waterfalls across the state are likewise recent ice-age products created by tributaries left hanging above deepened valleys. The three falls were probably formed when the river formed temporary meltwater lakes downstream that controlled the base level of erosion for each falls. The upper falls formed when the river spilled over an escarpment bordering the highest lake. When they had retreated for some distance the lake level dropped in response to the opening of a new, lower outlet; and the middle falls were initiated at the scarp where the upper falls had been in the first place. Both upper and middle falls then receded at essentially the same rate until the lake level dropped again and the lower falls formed. The controlling lake possibly occupied the broad valley in the central section of the park.

The rocks near the present day dam are all shale, formed from fine sediments, like clay, deposited in calm and relatively deep water. Some of these shales both above and below the dam are very blackish in color and have fuel-oil odor when broken due to the organic materials that the clay contained. In essence, these could be considered low-grade "oil-shales." The softest shale in all the park with the light olive, bluish-gray cast is sandwiched between the dark sediments and are the very layers that support the sides of the dam. At the other end of the park are more recent sediments that are alternate deposits of fine sand or silt that when formed into rock may be called siltstones. Above the Upper Falls, the watery environment was both shallow and more turbulent resulting in massive bands of sandstone. The hardest rock in all the park is exposed along the gorge trail by the High Bridge. This same layer can be seen at the top of the cliffs at Inspiration Point and opposite the Archery Field Overlook near the Castile entrance. This sandstone layer was quarried south of Portageville where it was called the "portage bluestone" for its decidedly bluish hue when freshly broken. The rock weathers to a yellowish tan where exposed along the cliffs.

Vegetation

Prior to Euro-American settlement, the region was covered with beech-maple and oak-hickory forests, as well as some hemlock-hardwoods. Oak-hickory and maple-beech forests occurred along better drained areas. The uplands of southwestern Livingston County were covered with maple, oak, hickory, ash, black walnut, and basswood. Along steeper terrains were the hard maple, beech, yellow birch, and hickory. Softer maples. elm, and sycamore were more prevalent along the flatter lands by the Genesee River towards the northern portion of the project area. Hemlock thrived in wet places, and white pine was also common. By the twentieth century, farm woodlands consisted of second and third growth trees of the original forest species.

The vegetation in the park today is extremely varied. Some trees and shrubs are natural to the area, others were brought and planted by the people who settled the Genesee River Valley. The American Scenic and Historic

Preservation Society established an arboretum in the park in the mid-1910s, which brought other species to the park lands. The low lying areas are covered with white cedar, alder, slippery and American elms, hazel alder, swamp azalea, and periwinkle. The upper slopes and woodlands have numerous species, including Jersey tea, yew, and red and white pine. Other common vegetation is larch, hemlock, juniper, red, sugar, and silver maple, birch, hickory, dogwood, cherry, hawthorn, beech, ash, locust, black walnut, tulip trees, oaks, poplar, and willows. Fruit trees and shrubs including apple, plum, cherry, peach, black currant, blueberry, and crab apple are common throughout the park. These are the remains of the various orchards left by the settlers in the area. The American Scenic and Historic Preservation Society planted blocks of spruce, firs, pine, maple, and catalpa, as well as scattered plantings of laurel, rhododendron, elm, forsythia, honeysuckle, clematis, chokeberry, and ivy along roads and guard rails to make them look more naturalistic.

Archaeology

Letchworth State Park is an archaeologically sensitive area. Recorded prehistoric site locations indicate high sensitivity areas at the south end of the park east of the Genesee River near the Middle and Lower Falls; at the north end of the park east of the Mt. Morris dam; and along broad plateaus overlooking the west bank of the Genesee. Known sites represent only a sample of potential archaeological resources associated with Native American occupation of the park prior to white settlement. In addition, the presence of previously undocumented archaeological remains associated with white settlement is indicated by nineteenth century maps and primary source material. New archaeological remains identified in the future would be significant if they retain undisturbed configurations of cultural features, soil strata, or artifact distributions bearing the potential to address important research questions pertaining to the pre-history or history of the area.

The documented archaeology of Letchworth State Park is represented by eight prehistoric sites and eight historic sites contained in the archaeological files of the New York State Office of Parks, Recreation, and Historic Preservation. Archaeological investigations have been conducted at several locations within the park as part of cultural resource surveys initiated as a result of proposed construction related to recreational enhancements, highway projects, and a new storage facility. Archaeological resources were also addressed in a Draft Environmental Impact Statement prepared for the Mt. Morris Flood Control Project. However, there has never been a comprehensive reconnaissance survey of archaeological resources for the entire park.

Though human habitation of western New York commenced ca. 8500-9000 B.C., known archaeological sites in Letchworth State Park document only the latter period of prehistory. Archaeological evidence of aboriginal occupation in the park begins ca. 1000 B.C., and extends through the eighteenth century, suggesting continuous occupation from the Early Woodland through the Historic Seneca periods. The majority of sites are villages, representing long-term occupation by a series of extended family groups united by complex religious, political, and social organizations. Two recorded locations within the park are identified as camp sites, short-term or seasonal occupations by small groups, generally associated with a limited range of activities.

The earliest documented site associated with what is now Letchworth State Park is a village found just outside the boundaries of the park, on the eastern side of the river opposite the Highbanks Recreation Area. While the

site of the village, known as the Hendershot Road site, was not found inside the modern park boundaries, the extent of the village would likely have spread into park lands and included access to the Genesee River. Arthur C. Parker recorded Livingston County Site No. 54 as the largest group of camp sites in the Genesee Valley. Located in the vicinity of Squawkie Hill near the North Park Entrance, this multi-component site represents recurrent occupations over a broad span of prehistory. Parker Site No. 54 also designates the village of Squawkie Hill and two nearby mounds which contained platform pipes, copper axes, stone projectile points, discoid shell beads, and native pearl beads in association with human burials. A middle Woodland/Hopewellian affiliation (ca. 140 A.D. to 500 A.D.) is suggested for these features. In the village, a range of subsistence activities was represented by the discovery of drills, scrapers, bell pestles, gouges, and rough stone tools. A 1930s Rochester Museum excavation at a second location mapped to the east (RMSC Nda 1-1) also recovered evidence of a Middle Woodland occupation. This component of the Squawkie Hill site has since been destroyed. Parker recorded the northeast side of Squawkie Hill as the location of a site known as "White Woman's spring" (Livingston Co. No. 55), reputedly used by Mary Jemison.

In the central section of Letchworth, a pre-Iroquoian village site (Parker Livingston Co. No. 61) was located on a bluff overlooking the west bank of the Genesee. To the south, the St. Helena site, a Late Woodland/Early Owasco village, was located on the alluvial floodplain west of the Genesee, north of the Gardeau Overlook. Excavated by the Rochester Museum in the 1930s, the site has since been partially or totally destroyed. The Gardeau Flats site (UB 511), referenced by Morgan, Beauchamp, and Parker, was a Seneca village located along the Genesee River bottom in the Town of Castile. The location was subsequently part of the Gardeau Reservation.

Near the south end of the park, an upland site (Follett 346A, Deo-wes-ta #1) located south of the Lower Falls has been identified as a Late Woodland/Historic Iroquois village. A village site (Follett 346A, Deo-wes-ta #2) east of the Middle Falls at the south end of the park, and a camp site (Follett 374, Tallman Road) south of Mt. Morris dam at the north end of the park are of unknown age and cultural affiliation.

The New York State Office of Parks, Recreation, and Historic Preservation archaeological site files also document locations of eight historic sites within Letchworth Park. The Portage-Genesee site is located just inside the south park boundary north of Portageville. Artifacts recovered from the site include bottle and window glass, a kaolin pipe bowl fragment, and a variety of historic ceramics indicating a mid-nineteenth century period of occupation.

In 1986, the Rochester Museum conducted Stage IB and II archaeological survey and testing of the Letchworth Park Schoolhouse. Located north of the cemetery in the vicinity of the Middle Falls, the schoolhouse was built by the Town of Genesee Falls for School District #2 in 1873-74. The building was razed in 1947. Subsurface remains consist of incomplete foundation walls overlain by disturbed fill deposits.

The site of the hamlet of Gibsonville (ca. 1792-1937) is located on the west side of the Genesee River on both sides of the Silver Lake outlet in the northern section of the park. Settlement was established here ca. 1792, with the construction of a saw mill by Ebenezer Allen. By the 1870s, a paper mill and saw mill supported a

community of approximately 20 dwellings. With the destruction by fire of the paper mill in 1894, Gibsonville entered a period of economic decline, culminating with the closing of the local school in 1930. Remaining buildings were cleared from the location, and the site was occupied by a Civilian Conservation Corps camp from 1933 to 1937. The former village of St. Helena, located on the Gardeau Flats, was settled and developed during the same period as Gibsonville. The hamlet was occupied until the 1950s, when residents were forced to leave due to the potential flood plain created by the Mt. Morris Dam. While visible remnants of the settlement were washed away during Hurricane Agnes in 1972, it is likely that some archeological remains are still extant.

Excavation at the Council House Grounds, located on the west side of the river near the Middle Falls, hold information on the former design of the area during the late nineteenth century. Research has been carried out to determine the location of earlier structures and return the grounds to their former appearance. The site of a mid-nineteenth century grist mill and mill race has also been found near the Upper Falls on the east side of the river, near the former hamlet of Portage. The site of Chestnut Lawn farm, on the west bank of the river near the Lower Falls, was home to Reuben Jones, one of the earliest settlers in the Genesee Valley. The property was later used as a dairy farm by William Letchworth. The buildings were dismantled in the 1930s. The nearby land was also used for the Lower Falls Civilian Conservation Corps Camp from 1937-1941.

Potential sites for future excavation can be found the length of the park. The site of Whaley's sawmill, located between St. Helena and Wolf Creek, retains some visible evidence of its presence. A chimney, a few building foundations, and a trail to the river all remain as evidence of the importance of the lumber and mill industry on the Genesee River during the early to mid-19th century.. Other potential archeological sites around the park include the former Cascade Hotel, located near the Portage High Bridge in Livingston County; the sites of the four Civilian Conservation Corps camps at Big Bend, St. Helena, Gibsonville, and the Lower Falls; the site of Hornby Lodge near the Genesee Valley Canal route along the gorge; and the site of the former bridge over the river at the Middle Falls.

Built Features

The Valley's topography determined development patterns during the Native American and European settlement eras. Small aboriginal villages were scattered along the length of the river above and below the falls. Towns and hamlets were later built along the river flats above and below the waterfalls, particularly in areas where the Genesee River could be forded. Not until the power of the falls was needed to drive mills were homes and businesses built along these cliffs. This pattern allowed the Genesee Valley Gorge to remain unspoiled until the middle part of the nineteenth century. The effects of lumbering are no longer visible on the gorge walls thanks to the work of William Letchworth and his determination to see the valley in its natural state. Prehistoric archaeological remains can be found at either end of the park, and at the flats below the lower falls. The historic remains of villages, mills, and homes are found in the same areas.

From the mid-nineteenth to the mid-twentieth century Letchworth State Park has been a canvas for the designs of landscape architects. Evidence of their work can still be seen in the layout of trails and roads, the screening of buildings, and of course the planting of trees and shrubs around prominent structures in the park. The designs of

William Webster in the nineteenth and the Civilian Conservation Corps architects in the twentieth century are still the basis for many of the resources still used and admired in the park today.

The period of significance for Letchworth State Park runs from 1000 BC through 1950, beginning with the occupation of the lands by the Early Woodland people and later the Seneca Nation, through the settlement era, the development of the land by William Letchworth, and the administration of the park by the American Scenic and Historic Preservation Society and the New York State Council of Parks.

Methodology

To facilitate the narrative and graphic description of such a large park it has been divided into smaller developed sections, or areas. For the purposes of the nomination 40 areas have been defined. Area numbers begin with the number 10 and run through 49. Narrative descriptions of the areas run from south to north, first on the west side, then on the east side of the park. Linear areas, such as the Erie Railroad Corridor and the Genesee Valley Canal bed have been described as one area. Resource groups such as trails and roads that are not limited to one geographic area have been described together. The resource list follows the same listing strategy and includes the area number seen on Map A, and the building number currently used by the park administration. Only buildings have individual numbers; objects, structures, and sites have not been given numbers on the maps or on the resource list.

Letchworth State Park has a wide variety of buildings, sites, structures, and objects. Resources were counted as individually contributing or non-contributing in most cases. This formula is used with stone picnic tables, fireplaces, benches, and water fountains; groups of memorial trees; and historical markers. However, park wide resources, including trails, roads, stone walls, and overlooks were each counted as a resource system and only counted as one structure each. This allows the document to focus attention on the resources that might easily go unnoticed and therefore are the most at risk during any future changes to the park. There are 101 contributing buildings, 21 contributing structures, and 154 contributing objects, and 62 contributing sites within Letchworth State Park. Non-contributing resources number 137, many due to age only. Directional references, eg. north, south, east, and west, are in relation to the Genesee River, which travels in a generally south- north direction. Due to the extensive curves in the river throughout its course, the geographic directions are standardized as though the river was completely straight.

Area Descriptions

10- Portageville Entrance Area Description

The Portageville Entrance Area is the southernmost area in the park. It is located at the intersection of the main park road and routes 19A and 436. The entrance has only scattered trees, although the boundary around the area is heavily wooded. By the contact station there are three lanes for traffic. One was heading south, one used for stopping at the station, and the other moving north around the station.

There is one building in the entrance area, and it is non-contributing due to age only. The area consists of the **Contact Station** (1), and two **entrance signs**. The signs are located on routes 19A and 436, one facing south, the other facing north. Both signs read "Letchworth State Park Entrance" and are metal set in a fieldstone base. Both lead the visitor to the main park road and the contact station, built in 1959. It is a one-story stone and wood building with an asphalt-shingle gable roof. It is built in two sections and the roofline stretches over both sections and the one lane of road that runs between them.

11- Upper/Middle Falls Picnic Area Description

The Upper/Middle Falls Picnic Area is defined by a number of natural and man-made boundaries. To the east the grounds are bordered by a walking trail, a stone wall, and the Genesee River, with the Portage High Bridge at the southern end. To the north and west the picnic area is bounded by groves of pine and deciduous trees. The area is naturally subdivided into two sections, the Upper Falls and Middle Falls sections. The Middle Falls section is the northeastern end of the area, and the topography is flat and relatively clear, with various species of trees lightly scattered over the area. Part of the section comprises a large parking lot, with the picnic area access road leading down the west side of the area. The Upper Falls section is across the road from the Middle Falls section and is above on a natural plateau. It is more secluded and can be reached by two sets of stone steps from the road and the Middle Falls section of this area. At the south side the slope gentles out and the Upper Falls section can be easily reached without the aid of steps.

There are four contributing and one non-contributing buildings in the Upper/Middle Falls Picnic Area. The **Middle Falls Comfort Station** (3), built in 1913, is a one-story fieldstone building with square paneled wood columns and an asphalt-shingled hip roof. The **Upper Falls Comfort Station** (2), built 1929, is a one-story frame building with cedar shingle siding and an asphalt-shingled hip roof. Two buildings in the area were built in 1930, the **Upper Falls Shelter** (5) and the **Middle Falls Picnic Shelter** (6). Both are rectangular plan one-story frame shelters with asphalt shingled roofs. The gable-roofed log-sided Middle Falls Picnic Shelter is enclosed on one end with a stone fireplace, six eight-over-eight double-hung windows, and fourteen wooden tables. The Upper Falls Shelter is an open-sided hipped roof building with square stone pillars and exposed rafter tails. The one non-contributing building is the **Upper Falls Food Concession** (4), built in 1969. It is a one-story hipped roof building with an asphalt-shingled gable roof and stone veneer on the lower walls. The building is deemed non-contributing due to age only.

The Upper/Middle Falls Picnic Area also has several contributing objects, including at least four **stone water fountains** and approximately twenty-four **stone picnic tables** with benches of varying sizes in the upper picnic area of the grounds. A **stone wall** borders the gorge. Non-contributing picnic tables and playground equipment have also been added to the area.

At the south end of the area, the **Upper Falls Trail** leads under the **Portage Falls Bridge**. The trail is wooded to the west, with trees and overlooks spaced along the path to the east. A stone wall with variously designed overlooks runs along the trail on the east, or gorge, side. Most of the wall is stone construction along its length, while other sections are made up of stone piers with round wood logs for railings. The path is designed with

switchbacks to minimize the steepness of the climb. A single-arch **stone veneer bridge** built in 1931 crosses De-ge-wa-nus Creek and its ravine. It replaced an earlier wooden bridge which had stood at the same spot. The original trail was laid out by William Pryor Letchworth by 1907, and expanded by the men of the Civilian Conservation Corps between 1933 and 1937.The steps along the trail are stone slab or square wooden beam. One section of the path over a small ravine is a **concrete bridge** on stone pilings with metal pipe railing.

12- Glen Iris Area Description

The Glen Iris Area is located near the Middle Falls of the Genesee River. It is north of the Upper/Middle Falls Picnic Area. The landscape is flat and relatively clear of trees, except around the Glen Iris Inn. Historically this area was the formal and kitchen gardens for William P. Letchworth's Homestead, now the Glen Iris Inn. To the east the grounds are bordered by a stone wall above the river gorge with an overlook and a plaque dedicated to William Letchworth.. To the north and west the area is bounded by trees and a dramatic slope up of the landscape. To the south a line of trees separates the Glen Iris Grounds from a slope down to the Upper/Middle Falls Picnic Area. Large parking lots are located on both the east and west sides of the park road, and on both sides of the Glen Iris Inn and the Museum. Asphalt sidewalks are around the Inn, the Museum, and along the rim of the gorge. Below the stone wall and closer to the river is another walkway and stone wall, part of the Gorge Trail. The access road from the Upper/Middle Falls Picnic Area runs below the Glen Iris Inn and above the Gorge Trail.

There are four contributing buildings in the Glen Iris Area. The **Glen Iris Inn** (7), was William Letchworth's home and center of his Glen Iris estate. It is a two and three-story frame building in the Greek Revival style. It is now used as an Inn and dining facility for the park. To the north of the Glen Iris is a **goldfish pond**, a remnant of William Webster's romantic landscape design for William Letchworth. The pond has a historic fountain that is still functioning. The **William Pryor Letchworth Museum** (8) was built by the American Scenic and Historic Preservation Society in 1912 to house Letchworth's collection of Native American artifacts and books. It is a one-story fireproof stone building with a Colonial Revival entrance. The **Museum Comfort Station** (9) was built prior to 1941 and is a stone building with a gable roof just behind the museum itself. **Pinewood Lodge** (13), was built around a 1928 garage and turned into a seven-room motel in 1954. It is a one-story stone-faced building with asphalt-shingled gable on hip roof.

A handful of the trees around the area were planted during William Letchworth's tenancy. There are seven **memorial trees** on the grounds, planted by friends of Letchworth's in honor of their visits to the estate. Other trees were planted as part of Webster's landscape efforts around the Glen Iris. Much of Webster's design was removed by the American Scenic and Historic Preservation Society during their stewardship from 1911 to 1930. The trees and other plantings were in poor condition or were cumbersome to take care of, and therefore removed.

A number of paths lead off from the Glen Iris Area. To the north of the Glen Iris is a path to Pinewood Lodge, which is where William Letchworth had located a natural overlook of the Homestead, and the Middle and Upper Falls. On the east side of the area a path leads down to the Gorge Trail that follows along the river's edge

above the Middle Falls. Another path leads west from behind the museum to the Council House Grounds Area, and is a narrow stone path with steps up through the woods.

13- Council House Grounds Area Description

The Council House Grounds Area is located to the west of the Glen Iris Area. It is on a high wooded plateau, surrounded to the north, east, and west by groves of trees. The south end of the plateau is a parking lot with low stone walls. The land at the south end of the lot is also heavily wooded with pine and deciduous trees as it slopes downward. The access road for the Council House Grounds Area runs from the parking lot down below the west side of the plateau to the Main Park Road. The road is narrow and winding with low stone walls on the north side and stone drainage gutters. The Council House Grounds Area is relatively clear, with only five memorial trees present on the plateau. Asphalt paths run between the buildings and gravesite from the parking lot.

The Council House Grounds Area contains two buildings and one object. The **Caneadea Council House** (12) was built in the mid-eighteenth century and brought to Letchworth's estate from the Seneca village of Caneadea in 1871. It is a one-story log building with a wood-shingled gable roof. The **Nancy Jemison Cabin** (11) was built around 1800 by Mary Jemison for her daughter and was brought from the Gardeau Flats in 1880. The house is a one-story log cabin with a dirt floor and wood-shingled gable roof with an extension that becomes a porch. The **Mary Jemison Statue and Monument** were erected by Letchworth to mark the site of **Mary Jemison's grave**. The monument was erected in 1874, and the statue was added in 1910. The monument is a five-foot high marble base with a dedication to Mary Jemison on four sides. The statue of Mary Jemison is a seven-foot high bronze depiction of Mary as a young girl with a baby. Henry K. Bush-Brown, a well-known New York sculptor, designed the statue.

Two **footpaths** lead up to the Council House Grounds Area from Glen Iris Area. One starts behind the Pioneer and Indian Museum (previously discussed in the Glen Iris Area). The other begins at the Pinewood Lodge plateau, and was the original path laid out by William Letchworth as a carriage path and road when the Pinewood Lodge plateau was designed as a scenic overlook.

There are five **memorial trees** planted around the Council House Grounds. Visitors to the estate planted these during William Letchworth's time as owner. Native Americans who had participated in the Last Council Fire of the Genesee in 1872 planted two black walnuts trees and a white pine. Another white pine was planted by a descendant of Horatio Jones, a famous captive of the Seneca. The wife and children of one of Letchworth's closest friends, David Gray, planted a white oak in his honor after his unexpected death.

14- Lauterbrunnen Area Description

The Lauterbrunnen Area sits atop a plateau known by William Letchworth as "Eagle Hill." It is bounded on the east and south by a steep slope leading down to the Main Park Road and stone walls above the gorge. The slope is covered with deciduous trees, shielding the area from the road. A fence runs behind Lauterbrunnen itself,

above the edge of the ravine. To the north the Lauterbrunnen grounds are bounded by an access road and forest land on the other side. The access road forms a small island of land and trees in front of the house. To the south there is a rolling lawn with a few scattered trees. More wooded lands slopes down behind. The area is to the north of the Glen Iris Area and the Council House Grounds Area. A scattering of mature trees are found around the area, primarily near Lauterbrunnen.

There are four contributing and one non-contributing buildings around the Lauterbrunnen Area. The center of the area is **Lauterbrunnen** (15), a two-story frame residence built in the Swiss chalet style, with King's post trusses in the gables and sawtooth shingles around the doors and barge boards. The house was built in 1881 to enhance William Letchworth's romantic landscape. The **Park Residence** (16) was built ca. 1910 near Inspiration Point, and moved here in 1925 to house the foreman. It is a two-story bungalow residence with clapboard walls and an asphalt-shingled gable roof. The **Ice House** (23) is a small stone building with an asphalt-shingled gable roof and small wooden shingles in the gable ends, built ca. 1881. The **Lauterbrunnen Barn** (24) was built along with the house ca. 1881. It is a frame bank barn with board and batten exterior walls and asphalt-shingled gable roof. The double sliding barn doors are cross-paneled, and the roof points have finial ends. The **Lauterbrunnen Garage** (18) is a one-story frame building with an asphalt-shingled gable roof and clapboard siding. It was constructed in 1959. Evidence of earlier landscape design can be seen in the stone planter and small man-made stone pool near the house. Both were likely designed and built by William Webster during William Letchworth's ownership of this land.

Just to the northeast of the area center is the **Dragoon's Monument**, a stone obelisk dedicated to the 1st New York Dragoons, a Civil War unit which was mustered at Camp Williams, on the other side of the Genesee River. The unit was originally called the 136th New York Infantry. The monument was erected in 1903 near the Portage High Bridge and moved to this spot in 1916, when the land it originally stood on was threatened with development.

15- Commission House Area Description

To the west of the Lauterbrunnen Area and the South Maintenance Area stands the **Commission House** (17), built in 1937 by Attica Prison labor as a guesthouse for visitors to the Genesee Region Park Commission. The one and a half-story frame building is fashioned of rustic clapboards with a wood-shingled gable roof. The house is in the Rustic style, with a large stone fireplace and sleeping lofts above the main room. The side deck faces south with views of the Portage High Bridge in the distance. The land around the Commission House Area is heavily wooded, with a ravine dropping off to the south, and wooded hills sloping up to the north and west. A small parking lot for the house is set to the east of the building.

16- South Maintenance Area Description

The South Maintenance Area is located just to the west of the main park road. It is arranged around the access road through the maintenance section. The land at the rear of the structures on the east, north, and west sides the area is lightly to heavily wooded. The Commission House Area is to the west of the area. To the south are the

Lauterbrunnen Area and the curve of the area road. The South Maintenance Area has three rows of buildings, located on the west, east, and north sides of the area. The rows are made up of a combination of contributing and noncontributing buildings. There are no trees within the U-shape made up of maintenance buildings.

There are fifteen buildings in the South Maintenance Area, three of which are contributing. The **South Police Garage** (19), was built ca. 1920 as a one-story frame garage with clapboard walls and an asphalt-shingle gable roof. There are five sets of double doors on the front elevation. It is located slightly south of the rest of the buildings in the area. The **Storage Barn** (25), was built prior to the twentieth century. It is a one-story frame building with concrete-slab on grade, clapboard exterior walls, and an asphalt-shingle hip roof. The **Garage at the South Maintenance Area** (21A), was built in 1934 and is a one-story frame building with board and batten walls and an asphalt-shingle gable roof. It has eight garage doors on the front elevation.

Four buildings make up the west side of the maintenance compound. Moving from left right when facing the row, the first building is the **Electrician Aerial Bucket Building** (208), built in 1976, a one-story building with board and batten walls and an asphalt-shingle gable roof. Building number 21A, the Garage at the south Maintenance Area, is next. The **West Concrete Block Garage** (207) 1971, is a one-story concrete block building on concrete slab, with an asphalt-shingle gable roof. The **Equipment Building-Pole Barn** (22) is a one-story wood frame building with board and batten walls and an asphalt-shingle gable roof built in 1979.

The east side of the compound is made up of two buildings. The **South Maintenance Garage East** (20) built in 1955, a one-story concrete block building with an asphalt-shingle gable roof, and the Storage Barn, number 25, previously mentioned. The **Fuel Island Building** (227) built in 1984, is a one-story wood frame building on concrete slab with fiberglass walls and a flat roof. It is located in the center of the "U" formed by the three rows of buildings, and there are two gasoline pumps placed next to the fuel island building.

The north end of the area is made up of five buildings, two of which are on the back side of the row. The **Pole Barn** (219) was built in 1981, and is a one-story frame building with board and batten walls and an earthen floor. The **Miscellaneous Equipment Buildings** (220,221,222,223,224) built ca. 1974, are identical one-story frame buildings with board and batten walls and asphalt-shingle gable roofs. Two of them are located to the rear of the other buildings.

17- Trout Pond Road Area

The Trout Pond Road Area is concentrated around the Trout Pond Road, which is an extension of the road that leads to the Lauterbrunnen Area and the South Maintenance Area. The Trout Pond Road Area is just to the north of the South Maintenance Area, and encompasses both sides of the road. There are clearings around the buildings, the cemetery, and the pond, but otherwise the area is heavily wooded with old and new growth trees. The land in this area is flat, with the asphalt road the most noticeable feature of the terrain. The road was first laid out during William Letchworth's residence, and has been paved and expanded over the intervening years.

There are two non-contributing and one contributing building in the Trout Pond Road Area. The **Storage Garage** (27), was built in 1933 near the location of the first park offices, which burned down in 1946. The garage is a one-story frame garage with clapboard walls and space for four cars. The **Trout Pond Pump House** (33) was built in 1976 and is considered non-contributing. The reproduction **Schoolhouse** (232) was built in 1987. It was designed to resemble the original schoolhouse built by William Letchworth for the Town of Genesee Falls in 1872. It is a one and a half-story frame building with clapboard walls and an asphalt-shingled gable roof and a square bell tower. Archaeological investigations and research were done in the area before the building was reconstructed. It is now used for concessions storage.

In addition, there are also two other man-made sites in the Trout Pond Road Area. The **Pioneer Cemetery** is a small clearing in an otherwise wooded landscape. There are gravestones dating from the early 1800s to 1915. Six of the ten identified families in the cemetery are known early settlers in the Genesee River Valley. The gravestones range from simple stone plaques to larger, more elaborate memorials. The **Trout Pond** was built ca. 1931 and is a small, man-made lake, oval shaped, bordered by the road to the north and trees on the other sides. It was originally designed as a reservoir for fire fighting and an additional water supply. A small gravel road with a gravel-paved parking lot runs along the east end, leading to maintenance roads and riding trails.

18- Trailside Lodge Area Description

The Trailside Lodge Area is a well-defined space, separated from the rest of the park by heavy growth of trees. The area is to the north of the Trout Pond Road Area and west of the main park road. A small road runs from the Trailside Lodge Area to the Storage Garage (27) on Trout Pond Road. The area is predominantly flat, with a small rise to the west, which forms the ski slope. The grounds are clear, and a large parking lot dominates the area. The area is surrounded by trees, with primarily pines around the lodge itself. At the northwestern edge of the parking lot is a compost demonstration area. The buildings are primarily along the southern and western ends of the area. Horseback riding trails lead off from the south end of the area.

The area contains seven buildings, which are all non-contributing due to age only. **Trailside Lodge** (36), was built in 1975 and is a one-story gable-roof building with board and batten siding. Four of the buildings are of identical appearance, differing only in their dimensions. The **Storage near the Lift House** (35) built in 1976, the **Miscellaneous Equipment Building- Radio Tower** (38) built in 1969, the **Miscellaneous Ski** Building **near Trailside** (229), built in 1983 are all one-story wood frame buildings with board and batten walls and an asphalt-shingle gable roof, and the **Storage-Trailside** (34),built in 1976, is a one-story wood frame building with board and batten walls and an asphalt-shingled gable roof.

The **Miscellaneous Ski Building- Lift House** (37) is a two-story frame building with board and batten walls and stairs at the front and rear, built in 1969. A sunken lawn to the east of the buildings, has been used in the winter as an open-air skating rink. It has a conduit at one end and is approximately circular.

19- Inspiration Point Area Description

Inspiration Point Area is located along the rim of the gorge and on both sides of the main park road. It is north of the Lauterbrunnen Area and Trout Pond Road. The area's small parking lot is next to the road, with wooden fences dividing it from the paths and gorge. A small grassy island separates the parking section from the road, and another dives the parking lot into two sections.. The area is bordered by heavy woods to the north, a small ravine with a creek to the south, stone walls and the gorge to the east, and a grassy slope up towards the woods on the west side. On the east side of the park road the area centers around a small man-made lake, while on the west side the center focus is the stone house.

The area has two contributing buildings. The **Stone House** (29) was built in 1937 by the Civilian Conservation Corps. Architect Charles I. Cromwell designed the dwelling as a one-and-one-half-story stone house with side gabled-roof and dormers. The **Inspiration Point Comfort Station** (30) was built in 1951 and is a one-story stone building with an asphalt-shingled gable roof and two-pane windows placed high on the walls.

The Inspiration Point Area also has contributing landscape features and structures. The **pond** is a small man-made structure near the overlook. It is C-shaped, rock lined, and is fed by a stream running in from the south and water is released into the gorge at the east side. Two **footbridges** cross over the creek entrance and exit. These were built in 1939 and are stone veneered with an asphalt walking path across the top. **Stone walls** form an overlook and provide a barrier between Inspiration Point and the gorge. A non-contributing **information board** is located at the north end of the area, and is a two-sided wooden structure with a wood-shingled gable roof.

The path that leads along the edge of the gorge hooks up with the Gorge Trail, which runs from the Upper/Middle Falls Picnic Area to the Lower Falls and Cabin Area "A".

20- Labor Center- Administration Area Description

The Labor Center-Administration Area is located near the main park road, north of Inspiration Point and south of the Lower Falls Area. It is on the east side of the road and somewhat inland from the river gorge. The west side of the road is heavily wooded, as is the land between the area and the river. There are also large banks of trees to the north and south of the Labor Center-Administration Area. The complex itself lies on a slightly sloping piece of land, which is primarily clear of trees. There is a double row of trees leading to Prospect House through the center of the complex. A parking lot is located next to the main park road opposite the Administration Headquarters. A smaller employee parking lot is behind the building. The roads and lots are alternately asphalt-paved or gravel.

There are ten contributing and two non-contributing buildings in the area. Most are used as part of the Labor Center and sawmill complex. The **Administration Headquarters** (44), is a one-story stone building with a cross-gabled roof. The Administration building was constructed in 1950 by Attica Prison Labor. Large additions

were made to the north and east elevations of the building in 1995. **Prospect Home** (43) was built by Perry and Sally Jones in the early to mid-nineteenth century, and altered by William Letchworth in the 1870s. It is a two-and-one-half-story frame residence with clapboards and flush board siding and an asphalt-shingled jerkinhead roof. The house is now used as a home by the Park Manager and his family. The **Prospect Home Barn** (41) is currently used as Central Stores for the park staff. It is a one-story and one-and-a-half-story building with a small cupola on the central building. It has novelty siding and an asphalt-shingled cross-gable roof. Additions to the south and west provide space for a garage and office respectively. The **Sawmill** (40) is a one-story frame building with board and batten exterior walls and an asphalt-shingled gable roof. The sawmill was built in 1930 by the park and moved to this site in 1934 for use by the Civilian Conservation Corps. A former **Greenhouse** (42), built in the late 19th century, was moved to this area in 1912 to be used as a recreation space for the park employees. It is a one-story frame building with a gable roof and board and batten walls. A glass enclosed greenhouse extension is set at the rear of the building.

The Labor Center-Administration Area has a number of supporting service buildings. The **Carpenter Shop** (39) was built ca. 1938 and is a one-story frame building with board and batten exterior walls and an asphalt-shingled gable roof. The **Lumber Storage Building** (215) is a one-story frame building with board siding and a gable roof. It was built ca. 1935 to store boards from the sawmill. Behind the barn is the **Police Storage Building** (74), a former cabin from Cabin Area "C", now used by the state park police. This structure, along with another two **Storage Buildings** (47 and an unknown number) are all small log buildings with asphalt-shingled gable roofs, built ca. 1930s.

The two non-contributing buildings are a **Miscellaneous Equipment Building** (230) and **Lumber Storage at the Mill Yard** (228). The equipment building is a one-story open wood frame structure with an asphalt gable roof, dated 1983. The lumber storage building, built in 1985, is a one-story building with board and batten walls and an asphalt-shingle gable roof.

21- Castile Entrance Area Description

The Castile Entrance Area is just past the Lower Falls Road and the Archery Field. It is located on the Castile Entrance Road between the main park road and route 436. The entrance has only scattered trees, although the boundary around the area to the south is heavily wooded. By the contact station there are three lanes for traffic. One was heading west, one used for stopping at the station, and the other moving east around the station. The **Contact Station** (216) was built in 1982, and is a non-contributing building. It is a one-story building with wood siding and a flat gable roof. It sits on an island in the middle of the lanes of traffic. There is one painted wood **entrance signs** nearby.

22- Group Camping Area

The Group Camping Area is located off the main park road, west of the Lower Falls Area. A narrow gravel road leads off Lower Falls Road to the campground. The area is heavily wooded, with a few clearings for the camping sections and around the buildings. The road loops around, and there is a small gravel parking lot for

campers. The camping areas are named for tree species, such as birch, pine, and maple. There is a row of maple trees leading down one side of the campground. These trees may have originally led to Chestnut Lawn, a farm building owned by Reuben Jones in the mid-nineteenth century. William Letchworth developed the property into a dairy farm in the late 1800s. The house was removed in the 1930s.

There are two non-contributing buildings at the Group Camping Area. Both are **Comfort Stations** (45, 46), built in 1970. One comfort station (45) is a one-story board and batten building with an asphalt-shingle gable roof, the other (46) is a one-story log building with an asphalt-shingle hipped roof. There are wooden picnic tables scattered around, as well as metal grills. A large campfire circle is placed near the entrance to the camp area.

23- Lower Falls Footbridge Area Description

The Lower Falls Footbridge Area is located north of the Labor Center-Administration Area. It is off the main park road, at the south end of the Lower Falls Road. The area appears somewhat isolated, although it is just off the Lower Falls Road. It is heavily wooded on all sides. A paved parking lot is located on the northern side of the area, and the river gorge runs along the eastern side of the grounds. The ground slopes up dramatically to the west, leading up to the main park road. The Lower Falls Footbridge Area can be divided into three sections: the main picnic area, the trail picnic area, and the Lower Falls Trail itself. Each successive section is lower down the gorge slope than the one before, as well as more heavily wooded.

The Lower Falls Footbridge Area has three contributing buildings, as well as a number of contributing structures. The first two are placed near the south edge of the parking lot, the third just inside the main picnic area. This limits the impact of these structures on the landscape as a whole. The **Octagon Food Concession Stand** (186) was built in 1942 and altered in 1972. It is a one-story semi-octagonal building with stone veneer and an asphalt-shingle hip roof. The **Upper Comfort Station** (184) was built by the Civilian Conservation Corps (CCC) in 1937, and is a one-story stone building with concrete slab on grade and an asphalt-shingle gable roof. It was designed by architect Charles I. Cromwell. The **Upper Picnic Shelter** (188) was also designed by Cromwell and constructed by the CCC. It is a one-story stone building with an asphalt-shingled hipped roof.

The most identifiable structure in the area is the **Lower Falls Footbridge**. It was constructed by all four camps of the CCC at Letchworth in 1935. It is a single arch bridge with stone veneer. The **stone walls** along the ravine edge in the picnic areas were built by the CCC in 1937. Approximately forty **stone picnic tables** and sixteen **stone fireplaces** are placed in both the main picnic area and the trail picnic area. At least two **stone water fountains** and a handful of **stone benches** are also placed at the trail picnic area. All were built in the 1930s by the men of the CCC. Non-contributing wooden picnic tables and metal grills are also intermixed with the contributing structures and objects. A section of chain link fence is located near a clearing as a backstop for softball or baseball games, and a small fenced in area is reserved for horseshoes. A old paved road leads off to the south to the former location of Cabin Area "A", moved by the park staff in 1969 to its current site.

The **Lower Falls Trail** (1 & 6A), while expanded by the CCC, was originally designed by William Letchworth in the late-nineteenth century. Today it is laid out with 127 stone steps from the main and trail picnic areas. It is lined with stone walls of various styles along the side of the ravine as it drops down toward the gorge. The walk is heavily wooded, and winds through the trees down to Table Rock, where there is an overlook of the Lower Falls and the gorge. The trail then winds down to the Lower Falls Footbridge, where it crosses the river and becomes the Portage Trail (6) up to Cathedral Rock on the east side of the river. The trails are well maintained and manageable for most visitors to the park. The Lower Falls Trail is an extension of the Trail 1, the Gorge Trail.

24- Cabin Area "B" Description

Cabin Area "B" is just to the north of the Lower Falls Footbridge Area, off the Lower Falls Road. It is heavily wooded on all sides, with the Lower Falls Road occasionally visible through the trees. The roads in the area are alternately paved or gravel, and move through the area in circular patterns. The road runs by all twenty-two cabins, which face toward the center of the site and the shower/toilet/laundry building and playground. The cabins are often laid out in small groups of four or five cabins around the circular road. The area has both wooded sections and clearings, and the ground around the area is fairly flat to the north, south, and east. To the west a slope heads upward behind the main group of cabins, with cabins 11 through 15 sitting on a small plateau partway up the slope. A set of stone steps leads up to this section from the rest of the cabin area. Wooden picnic tables, metal grills, and in ground fireplaces are scattered throughout the cabin area. All of the buildings are painted a very dark brown, making them blend into the woods with ease.

There are twenty-three buildings in the area, eleven of which are contributing, twelve of which are non-contributing. The **Shower/Toilet/Laundry Building** (160) was designed by architect Charles I. Cromwell and built by the Civilian Conservation Corps in 1935. It is a one-story frame building with rough-sawn wood siding and a gable on hip roof sheathed with asphalt shingles. The other twenty-two buildings are **Cabins** (161-182), ten built in 1935, twelve built in 1965. All are one-story frame buildings with asphalt-shingle gable roofs. The walls are variously covered with rustic wood siding, log siding, T-111, and clapboard siding. Most of the buildings are rectangular-shaped, with a handful T-shape. All have screened porches attached to the front of the buildings. Individual gravel driveways lead to each cabin.

25- Lower Falls Pool Area Description

The Lower Falls Pool Area is located to the north of the Lower Falls Footbridge Area and Cabin Area "B". It is off the main park road, and is located on the lower part of the Lower Falls Road. The area is relatively clear, with scattered trees all around, and slightly denser growth at the south section of the area. The area borders the gorge to the east, although it is not visible due to a screen of trees. It is wooded in all four directions, with clearings leading to the woods. The ground is relatively even throughout the area.

The area is dominated by a large paved parking lot at the eastern side. The lot is lit with large y-shaped light fixtures. A small row of wooden picnic tables is lined up between the lot and the edge of the gorge. There are

other picnic tables scattered throughout the area. The Gorge Trail leads through the area, entering at the south and exiting at the north near the Lower Falls Road. Trail 5, the Lee's Landing Trail, leads off from the eastern edge of the area. It is also a small access road to Lee's Landing, where rafts and canoes launch for tours down the river. The road winds down through the woods to a clearing at river level.

There are two contributing buildings one contributing structure at the Lower Falls Pool Area. The **Lower Falls Bathhouse** (183) is a one-story frame building with a multi-level cross-gable and hipped roof with asphalt shingles. Built in 1949, it has board and batten walls and stone facing around the front door. The 1950 **Lower Falls Swimming Pool** is a concrete pool with metal railings at end. It has a concrete deck and steps. The **Lower Falls Restaurant** (187) is a one-story building with rustic clapboards and stone walls and a multi-level gable roof. It was completed in 1948.

There are two non-contributing buildings in the area. The **Comfort Station** (185) a one-story stone building with an asphalt-shingle gable roof, built in 1976. The **Lower Falls Picnic Shelter** (189) is a one-story open structure with an asphalt-shingle cross gable roof. It was completed in 1957. There are scattered **stone water fountains** around the area. There is also non-contributing playground equipment and a modern horseshoe pit at the northern end, past the parking lot.

26- Cabin Area "A" Description

Cabin Area "A" is located to the north of the Lower Falls Pool Area, off an access road from the Lower Falls Road, and to the east of the main park road. It is heavily wooded on all sides. The roads in the area are paved, and move through the area in circular patterns. The road runs by all twenty-two cabins, which face toward the center of the site and the shower/toilet/laundry building and playground. The cabins are well-spaced throughout the area, and the grounds are relatively clear. The area has both wooded sections and clearings, and the ground around the area is fairly flat to the north and south. To the east the ground drops off towards the gorge, and a metal fence is placed near the edge for safety. Wooden picnic tables, metal grills, and in ground fireplaces are scattered throughout the cabin area. All of the buildings are painted a very dark brown, making them blend into the woods with ease.

This cabin area was moved from its original location near the Lower Falls Footbridge Area in 1969. The cabins were all pulled down for the move and some of the materials were reused in the current buildings. There are twenty-three non-contributing buildings in this area. The **Shower/Toilet/Laundry Building** (137) was built in 1969 when the cabin area was moved. It is a one-story T-shaped building with board and batten walls and an asphalt-shingle cross-gable roof. The **Cabins** (138-159) were all constructed between 1968 and 1970. All are one-story frame buildings with asphalt-shingle gable roofs. The walls are covered with either log siding or board and batten siding. Most of the buildings are rectangular-shaped, with a handful either L-shaped or T-shaped. All have screened porches attached to the front of the buildings. Individual gravel driveways lead to each cabin.

27- Wolf Creek Area Description

Wolf Creek Area is to the north of Great Bend Overlook and the Castile Entrance. It is located on the east side of the main park road, at the outlet of Wolf Creek. It is bordered by woods to the north, with the gorge to the east and the main park road to the west. To the south the area is bounded by both heavily wooded land and Wolf Creek ravine. The creek narrows as it runs by the Picnic Area, then spills over the edge of the gorge down into the river. The land slopes up both to the north and south. To the west of the road is a large stone retaining wall shoring up the side of the hill. Wolf Creek Area is wooded with pine and deciduous trees. A small paved **parking area**, designed ca. 1930, with stone curbs is placed next to the main park road. Most paths through the area are gravel, with asphalt paths leading from the parking area to the comfort station.

There is one contributing building in the Wolf Creek Area. The **Wolf Creek Comfort Station** (122), is a one-story stone building with freestanding stone walls and steps at the front and sides. It was designed by architect Charles I. Cromwell and built by the Civilian Conservation Corps. The **Wolf Creek Bridge** was built in 1927 as the road was being developed. The bridge is a single-span concrete arch with masonry stone veneer. The small **Wolf Creek Footbridge** was made in 1989 and says "Steadfast Bridges, Fort Payne, Alabama."

Stone steps lead down into the Wolf Creek Area from both the north and the south. These steps lead to the Gorge Trail. Stone walls run on both sides of the creek and around the picnic area. There are at least fourteen **stone picnic tables**, one **stone fireplace**, and one **stone water fountain** scattered around the east side of the area. Wooden picnic tables and metal grills are also scattered throughout the area.

28- Tea Table Area Description

The Tea Table Area is just to the north of the Wolf Creek Area. It is divided into two sections by the main park road. The east section, near the gorge, is called Tea Table Picnic Area. The west area is known as Eddy's Picnic Area, and is the larger of the two. Tea Table is bordered to the east by the Genesee Gorge, with a metal fence and low stone wall as barriers, and to the north and south by trees. To the west the boundary is the main park road. Eddy's section is heavily wooded to the north, west, and south, and bounded to the east by the main park road. The ground slopes gradually upwards to the west in the Eddy's area, then more sharply behind the area. Most of the area in the northern part of Eddy's is cleared of trees. Both areas have scattered trees, and Eddy's has a large paved parking lot with grassy islands and a few trees. Stone curbing can be found all around the parking lot.

The Tea Table Area has three contributing buildings. The Tea Table Picnic section has one building, the **Tea Table Picnic Shelter** (121). It is a one-story log shelter with an asphalt-shingle gable roof. Built in 1931, it is pictured in the 1935 National Park Service publication *Park Structures and Facilities*. The area has at least twelve **stone tables** scattered around, as well as one **stone fountain** and a number of non-contributing metal grills. The Gorge Trail runs through the area.

The two contributing buildings in Eddy's Picnic section are **Eddy's Picnic Shelter** (119), and **Eddy's Comfort Station** (120). The picnic shelter is a one-story stone shelter with an asphalt-shingle gable roof with rustic clapboards in the gable ends. It was built by the Civilian Conservation Corps ca. 1940. The comfort station, also ca. 1940, was built by Attica Prison Labor. It is a one-story stone building with an asphalt-shingle gable roof. There is playground equipment near the picnic shelter, and the clearing north of the parking lot is used for both picnic and games. To the south of the main picnic area is a smaller wooded section of Eddy's with approximately five **stone picnic tables** and one **stone fountain**, along with a number of wooden tables and metal grills. This area is separated from the rest of Eddy's Picnic Area by a screen of trees, with three footpaths from the main area.

29- St. Helena "A" Area Description

St. Helena "A" Area is north of the Tea Table Area near the Gardeau Flats. The area is bounded to the north, east, and south by woods, and the west by a slope up to the main park road. The woods continue on the other side of the main park road. The area is relatively small, and clear aside from a few trees scattered around. The parking area is small, and is part paved, part gravel. Trail number 13, the St. Helena Trail, leads from the east side of the area. Trail number 1, the Gorge Trail, leads in from the south. A metal fence runs along the east edge, where the area borders the gorge. The paved road into the area forms a loop, allowing visitors only one way in and out.

The area has two buildings, one contributing, the other non-contributing. The **St Helena Picnic Shelter** (118), was built by the Civilian Conservation Corps in 1934-35. It is a one-story log shelter with flagstones set in concrete and an asphalt-shingle cross-gable roof. The **Comfort Station-Upper** (117), was built in 1966 and is a one-story brick building with an asphalt-shingle gable roof and tongue and groove boards around the doors and the center of the building.

The St. Helena "A" Area has at least eight **stone tables** scattered around the area to the north and south of the picnic shelter, and to the east of the comfort station. There is one **stone water fountain**, and numerous non-contributing metal grills and wooden picnic tables. A **stone wall** leads from the north end of the area along the main park road.

30- St. Helena "B" Area Description

The St. Helena "B" Area is north of St. Helena "A" and off the main park road to the east. It branches off to the left from the road which leads to both St. Helena "B" and "C". The area is wooded to the north, east, and west, with the road running along the south side. There is a medium-sized paved parking lot with three grassy islands with trees. The area is relatively clear, with only one building and a scattering of picnic tables.

The one building in St. Helena "B" Area is a non-contributing **Comfort Station** (116). Built in 1967, it is a one-story brick building with an asphalt-shingle gable roof and tongue and groove boards at the doors and center. The wooden picnic tables, metal grills, and stone fountain are also non-contributing.

31- St. Helena "C" Area Description

The St. Helena "C" Area is north of St. Helena "B" and off the main park road to the east. It is at the end of the road which leads to both St. Helena "B" and "C". The area is wooded to the north, east, and west, with the road running along the south end. There is a large paved parking area with a sidewalk around the north edge. The area is very open, with scattered picnic tables, stone fountains, playground equipment, and metal grills. A large field is located behind the comfort station and parking lot. Trail number 13, the St. Helena Trail, leads from the east side of the area. Trail 13 is also part of Trail 1, the Gorge Trail.

There is only one building in the area, and it is non-contributing. The **Comfort Station** (115), built in 1967, is a one-story brick building with an asphalt-shingle gable roof and tongue and groove boards around the doors and center of the building. None of the features in the area are contributing, including the picnic tables and stone fountains.

32- Littledyke House Area Description

Littledyke House Area is located in the northern end of the park, opposite the Perry Entrance at Schenk Road. It is on the east side of the main park road, to the north of the Highbanks Camping Area Entrance. The land is flat, with mature trees scattered in the yard. The grounds are nicely landscaped with shrubs and flowers near the house. The area has two sections, Littledyke House itself, and the two-building maintenance section just to the north. The area is open to the road on the west side, and a narrow screen of trees separates the area from the Highbanks Camping Area Road to the south. The area is bounded by woods to the east and north, and the maintenance section is screened from the main park road to the west.

There are three entrances to the area. The first two are either end of a circular driveway in front of the house. On the north side of the driveway is a small paved road, which leads behind the house and back to the maintenance area. There is also a dirt road off the main park road leading to the maintenance area. This leads to a parking area in front of the two buildings, as well as an area for equipment storage.

There are two contributing and two non-contributing buildings in the Littledyke House Area. The **Littledyke House** (49), was built ca. 1840-1850, and is the last remnant of the former village of Gibsonville. It is a one-and-one-half-story Greek Revival farmhouse with a one-story flanking wing and an attached garage. A **Log Storage Shed** (51) stands to the north east of the house. It is a one-story log building with a gable roof, built by the Civilian Conservation Corps ca. 1935. It was moved to Littledyke house from an unknown area. The one-story **Miscellaneous Equipment Building** (50), was moved to the Littledyke House Area in 1978. It is a garage building with board and batten siding and a metal gable roof. A gasoline pump is located next to the building. There is also a small **Storage Building** (209) behind the house, with board and batten walls and an asphalt-shingle gable roof, built in 1970.

33- Perry Entrance Area Description

The Perry Entrance is located on Schenck Road, which leads out of the park on the way to the Village of Perry. The entrance area is clear, with only a few trees scattered about. By the contact station there are three lanes for traffic. One was heading west, one used for stopping at the station, and the other moving east around the station. The contact station sits on a grassy median with only a few trees. The area is heavily wooded on both the north and the south borders of the entranceway.

The Entrance area consists of the **Contact Station** (48), and one painted wood entrance sign. The contact station was built in 1966, and is very similar to the station at Portageville. It is a one-story stone and wood building with an asphalt-shingle gable roof. It is built in two sections and the roofline stretches over both sections and the one lane road that runs between them.

34- Highbanks Camping Area Description

The Highbanks Camping Area is located near the outlet of Silver Lake, although the entrance to the area is opposite the Perry Entrance to the park. The area is very large, and bounded all around by heavy woods. The grounds are very level, with only a slight slope toward the river to the east. The main access road, and the roads into each camping section, are curvilinear. There are eight camping areas in the complex. Each one has hookups for electricity and water, numbered posts and metal grills. The road through each camping area is paved with a mixture of gravel and asphalt, and forms a loop through the area. As the roads are narrow, traffic only goes counter-clockwise through each section. The area around each section is heavily wooded, with a large proportion of pine trees in the mix. At the center of each section is a comfort station, and picnic tables are scattered throughout the sections. Near section 300, at the middle of the grounds, is the camping center, an open area with service buildings, picnic areas, playground equipment, and open fields for sporting events. A large parking lot is located in this section of the area, although it is in walking distance from all of the camping grounds.

Two trails lead in and out of the Highbanks Camping Area. Trail 17, the Big Flats Trail, starts near the camping contact station and meanders through the Gardeau Flats. The Kisil Point Trail, Trail 18, leads out of camping area number 100. This leads back to the Kisil Point Area, which is inaccessible by automobile.

There are twelve buildings in the Highbanks Camping Area, none of which are contributing. The **Camping Contact Station** (52), was built in 1965, and is a one-story concrete block building with an asphalt-shingle gable roof and large windows on all four sides. At the camping center, there is a **Comfort Station** (54), **Recreation Building** (55), and **Store and Laundry** (53). All three were built in 1966. The comfort station is a one-story brick building with small high windows and an asphalt-shingle gable roof. The recreation building is a one-story building with board and batten walls and a metal gable roof. It has windows on three sides of the building and multiple sets of doors all around the structure. The store and laundry building is a one-story frame building with board and batten walls and an asphalt-shingle gable roof. It has large windows on the front and rear elevations and a shed addition on the front elevation. In each camping section there is one **Comfort Station**

(107 through 114) all built between 1966 and 1973. All in the same design style with either brick or cinderblock construction, all have an asphalt-shingle gable roof and a small brick chimney.

35- Kisil Point Area Description

The Kisil Point Area can be accessed by Trail 18, the Kisil Point Trail, from either camping area 100 or walking from the main park road. There is no automobile access to the area, which makes the site isolated and rather intact from the date of its construction. Both the trail and the point itself are heavily wooded on all sides, though the picnic area has been cleared of some trees and much of the underbrush. To the east the area borders the river gorge, with a small overlook that is slightly obscured by tree growth. The shelter sits on a small plateau, and the ground slopes down to the north, east, and west. Only to the south, along the same line as the trail runs, does the ground remain level.

Kisil Point Shelter (106) was built by the men of the Civilian Conservation Corps (CCC) in 1934-35. Designed by architect Charles I. Cromwell, it was featured in the National Park Service's publication, *Park Structures and Facilities* (1935). It is a one-story log shelter with wooden railings and a wood-shingle gable roof. A large fireplace is set at one end of the building, and it is open on the other end. Five **stone picnic tables**, also erected by the CCC, are scattered along the east and west slopes of the area below the shelter. Compared to most of the tables on the park, there are no stone benches attached to these objects.

36- Cabin Area "C" Description

Cabin Area "C" is located north of the Littledyke House Area and to the west of the Kisil Point Area. It is on an access road off the main park road. It is heavily wooded on all sides, and the ground slopes down toward the gorge on the east and north sides. The land within the area rises and falls, with the highest point being in the southeastern section. The cabins are grouped in clusters of four or five. The river is not visible from the camp. The access road forms a loop that runs by all of the cabins, which are set around the area in a circular fashion. All of the cabins have small gravel driveways to the buildings. The shower/toilet/laundry facility and playground equipment are located in the center of the area in a grassy island.

The eighteen **Cabins** (56, 58, 60, 62, 65, 66, 71, 72, 73, 233, 234, 240, 241, 242, 236, 237, 238, 235) in Cabin Area "C" are a mixture of contributing and non-contributing. While some of the cabins are original from the construction by the Civilian Conservation Corps (CCC), others have been added, and some original ones were torn down to build larger, more modern facilities. Only six of the buildings are original, and therefore deemed contributing. Cabins 1,5,7,16,17,and 18 are of original CCC construction. Cabins 3,10, and 11 were built in 1979. All of the others: 2,4,6,8,9,12,13,14, and 15, were built between 1993 and 1995. The oldest and the newest cabins are both of log construction, while the 1979 cabins were built with board and batten walls. All cabins have an asphalt-shingle gable roof, and cabins 2,4,10, and 11 have a permanent ramp leading to the front entrances for visitors with disabilities. The cabins range in style from L-shaped, to T-shaped, to rectangular. All of the original cabins face away from the access road and towards the woods behind, while the more modern cabins all face towards one another. The **Shower/Toilet/Laundry Facility** (78) is a one-story T-shaped log

building with an asphalt-shingled gable roof and small high windows. It was re-built during the last wave of cabin construction in the mid-1990s. The other two sets of cabins are painted dark brown, while the newer buildings have been left as natural wood.

37- Caretaker's House Area Description

The Caretaker's House Area is just to the north of the entrance to Cabin Area "C". It is located to the east of the main park road, and is bounded by heavily wooded land to the north, south, and east. The road borders the area to the west. The area has a few trees in the front and backyard of the house. A small asphalt and gravel driveway runs between the house and the pump house on the north side end of the area. At the front of the driveway there are four parking spaces for visitors and a payphone booth. A flagpole stands in front of the main building.

The **Caretaker's House** (104), was built by the Gibsonville Civilian Conservation Corps (CCC) Camp ca. 1936 and designed by architect Charles I. Cromwell. It is a two-story log building with an asphalt-shingle gable roof with dormers, and a large front porch. A wheelchair ramp is located on the north side of the building. The **Pump House** (103), was built during the same period by Cromwell and the CCC. It is a small log building with an asphalt-shingle gable roof. A small fenced area is currently located next to the pump house.

38- Highbanks Recreation Area Description

The Highbanks Recreation Area is the largest in the north end of the park. It is to the north of the Caretaker's House Area, on the east side of the main park road. The area is very open, and is dominated by a parking lot large enough for over one thousand cars. It is bounded by woods to the north and south, by the gorge to the east, and by the main park road to the west. However, the boundaries of the area are far away from the buildings, making the area appear to be on a large plain. On the eastern side of the area the landscape is lightly wooded with numerous wooden picnic tables and metal grills in this section. A metal fence separates this section from the edge of the gorge. From the parking area there are asphalt paved paths throughout the area and between buildings. The buildings are primarily located in a semi-circle around the parking lot, with only a picnic shelter away from the main grouping.

Unlike some areas of the park at the south end, the exclusive purpose of the Highbanks Recreation area is simply that: recreation. All of the buildings in the area are directed toward bringing in large numbers of people for the enjoyment of the pool, picnics, the playground, sporting activities, and keeping them safe while doing so. Playground equipment is scattered throughout the area, as are picnic tables and open fields for volleyball and other sports.

There are eleven buildings in the Highbanks Recreation Area, all of them non-contributing due to age only. The most visible building is the **Bathhouse at the Highbanks Pool** (88), built in 1963, as were most of the buildings in this area. It is a one-story frame building with a combination hipped and soaring gable roof. It has wood clapboards and glass on the front and rear elevations. Stone piers terminate as planters at the front entrance, and serpentine brick walls extend from either side of the building. These form the hallways for men

and women visitors to the locker rooms and the **Pool**. It is actually two pools, with metal railings around the edge and a concrete deck around all sides. Nearby, the **Chlorine Storage Building** (239), was built in the 1960s and is a one-story brick building with an asphalt-shingle gable roof and wood siding in the gable ends. The **Grandstand/Filter Building** (87), was built in 1963. It has multi-rows of seats above a one-story brick building. It has a fiberglass awning above the seats, and concrete steps on either side of the seating area. Cement piers extend above the seating area, serving as flagpoles. The **Food Concession/Snack Bar** (86), is a one-story metal-framed building with an asphalt-shingle gable roof and colored tiles along the lower end of the walls. Like many of the other buildings, it was completed in 1963. There are an additional three small shed buildings used for storage in the area. These are not numbered, but all are small brick structures with a pebbled shed roof and an overhead garage door on one side.

Outside of the pool area, the closest building is the **Comfort Station-Northeast** (84), built in 1963. It is a one-story brick building with an asphalt-shingle gable roof and wood siding in the gable ends. The **North Picnic Shelter** (81), is a one-story brick building with an asphalt-shingle cross-gable roof. It has large glass doors and windows with wood siding below the window frames. Elliptical wooden arches are located below the gable ends, and T-shaped stone piers support the building near the entranceways. An identical structure is the **South Picnic Shelter** (79), also built in 1961. The **Middle and Northeast Comfort Stations** (82 & 83) are also identical, built in 1961 and 1962. Both are one-story brick buildings with an asphalt-shingle gable roof with broad overhangs and exposed rafter tails. The third **Picnic Shelter** (80), was completed in 1961, and is an open one-story structure with an asphalt-shingle gable roof, with wood and brick piers. It has exposed rafter beams and elliptical laminated wood arches below the gable ends. One end is enclosed and has a chimney. The final building, the **Park Police Headquarters** (85), was built in 1962. It is a one-story stone building with an inverted soaring asphalt-shingle gable roof and wood siding around the doors and under the roofline.

39- Conlon Point Area Description

The Conlon Point Area is located to the east of the Highbanks Recreation Area, and is accessible by Trail 20, the Highbanks Trail, or a park maintenance road. It is wooded on all sides, and there is a steep drop-off into the gorge to the east. A stone wall is stationed between the picnic area and the gorge, with metal fencing placed at either end of the wall. The overlook at Conlon Point gives a clear view of the Hogsback a section of the gorge and river.

The **Conlon Point Shelter** (102) is a non-contributing building, and the only building in the area. It was built in 1963, and is a one-story open structure with a gable roof, exposed rafters, and wood supports. It is currently painted bright orange. The eastern side of the structure is seated behind a low stone wall with a narrow paved path between this wall and the one at the edge of the gorge.

40- Dam Overlook Area Description

The Dam Overlook Area is located north of the Highbanks Recreation Area. It is on the eastern side of the main park road, at an advantageous spot for viewing the Mt. Morris Dam. The area was built in 1948 by the Corps of

Engineers so that visitors could watch the progress in the building of the dam. The land is clear to the north, west and south. The overlook is set next to the gorge, which bounds the area to the east. The area has a large paved parking lot, with a grassy island between it and the main park road.

There is one contributing building in the area, the **Dam Overlook Shelter** (100). It is a open one-story structure with an asphalt-shingle hip roof and low board walls. From this overlook there is a good view of both the dam and the river leading back to the Highbanks area.

41- William Whitmore House Area Description

The William Whitmore House Area is located on the west side of the main park road, just north of the Highbanks Recreation Area. It is bounded to the south by a clearing with woods behind it, to the north by a large clearing, to the east by the main park road, and to the west by woods. A large asphalt-paved drive curves around the front of the house, creating a large grassy island with a number of mature trees. The driveway also extends along the north side of the house to the garage, which sits to the northwest of the main house.

There are two contributing buildings in this area. The **William C. Whitmore House** (89), was built ca. 1915-1925 and purchased by the park during its expansion to the north in the 1930s. It is a one-story bungalow-style frame house with a cross-gable roof and cedar shakes and stone veneer on the exterior walls. It is currently used as the Park Manager's House (north Police Residence?) The **Garage** (90) dates to the same period, and is a one-story frame building with clapboard walls and an asphalt-shingle gable roof. It has two garage doors on the front elevation.

42- Mt. Morris Dam Area Description

The Mt. Morris Dam Area is located to the north of Dam Overlook Area. The area is flat, and bordered by the woods to the north. The gorge is to the east, with the main park road to the west. A large clearing sits to the south. The area is dominated by a large paved parking lot, with the two buildings on the northern end of the area. There are small grassy islands in the parking lot, and a few trees near the buildings. An asphalt sidewalk leads from the parking area to the overlook and the two buildings. A metal fence borders the gorge on the eastern side, with a large **signboard** in a stone foundation with a gable roof. The board provides a map to the area and a description of the building of the dam. Trail 20, the Highbanks Trail, passes through the area on the eastern side.

There is one contributing and one non-contributing building in the Mt. Morris Dam Area. The **Food Concession** (99), is a one-story building with wood siding and a cross-gable asphalt-shingle roof. It has double glass doors and glass around the front entrance, and was built in 1948. A small wooden fence is located to the west of the concessions building. The **Comfort Station** (98), is a one-story stone building with an asphalt-shingle gable roof. It was built in 1956.

43- Quonset Area Description

The Quonset Area is located on the west side of the main park road, opposite the Mt. Morris Dam Area. It is an open area, bounded by a metal fence on all sides. On the other side of the fence, there are woods to the west and the south, a parking area with a few trees to the north, and a clearing to the east. Heavy equipment is visible all over the area.

There are three contributing buildings in the Quonset Area. The main building is the **Maintenance Garage-Quonset** (91), a semi-circular corrugated metal building with garage doors at the front and rear. It was erected in 1948. The **Storage Building** (75), was built in 1935 as a cabin in Cabin Area "C". It is a one-story log building with an asphalt-shingle gable roof. The **Former Woodbin-Storage** (217), was also built in 1935 and moved to the Quonset Area. It is a one-story frame building with board siding and an asphalt-shingle shed roof.

44- Mt. Morris Entrance Area Description

The Mt. Morris Entrance is located on the main park road, which leads out of the park on the way to the Village of Mt. Morris. The entrance area is clear, with only a few trees scattered about. By the contact station there are three lanes for traffic. One was heading north, one used for stopping at the station, and the other moving south around the station. The contact station sits on a grassy median with only a few trees. The area is heavily wooded on the east border, with a partial view over the nearby farms to the west of the entranceway.

The Entrance area consists of the **Contact Station** (48), and one painted wood entrance sign. The contact station was built in 1966, and is very similar to the station at Portageville. It is a one-story stone and wood building with an asphalt-shingle gable roof. It is built in two sections and the roofline stretches over both sections and the one lane road that runs between them.

45- North End Residence Area Description

The North Residence Area is at the very north end of the park, past the Mt. Morris Entrance Area. It is located to the east of the main park road, up a slight hill from the road itself. The narrow access road is heavily wooded on both sides. The area is on both sides of the access road, and is wooded on all sides. Small fields are opposite the houses to the south.

There are six contributing buildings in the North End Residence Area. The two houses were the homes of former landowners from the time before the land was purchased for the park. The first **Park Residence** (97), was built by Charles Sider ca. 1940. It is a one-story frame residence with novelty siding and an asphalt-shingle cross gable roof. The **Garage** (96) next to it was also owned by Sider. It is a one-and-one-half-story concrete block building with a gable roof with dormer. It was also built ca. 1940. The second **Park Residence** (95) is a one-and-one-half-story frame residence with cedar shingles and an asphalt-shingle gable roof with chimney. It was also built ca. 1940. The **Garage** (94) across the street is a one-story frame building with asbestos siding and an asphalt-shingle gable roof. The nearby **Shed** (218) was moved here from Silver Lake. It was built ca. 1940

and is a one-story shed with asbestos-shingle walls and an asphalt-shingle gable roof. In the woods the **Former Greenhouse** (231), is a two-story frame building with stucco walls and an asphalt-shingled gable roof. It was built ca. 1910 or possibly earlier.

46- Cabin Area "D" Description

Cabin Area "D" is located on the east side of the park and is the southernmost area on this side. It is heavily wooded on all sides, with the Park Road entering the area from the northeast. The road in the area is mostly gravel with occasional spots of paving. The area runs between the gorge and the Parade Grounds Area and is designed in a semi-circle. While the road itself is on one level, the ground slopes up on the western side of the area and down toward the Parade Grounds on the eastern side. The road runs by seven of the ten cabins, with small offshoot roads to the other three cabins, before it ends by the last cabin in the row. The ground slopes up on the side where the cabins are situated, placing them all above the level of the road. In some cases the cabins are separated by narrow bands of woods, although the area around each cabin is clear with only the occasional tree. Three cabins are hidden in the woods behind the main row. The shower/toilet building is located at the end of the row of buildings, closest to the entrance road. There is a path behind it leading up to cabins 1 and 2.

There are eleven contributing buildings in the area. The **Shower/Toilet Building** (192) was designed by Charles I. Cromwell and built by the men of the CCC. It is a one-story log building with an asphalt-shingled gable roof. The ten **Cabins** (195-204) were also built by the CCC and designed by Charles I. Cromwell. Built in 1934, all are one-story log cabins with asphalt-shingled roofs. Some have log porches, and others have shed roofs as opposed to gable ones. All have either stone or cinderblock chimneys. There is one **stone water fountain** sited in front of cabin 6. Wooden picnic tables and metal grilles are located near each cabin. A small **stone wall with a water spigot** for washing is located in front of cabin 9.

47- Parade Grounds Area Description

The Parade Grounds Area is located on the east side of the Genesee River, across the river from Inspiration Point and to the north and east of the Cabin Area "D" Area. It is off the one road leading into the east side areas from Route 436. The area is bounded by forest in all four directions, with a slight slope upwards on the west side. The Parade Grounds Area itself is fairly level and open, with a small parking lot at the north end. There are large trees at the north end of the area, but the rest of the grounds are open, in keeping with their nineteenth century use as a military training ground. A trail on the western side of the area near the shelter leads to Cabin Area D.

The parking lot is located at the north end of the area along with all of the contributing buildings and objects at the **Parade Grounds**. The parking area is paved with asphalt and gravel and separated into sections by grassy dividers. There is limited curbing, located only near the sidewalk to the buildings. At the south end of the lot playground equipment has been erected. A large **memorial boulder** was placed on the grounds ca. 1933. On the north side there is a metal plaque dedicated to the 136th Infantry which was trained here in 1862. The south side holds a plaque dedicated to the First New York Dragoons, originally known as the 130th New York Volunteer

Infantry, which was organized here in 1862 as well. A New York State highway plaque also commemorates the location of the camp.

There are two contributing buildings in the Parade Grounds Area. The **Parade Grounds Picnic Shelter** (191) was built in 1934 by the men of the Civilian Conservation Corps. It is a one-story log shelter with and asphalt-shingled gable roof. The **Parade Grounds Comfort Station** (190) was built in 1949 and is a one-story stone building with an asphalt-shingled gable roof. There are four **stone picnic tables** located behind the picnic shelter, and one **stone water fountain** near the parking area. Numerous non-contributing wooden picnic tables and metal grills are scattered around the north end of the area near the shelter and comfort station.

48- Cabin Area "E" Description

Cabin Area "E" is located on the east side of the Genesee River north of the Parade Grounds and south of the Great Bend. It is located approximately across from Cabin Area "A". The area is on the east side of the Park Road. The cabin road runs off the main park road in a semicircular shape. The road is primarily asphalt paved with sections of gravel and runs between the ten cabins and the three comfort stations and pump house. The cabin area is bounded by trees on all sides, with only a small clearing opposite the cabins which holds playground equipment and room for a small athletic field. The ground slopes upwards behind the cabins to the east, but is fairly level to the west toward the road and river. All of the cabins face in towards the road except for cabin 8 which faces sideways towards cabin 7. Trail 9, the Dishmill Creek Trail, leads out of the area between cabins 8 and 9. After the last cabin there is a long expanse of road before returning to the main park road. It is likely that more cabins were intended that were ever built in this area.

There are ten contributing and four non-contributing buildings in this area. The ten **Cabins** (127-136) were all built between 1933 and 1934 and designed by Charles I. Cromwell. The cabins are one-story log-sided buildings with asphalt-shingled gable roofs. The three **Comfort Stations** (123-125) were all built ca. 1954 and are small one-story log-sided buildings with gable roofs and doors at either end. The **Pump House** (126) was built in 1975 and is a one-story board and batten building with an asphalt-shingled gable roof.

49- Federal Dam Reservation Area Description

The Federal Dam Reservation Area is located on the east side of the river at the north end of the park, opposite the Mt. Morris Dam Area. It can be accessed from the main dam road or off or the Finger Lakes Trail (FLT), which runs north-south through the area. The area is bounded to the west by the river gorge, and to the north, south, and east by trees. The grounds are level, and mostly devoid of trees within the area itself. A road runs through the area to the north and curves around below the level of the area to the dam itself. This road runs between the residences and the garages. A large lawn stretches out from the residences to the area access road. A **parking lot** is located at the southwestern end of the area, and has grassy medians and no curbing. A sidewalk runs along the north side to the Visitor's Center. The Finger Lakes Trail enters at the south end of the parking lot and exits the area at the north end of the dam road.

There are six buildings in the area, two of which are contributing. The **Visitor Center**, completed in 1998, sits in the center of the area. It is a one-story frame building with a asphalt-shingle cross-gable roof and stone walls. Large glass windows are located on the front side. A large corrugated metal addition is located at the rear, providing extra exhibit and office space. The two **garages** are similar to the Visitor Center addition. They are both corrugated metal buildings with shed roofs. The two **residences**, built ca. 1948, were originally of the same design. While one is still a one-and-one-half-story building with a gable roof and an attached garage, the other has been remodeled by adding a second story to the building. Both have new vinyl siding. The first building is considered contributing, while the remodeled one is not. The small round **turret** is built of stone with a slate roof. It is considered contributing and was probably part of the development of the dam itself.

Arboretum Description

The Letchworth Park Arboretum was started on May 12, 1912, and continued until 1919. It was initiated by William Letchworth in his discussions with Dr. Charles Dow, a member of the American Scenic and Historic Preservation Society and later Director of the Park. Dow traveled to maintained forests and arboretums around the world before beginning the work at Letchworth Park. In a letter from Caroline Bishop, William Letchworth's former secretary, Dow is quoted about his feelings about the importance of an arboretum:

> The principle is that it shall consist of a permanent collection of the world's timber trees likely to thrive in this northern climate, planted scientifically, to test their value and illustrate the processes of development, so supplying not only knowledge for knowledge's sake, but also knowledge for practical use.[1]

In 1929 the arboretum was recorded as having consisted of 49 blocks of trees, with eighty-four different varieties. Approximately 250,000 individual trees were planted. A list of the species is included below. The trees were planted with approximately four feet by four feet of space each. In some cases the trees had to be thinned out because this was too close for some species.

Conifers		
White Pine	White Fir	Colorado Spruce
Blue Spruce	Limber Pine	Sitka Spruce
Bull Pine	Mountain Pine	Pichta Spruce
Australian Pine	Scrub Pine	Nordmann Fir
White Spruce	Shortleaf Pine	Engelman Spruce
Scotch Pine	Pinon Pine	Numidican Fir
Jack Pine	Norway Spruce	Arizona Fir
Black Spruce	Noble Fir	Balsam Fir

[1] Caroline Bishop to Mr. Johnson, March 31, 1913.

Douglas Fir
Silver Fir
Oriental Spruce
European Larch
Veitch Fir
Morinda Spruce
Arborvitae (plicata)
Red Cedar
Hemlock
Lawson Cypress
Deodar Cedar
Jeffrey Pine

Deciduous
Hardy Catalpa
Burr Oak
Tulip Tree
White Ash
American Elm
Linden
Red Oak
Paper Birch
Common Oak
Green Ash
Norway Maple
English Black Walnut
Mountain Ash
Silver Maple
European Beech
European Chestnut
Yellow Birch
White Birch
Poplar (argentea)
Black Cherry
Pin Oak
Cottonwood
Scarlet Oak
Maple (tataricum)
Maple (campestris)
European Linden
Slippery Elm
Box Elder
Honey Locust
Butternut
Blue Beech
Green Ash
Black Poplar
Beech
English Field Maple
Sugar Maple
Burr Oak
Yellow Oak
American Aspen
Black Birch
Linden (Americana)
Chestnut (dentata)
Sycamore

Many of the blocks can still be seen along the main park road. They run on the east side of the road opposite the Lauterbrunnen Area, and on both sides of the road between the Inspiration Point Area and the Labor Center-Administration Area. Another area of tree blocks was near the Erie Railroad line in the west side of the river. Sixteen of these blocks can still be seen from Trail 2, the Mary Jemison Trail.

Erie Railroad Corridor Description

The Erie Railroad Corridor is a linear area running through the park from the east side of the river, over the Genesee River via the Portage High Bridge, and through the woods on the west side before it exits the park. The Erie railroad was completed in 1852 and its corridor is currently owned and used by the Norfolk-Southern Railway Company. Within Letchworth State Park there are three extant resources from the nineteenth century rail line. The iron **Portage High Bridge** was erected in 1875 to replace the original wooden bridge which caught fire and burned. The **Railroad Reservoir**, in place by the turn of the century, is a small creek in a ravine that has been dammed to create a pond. The dam is formed of large dry stone walls. The **rail line**, is made up of wooden ties and iron rails, and runs east to west across the south end of the park.

Genesee Valley Canal/ Railway Corridor Description

The Genesee Valley Canal is a linear resource area which enters the park from the east at Oakland Road. The canal, completed in modern day Letchworth State Park in 1856, was a connection between the Allegany River

and the Erie Canal at Rochester. A 5 ¾-mile stretch of the canal moves through the park. This section of the canal was the most difficult to build, taking from 1836 until 1956 to complete. Within the modern park boundaries there are a number of resources still extant. On the east side of the park are the seven **locks**, which run from Oakland Road in Nunda to just before present day Short Track Road. The locks, numbered 53 through 60, are all made of large ashlar dry stone walls with steep sides and visible metal rods, brackets, and wooden gate posts. The canal bed is narrow, although the **prism** and **towpath** are still quite visible. The **Deep Cut**, a two-mile, fifty-foot deep man-made ravine, begins near the location of Lock 60 and continues below Short Track Road towards the main part of the park. Near the gorge the **tunnel** is still visible, although it is not very stable due to rock and dirt slides and has been closed off. The tunnel was an attempt to move the canal through the gorge, instead of around as became necessary. The canal's path is still visible along the edge of the gorge, where it was pinned to follow the river's path. All that remains today of the **aqueduct** over the Genesee River are the stone piers on the east and west banks and the two freestanding piers in the middle of the river.

The Genesee Valley Canal Railroad, later known as the Pennsylvania Railroad, bought the canal in 1880, after it closed in 1878. The rail line follows the canal bed and towpath through most of its distance through the park, coming into the canal bed at Lock 60 and the Deep Cut. The railroad line runs parallel to the canal on higher ground within the park boundaries until it reaches Oakland Road in Nunda. Wooden railroad ties and the rail bed are still visible both within the prism and on the towpath. The Pennsylvania Railroad closed the line in the 1950s after decades of problems with rock and dirt slides along the gorge section of its journey.

Mt. Morris Dam Description

The Mt. Morris Dam is located at the northern end of Letchworth State Park near the village of Mt. Morris. Completed in 1952, it is the largest concrete gravity flood control dam east of the Mississippi River. Built primarily of concrete, it has enough of this material in its construction to build a two-lane highway three hundred miles long. It is 1,026 feet long, 221 feet thick at the base, and 790 feet high above sea level. It was built to control 2,476 square miles of watershed. At its peak, the flood pool behind the dam will stretch back 17 miles to the base of the Lower Falls at the south end of the park. It is made up of 21 concrete towers, or monoliths, which use their weight to resist the forces of water and ice in the river. The Mt. Morris Dam is owned and operated by the United State Corps of Engineers, Buffalo Division.

Overlooks Description

Overlooks can be found along the length of Letchworth State Park on the west side of the Genesee River, and in the south and at the dam area on the north side of the river. All overlooks are designed to provide views of the Genesee River and the high walls of the gorge on either side. Some are along the walking trails, particularly the Gorge Trail in the south and the Highbanks Trail in the north. Other overlooks are designed for automobiles to pull off and let passengers hop out and take a quick peek at the dramatic scenery. All overlooks are defined by the stone walls forming a semi-circular shape to allow visitors to the park to feel closer to the drama of the gorge.

Most of the pedestrian overlooks are placed along trails to scenic spots, particularly the Upper, Middle, and Lower Falls. These overlooks are often positioned to allow scenic photographs, and quite often are equipped with large public binoculars to allow the visitor to get an up close and personal view of the scenery. Stone walls at all overlooks protect the viewer from a slip on the gorge edge. The walls in the south end were primarily built by the Civilian Conservation Corps, with some earlier structures from the William Letchworth era and the American Scenic and Historic Preservation Society period. Most of the overlooks in the south end of the part were planned by William Letchworth, along with the paths on which they stand. At the north end of the park many of the overlooks are also shared with the roadways, such as the Dam overlook and the Mt Morris Dam area overlook. A few, such as Conlon Point and Kisil Point are along the Highbanks Trail and are more isolated than the ones approached by automobile.

Automobile overlooks can be found on either side of the park, though more are available in the southwestern side of the park, due to its heavier development and spectacular scenery. The overlooks come in a variety of types and styles. In many cases the overlook is simply a paved or gravel area where cars can pull off of the main road and passengers can disembark. In some cases there is a small grassy island separating the road from the overlook, preventing traffic from moving in certain more dangerous patterns. Another type of overlook provides a loop at the end for visitors to turn around, sending automobiles out the same way they entered the area. This is often used on overlooks that are not directly next to the road. A third type offers parking spaces further back from the cliff edge, requiring visitors to exit from their cars and walk over to the edge. This is sometimes used when a waterway is entering the gorge nearby, and automobile traffic would interfere with the natural path of the water if it was placed closer to the edge.

Park Road Description

While **park roads** do not dominate the landscape of Letchworth State Park, they are an integral part of the landscape design of the south end of the park, and a necessary way to navigate the park's seventeen-mile length. Road design at Letchworth has followed landscape design plans, old settlement roads, and the needs of a rapidly growing park.

The roads within Letchworth's original Glen Iris estate and on the acreage added by the American Scenic and Historic Preservation Society show the importance of views and vistas to the designs of what might be considered a utilitarian structure. During the late nineteenth and early twentieth centuries roads were seen as integral parts of the park. Park use was more passive-the chance to view the scenery and walk among the landscaped plantings was of primary importance. The roads provided planned sequential vistas over the scenery, and in the case of Letchworth, this was the gorge. As the visitor drove from the Portageville entrance to the (then) north end of the park at Wolf Creek on the Park Road, he or she saw the Upper and Middle Falls, the gorge from a variety of perspectives, and the vegetation planted by Letchworth and succeeding generations.

After the road passes the Tea Table and Eddy's picnic area today it changes character. No longer running close to the wall of the gorge, the road widens and loses some of its curves. There are fewer stone walls along the sides of the road, the shoulders widen and are cleared, and the road is less shaded due to the lack of vegetation

close to the road. This road was developed during the 1930s and 1940s, when a scenic drive through the park became less important than moving visitors from one recreation area to another. The road stays far from the edge of the gorge for most of its length, and returns to within a close view near the Highbanks Recreation area. This was in large part a response to the topography - the center section of the park is lower lying than either the north or south ends. This makes it much more prone to flooding, increasing the likelihood of future high maintenance costs.

The side roads in the park follow the character of the main Park Road as it moves through the park. The road to the Lower Falls areas, the Upper Middle Falls Picnic Area, and past Lauterbrunnen are all curvy with stone walls and heavier vegetation on the shoulders. The newer roads past Wolf Creek such as the Gardeau Overlook Road and the Highbanks Camping Area Road are much wider, with less vegetation close to the road and are usually significantly straighter.

Roads within the park boundaries on the east side of the park run only at the south end and to the Corps of Engineers Mt. Morris Dam reservation. The south end roads are not along the edge of the gorge, but in their curviness and extensive vegetation they are similar to those in the southwestern end of the park. However, due to the poor quality of the rock in this section of the park, the roads are often in poor condition due to rock and mud slides. The road to the Corps of Engineers reservation off of Route 408 was designed by the Department of Transportation, and therefore has a completely different character from the others in the park, with more plantings, a different style of stonework on the walls, and a relatively straight and open road design.

One integral part of the road design in the park is the need to move over the multiple bodies of water, ranging from freshets to large creeks, throughout the park. There is not a road bridge across the Genesee River within the boundaries of the park. The bridges are designed to blend in with the road design, not draw attention to the water they are crossing. It is likely that most visitors to the park are unaware of the number of creeks passing under the main park road and flowing into the River.

There are six primary bridges crossing over the creeks within Letchworth State Park. All are single-span concrete arch bridges with stone veneer. The earliest bridge is the **Wolf Creek Bridge**, built in 1927 when the park was still under the management of the American Scenic and Historic Preservation Society. The current **Dehgayasoh Creek Bridge**, built between 1929 and 1930, replaced earlier wooden and steel frame bridges. The **St. Helena Creek Bridge** and the **Bridge over Unnamed Creek** were designed by Charles Ingersoll and William Barhite of Medina. Both bridges were constructed in 1931, around the time the roads were being planned for the northern end of the park. The **De-ga-wa-nus Creek Bridge** is nearly invisible even when driving down the main park road. It was built in 1934 and is probably a replacement for an earlier bridge, though precisely what was replaced is unknown. The **Silver Lake Outlet Bridge** was designed by park architect Charles I. Cromwell and built by the Works Progress Administration. It is the northernmost of the bridges in the park.

Smaller bodies of water and runoff from rainstorms needs to be channeled through **culverts**, of which there are over 900 in Letchworth State Park. The culverts were built from the time of the American Scenic and Historic Preservation Society through the present day. Most are made of stone or are stone veneer over concrete. A single or double arch usually allows the flow of water under the road towards the gorge. An inventory of the culverts and bridges in the park was taken from 1988 through 1990, and is in storage at the Engineering Department, Genesee State Park and Recreation Commission, located at the Administration Building at Letchworth State Park.

Stone Walls Description

Letchworth State Park is often identified with the plethora of stone walls that can be found throughout the park. These walls are characteristic features of the landscape, particularly near the edges of the gorge in the southern end of the park. Stone walls have been built in what is now Letchworth State Park since William Letchworth purchased the property in 1859. The walls that are found in the park today were erected from that time until the present. Most were built in three time periods, the Letchworth Era, the Civilian Conservation Corps Era, and the post-World War II era.[2]

The oldest walls in the park were broken flat limestone dry laid in horizontal patterns. Many had vertical stones laid on top forming a rounded stone palisade on top of the lower stone wall. These date to William Letchworth's initial construction and throughout the nineteenth century and represent a very careful attempt at the rural or rustic appearance. It appears that eventually the stone walls were laid up with mortar but in the same styles. In the 1890s, some of his new masonry was formal rusticated stone.

In the early 20th century and probably coincident with the American Scenic and Historic Preservation Society era were more linear and designed stone walls using quarried flat stones in courses with mortar. Historic photos show that the quarried stone and designed walls were also used by William Letchworth in this century, but to a limited degree. These were used well up into the 1930s and are also typical of much of the Civilian Conservation Corps masonry work. The quarries for the stone were within the park boundaries.

In the early 20th century when automobiles began to be used, large glacial stones were set into the road sides as retaining walls to hold back the earth. Several are still in place across from the Glen Iris Inn. In a similar style, these stones were laid horizontally to form retaining walls. Quarried stones continued to be used up through World War II. These walls almost always had a concrete core, concrete foundation, and large flat quarried top stones.

In 1947, park administrator Gordon Harvey and designer Fred Short came up with the modern park stone wall using wide mortar joints and rounded river rocks. The idea came as a cost cutting idea to avoid quarrying more stones, and instead removing them from the river. These walls were erected all over the park, and are clearly

[2] A study of the stone walls has been completed by Ted Bartlett of Crawford & Stearns Architects and Preservation Planners. The following timeline description comes from his research.

different where they meet old walls. They have been used to replace damaged old walls and in new areas of the park. The basic design is still in use, however, for a period of time in the 1980s black mortar joints were used.

What appears to be the oldest style wall in the park is the stone wall extending up the road by Lauterbrunnen farm. The wall is executed in the early style with vertical stones on top of the walls. However, the wall may have been repaired or reconstructed because of its superb construction and the appearance of a concrete footer underneath it. It is possible that it was rebuilt during the CCC efforts or in William Letchworth's later years.

Trails Description

The 28 trails which run within Letchworth State Park provide visitors with a wide variety of experiences. The trail system has been in development since William Letchworth began to improve his Glen Iris estate. Most of the trails south of the Lower Falls have their origin in Letchworth's plans, even though many of the trails were not completely laid out until the arrival of the Civilian Conservation Corps in 1933. The trails north of the Lower Falls were laid out by the park in the 1940s and 1950s after the federal government had purchased the lands north to Mt. Morris for the dam project. The most recently laid out trails are those of the Genesee Greenway and the Finger Lakes Trail. Many of the trails are connected with sites or roads of historical significance, such as the Genesee Valley Canal, the towns of Gibsonville and St. Helena, and the site of the old mills.

The trail system in the park can be divided into two categories. The first are trails laid out or developed by the Civilian Conservation Corps (CCC). Due to land acquisition patterns, most of these trails are in the southern end of the park. These trails are more highly developed with steps and railings, they offer planned views and vistas, and are set around paths and roads laid out by William Letchworth. There are often developed parking areas near the trailheads to allow easy access to the paths. They are also clearly defined, preventing the likelihood of wrong turns. These paths are more popular with visitors, and during the summer months are often quite crowded.

The northern trails usually branch off the main Park Road and quite often lead to the river bed or a view over the gorge. The paths are mostly dirt, and are more tightly hemmed in by trees and large grasses. There are fewer visitors to these trails, providing more solitude to enjoy nature. However, they are also less well marked, providing many opportunities for misdirection. The exceptions to these rules are the Genesee Greenway and the Finger Lakes Trail, both developed by groups outside the park. Below is a brief description of each of the trails within the park boundaries. A trail map of the park is included in the map section.

Trail 1- The Gorge Trail- 7 miles- moderate
This trail is one of the oldest in Letchworth State Park, originating as a footpath of the Seneca Indians during the 1700s. It is considered the most popular trail in the park due to the number of awe-inspiring vistas as it follows the canyon rim. It is only used for hiking. The influence of Mr. Letchworth's era is evident in some of the stone walls and stairs that grace the trail's corridor along the southernmost section. The stone work continues northward under the supervision of the Civilian Conservation Corps (CCC) during the 1930s until the beginning

of World War II. The trail runs from The Upper Falls Parking Area to the St. Helena Picnic Area "C". Many streams cross paths with Trail 1 as they flow to the Genesee River. Bridges are provided at Wolf Creek, Timber Den Glen, De-ga-wa-nus Creek, and De-ga-ya-soh Creek. Sections of the trail such as the Lower Falls Footbridge Trail (6A) are offshoots of the main Gorge Trail and can be walked by themselves.

Trail 2- Mary Jemison Trail- 2 ½ miles- easy
This woodland country road is wide and gently rolling, providing good treadway for various types of travel. The trail can be used for hiking, biking, horseback riding, skiing, and snowmobiling. Sections of the trail follow the Park perimeter and border on private land. This area was farmland before being acquired by the state of New York. Rows of western red pine occupy the abandoned fields planted in the 1930s by the Civilian Conservation Corps. This is one of the few trails that provide a closer look at the old Arboretum containing sixteen blocks of exotic evergreens. These species are not native to this area. At some points the trail follows the path of the Norfolk-Southern Railroad. The remnants of a reservoir used to provide water for the engines can be found along the south edge of the trail. A track crossing is provided via a stone underpass, constructed during the early years of the railroad.

Trail 2A- Hemlock Trail- 2 ½ miles- easy
This wooded trail travels through rolling terrain once used as farmland. The winding route connects Trails 2 and 3 and follows De-ga-ya-soh Creek. It is used for hiking, biking, horseback riding, skiing, and snowmobiling. Two ponds are encompassed by the Hemlock Trail. The larger, Beaver Pond, was created by resident beaver years ago. The smaller pond was named Pine Pond as it is surrounded by a stand of white pine. It is believed to have been constructed in the 1920s as part of a water supply system for fighting local fires.

Trail 3- The Pond Trail- ¾ mile, easy
The Pond Trail was once the main thoroughfare from Castile to the Letchworth's Glen Iris estate. It was known as the Glen Iris Road. With the pathway wide and the inclines kept to a minimum, it accommodates most modes of travel. The trail is available for hiking, biking, horseback riding, skiing, and snowmobiling. In the center of Trail 3's circuitous path lies Trout Pond and its surrounding wetland. The pond is originally man-made but has been enlarged over the years by beavers. It is stocked twice a year with rainbow trout and fishing is permitted. Picnic tables are located around the perimeter and are accessible by car.

Trail 4- Birch Trail- ¾ mile, easy
This area near the Lower Falls was the site of Chestnut Lawn, the historic homestead of Reuben Jones. Nothing remains of the farm except the old road that travel down to "B" cabins and the Lower Falls Restaurant, and a line of trees where the Chestnut Lawn carriageway once stood. The area incorporates a facility called Group Camping. The land was acquired by Mr. Letchworth and is part of the original estate. Sections of trail follow abandoned field edges and roadways where large sugar maple, red oak, and tulip trees grow.

Trail 5- Lee's Landing Trail- ½ mile, easy
It has been called "The Old Rafting Place", since the days when wooden rafts were constructed and sent down the river to Rochester. The rafts of today are recreational, and it is still the best place in Letchworth State Park to begin a river journey on the Genesee. Fishing in the river is permitted to those possessing a valid New York license. This land was sold to Harvey Lee who owned the land when its' popularity as a landing was in its' heyday. The trail offers one of the few opportunities in the park to walk along the floor of the gorge. The land at the lower end of the trail is subject to spring flooding and the riverbed is forever changing. The trail is available for hiking, biking, and skiing.

Trail 6- Portage Trail- ½ mile, easy
Trail 6 is located on the east side of the Genesee River and parallels the gorge. A small parking area marks the trailhead for this woodland ramble. The name "Portage" was taken from the nearby town of the same name. In the days of the early canoe travelers it was necessary to leave the river at this point and carry, or portage, the boats on land around the treacherous series of falls. Travelling northward on Trail 6, a switchback of stone stairs is encountered and with it the decent to the river. The trail is available exclusively for hiking. The historic stone footbridge spans the gorge in a graceful arch, presenting a unique view of the Lower Falls.

Trail 6A- The Footbridge Trail- ½ mile, moderate
The location of the Footbridge Trail is found on the east side of the Genesee River. It can be approached from the parking lot trailhead and Trail 6 off the east Park Road or from the stone footbridge at the Lower Falls area. This is the narrowest point on the river and the only crossing provided at Letchworth State Park. The Civilian Conservation Corps constructed the bridge in 1934. The trail winds through old growth hemlock and oak. A single stone bridges a stream as it flows to the river. The series of stone stairs enhances the unique character of this short trail.

Trail 7- The Genesee Greenway- 5 ¾ miles, easy
The path taken by the Genesee Greenway is that of the former Pennsylvania Railroad, which ran from the late nineteenth century through the mid-twentieth century. The Greenway is part of a nationwide project connecting the entire country with hiking trails utilizing old abandoned railroad beds. Prior to the railroad era the Genesee Valley Canal system carved the original route through Letchworth State Park in 1836. Remnants of these early transportation systems can be found along the way. A series of bluestone locks are still visible from the canal days at the eastern trailhead. On its journey along the gorge, Trail 7 happens onto an ancient river valley filled with glacial debris. The instability of the rocky deposits presented a continual problem for early travelers of the canals and railroads. The Genesee Greenway can be used by hikers, bikers, horseback riders, skiers, and snowmobilers.

Trail 8- River Road- 2 ¾ miles, easy
The trail, which runs along the eastern side of the gorge, can be accessed at its south end from Route 436 and from the north at the junction of Dygert Road. Trail 8 is a country road that was once was an important

thoroughfare for the early settlers as it parallels the Genesee River and offered accessibility to the mills that once occupied the riverbanks. Today the trail can be enjoyed by visitors interested in hiking, biking, horseback riding, skiing, and snowmobiling. The remnants of old stone pillars, hidden by a tangle of underbrush, mark the south entrance to the trail. This was also the entrance to the Ravenwood Estate owned by Colonel George Williams, a prominent man of the area and friend of Mr. Letchworth. Today the only reminder of Colonel Williams is a family gravestone in a nearby field.

Trail 8A- Blue Jay Road Trail- ½ miles, easy
Originally Blue Jay Road was part of a series of roads that connected the farms and mills along the prospering Genesee Valley. Today this short trail is used by many people as a source of recreation and is known as Trail 8A. There is a continual incline to the trail as it climbs from the east Park Road to River Road, passing through the hardwood forest of American beech, white oak, and hickory. The trail is available for hiking, skiing, biking, horseback riding, and snowmobiling.

Trail 9- Dishmill Creek Trail- 3 miles, moderate
Trail 9 follows Dishmill Creek on its meander to the Genesee River. The majority of the terrain is rolling as the path travels through a mature hardwood forest of American beech, sugar maple, oaks, and hickories. Chestnut log steps can still be seen along the trail, a reminder of the trees that once covered these hills. In some areas swampy conditions exist and foot travel becomes a bit more challenging. Hiking and skiing are allowed in this area. Portions of the trail follow old roadbeds as it drops toward the river. Dishmill Creek empties into the Genesee River just south and across the river from the area called St. Helena. Near the mouth of the stream, a mill produced bowls and dishes manufactured from wood, and the area became known as "Dishmill."

Trail 10- Big Bend- 2 ½ miles, easy
Trail 10 originated as part of an old logging road system. It provided access to the farms and wood lots in the days before the land became part of Letchworth State Park. Camps and mills were set up along the river until the trees were removed. Later entire camps and the crews that operated them were relocated further down the river. It is a steady climb to the top of the Big Bend loop. As the road levels off a stone overlook offers a majestic view of the Genesee River. It is the deepest point in the gorge at 555 feet. The stone work on the overlook was part of a major project done by the Civilian Conservation Corps. A small stone quarry used by the CCC can be seen on the interior of the loop. During the 1930s, CCC camp #23 was located at the base of Trail 10 near the location of Cabin "E" area. A stone chimney near the cabin area is all that is left from the camp. This camp is available for use for snowmobiling, skiing, horseback riding, hiking, and biking.

Trail 10A- The Trillium Trail- ½ mile, easy
This trail branches from Trail 10, following the slope of the land down to the bottomland along the river. Along the upper part of the trail rows of moss covered rocks, hidden among the periwinkle, are evidence that a home had once stood nearby. The wooded trail passes over two streams as they flow down to the river. The overhanging trees give way to the waving fronds of canary reed-grass as the trail approaches the river. Trail 10A is appropriate for hiking and skiing.

Trail 11-Deer Run Trail- 1 ½ miles, easy
Both trailheads for Deer Run are available on the west side of the Park Road. The area was formerly known as Five Corners where main roads from Perry and Castile entered Letchworth State Park. Macadam is still visible on the former roadbed. Some of the area along both sides of trail was used for farming before being purchased by Letchworth State Park. The CCC replanted some of the abandoned fields with western red pine during the 1930s. The trail is now used for biking, hiking, skiing, horseback riding, and snowmobiling.

Trail 12- Seneca Trail- ¾ mile, moderate
Trail 12 was once a public road that crossed the river at St. Helena and traveled up the riverbank to join River Road. There was no longer a need for the road when the town ceased to exist and the bridge was abandoned in the 1950s. The steep incline and channeling affect of the water run off can make this a challenging hike. Hiking and skiing are the only activities allowed on this trail.

Trail 13- St. Helena- ¾ mile, moderate
There are three access points for Trail 13. The shortest route is the one leading south from the lower St. Helena parking lot. This is also the location where the rafts and canoes are picked up from their whitewater journey on the Genesee. The other two trailheads are on the main Park Road and are sections of the original St. Helena Road. A continuous downward grade through a mixed hardwood forest brings the trail to the river flats and the site of the once thriving community. The path is used by bicyclists, hikers, and skiers. The construction of the Mt. Morris Dam in 1948 caused all of the land located south along the Genesee River to become property of the federal government. St. Helena was part of the flood control plain and soon the last remaining residents moved out. During the flood of 1972 all visible remnants of the homes were destroyed. The only remaining artifacts are the stone embankments of the bridge that once spanned the river.

Trail 14- Gardeau Trail- ½ mile, moderate
The trailhead for Trail 14 adjoins the Park Road and parallels the Gardeau Overlook road for a short distance. The splashing of water can be heard as a stream courses through the shady depths of a ravine along the side of the path. The word Gardeau has its origins with the Seneca people, the translation being an area where "the walls go up." The rock cliffs on the opposite side of the river may possibly be an explanation. The construction of the Mt. Morris Dam at the north end of the park has created periodic flooding throughout the river valley, leaving layers of silt and clay behind. The trail winds through the twisted poplar and sycamore trees as the path approaches the riverbank. The trail is narrow, and is only appropriate for hiking and skiing.

Trail 15- Smokey Hollow Trail- 2 ¼ miles, moderate
A trailhead for Trail 15 can be found on the Park Road near the Smokey Hollow overlook. The course drops down to the river flats and returns to a location further north on the Park Road. The wooded path follows a ravine shaded by mature white pine and Eastern hemlock. A sudden turn in the trail and the flats of the river lay ahead. The incline back to the Park Road travels through an area of old clearings, possibly the remnants of farm

fields slowly returning to forest. The winter air combining with the mist of the river gave the valley the name "Smokey Hollow." The trail is ideal for hiking and skiing.

Trail 16- Bear-Hollow Trail- 2 miles, moderate
Parking and trail access to Bear-Hollow are located on River Road on the east side of the park. Maps and registration forms are available at the trailhead, as this is also an entrance to the Finger Lakes Trail system. There are three branches to Trail 16, including two vistas and a loop. Trail 16 borders on the fields of local farmers before it turns towards the river. At one time the land under foot was also farmed extensively. Just before Trail 16 crosses the Finger Lakes Trail the surroundings change to a forest of hardwoods. The rows of giant white oak and sugar maple stand among the piles of fieldstone, signifying long forgotten fence lines. The terrain begins to slope downward as the path nears the river. It ends abruptly offering a view overlooking the river as it winds through the flood plain.

Trail 17- Big Flats Trail- 1 ¼ miles, moderate
The entrance for Trail 17 is located in the small parking lot after entering the Camping Contact Station. This is a well-used trail due to the neighboring camping area consisting of 270 sites. The portion of the trail at upper elevations follows the unused remains of a public road once connecting St. Helena to the Gibsonville area. Shortly after beginning the journey to Big Flats a lone gravestone can be seen among the trees. It is believed to be a remembrance of a former resident of Gibsonville who farmed this area. This trail is appropriate for hiking and skiing. The path gradually descends to the flood plain near the river.

Trail 18- Kisil Point Trail- 1 ¾ miles, moderate
Trail 18 can be entered from the Park Road. Another option is the entrance at No. 100 camping loop at the Highbanks Tent and Trailer Camper Area. When entering from the Park Road, a narrow wooden bridge greets the hiker. After spanning a rocky stream the trail follows a gradual incline into a forest of white pine, white ash, and basswood. Most of the trees occupy recovered farm field and their size represents 50 to 60 years of growth. The Kisil family farmed the land in this area until it was purchased as part of Letchworth State Park.
The trail widens near the Highbanks Camping area as it approaches the historic log shelter constructed by the Civilian Conservation Corps in the 1930s. Nearby, stone picnic tables stand among the mayapple and towering red pines. Kisil Point is the location between the junction of the Genesee River and the Silver Lake Outlet. Two branches of the trail running parallel along each rim offer the views of both valleys. They rejoin just as the trail begins a sharp downward slope through patches of blueberries, witch hazel, and flowering dogwood. Hiking and skiing are allowed on the whole trail, while biking can only be ridden away from the gorge edges. Trail 18 terminates at Kisil Point with a breathtaking view of the Genesee River Valley.

Trail 19- Gibsonville Trail- ½ mile, easy
Trail 19 offers two trailheads just north of the Silver Lake Outlet on the Park Road. On the west side a short stroll through the wooded roadside opens into a grassy meadow. The trail crosses the Park Road and follows the Silver Lake Outlet to the site of the abandoned village of Gibsonville. Henry Gibson purchased this property in the early 1800s. Mills soon sprang up along the rushing stream and the town prospered until the late 1890s. The

major source of employment was a paper mill situated on the waterfalls. A fire caused the closure of the mill and many residents left the area. The Civilian Conservation Corps used this site for Camp #17 from 1933 to 1937. The stone chimney and many other masonry ruins found at Gibsonville are from this time period. The trail may be used for hiking, biking, and skiing.

Trail 19A-Chipmunk Trail- ¼ mile, moderate
Trail 19A can be accessed from the Park Road or by following Trail 19. At the intersection on Trail 19 the roar of the Paper Mill Falls can be heard as the trail begins an upward climb to the Park Road. The old Gibsonville road becomes Trail 19A as stately Eastern hemlock and mixed hardwoods extend above the roadside. The trail is appropriate for hiking only.

Trail 20- Highbanks Trail- 4 ¾ miles, easy to moderate
North access to Trail 20 can be gained off the Park Road near the Mt. Morris admission gate. A trailhead is also available at Hog's Back parking lot, as well as access from Trail 19A or Cabin "C" area. The course taken by the trail between these locations is that of the old Highbanks Road. The trail follows the gorge along the Genesee River offering panoramic views from many locations. Fencing has been provided along the gorge as a protective barrier for the convenience of the public. Points of interest on the Highbanks Trail include the Mt. Morris Dam area. The trail comes upon a more heavily used section as it enters the Highbanks Recreation Area. The Hogsback Overlook allows a unique view of the reformation of the Genesee Valley in progress. Although the process will take many, many years, evidence of change in the riverbed can be seen created by the river's "entrenched meander." The route of a Civilian Conservation Corps road, used in the 1930s, begins the section of trail from the Hogsback parking lot. The old road is soon lost, as the path becomes more rugged and narrowly winds through several slide areas. The numerous turns and small log bridges help to keep the hike interesting. At times the trail encounters a line of trees or old stone walls, evidence that some areas were once farmed fields. The trail can be used for hiking and biking.

Trail 21- Powerline Trail- ¾ mile, moderate
The trailhead for the Powerline Trail opens onto River Road on the east side of the park, just north of Ridge Road. The route parallels and intersects with the powerline right of way giving the trail its name. Approximately ½ mile from the River Road trailhead there is an intersection with the Finger Lakes Trail. The terrain begins to descend in the direction of the river. The trail may be used for hiking and skiing. As the trail approaches the flood plain the trees disappear creating a wide-open view of the river basin below.

Trail 22- Sycamore Trail- ¾ mile, moderate
A gray weather-beaten barn along River Road (outside the park boundaries) on the east side of the river is sometimes used as a guide for the Trail 22 trailhead. A steep incline from River Road onto the narrow strip of Park property allows for an entrance between the towering cow parsnip and blackberry bramble. Stones placed on the grassy pathway lead through an open meadow where common milkweed and tall buttercup crowd the trail. Soon after entering the forest Trail 22 crosses the Finger Lakes Trail and begins a downward course

towards the river. Massive Eastern sycamore trees line the trail as it wanders along an old roadway ending suddenly high above the river. The vegetation changes to the coarse grasses and willows commonly found in the flood plain.

Finger Lakes Trail, Letchworth Branch Trail- 21 ½ miles, moderate
The Finger Lakes Trail (FLT) Conference has established an 800-mile trail system throughout New York State, of which a 21 ½ mile section travels through Letchworth State Park. This branch was dedicated in 1980 and given the name the Letchworth Branch. It parallels the Genesee River, having an access point in the north at the Mt. Morris Dam parking lot and then at Route 436 in the south near the town of Portageville. The natural beauty of the falls area influenced the direction of the FLT to link with the park trail system. This southernmost section also follows the path of the 1840s Genesee Valley Canal alternately with the old Pennsylvania Railroad bed. Travelling northward the FLT joins Trail 8 for a short distance, then turns off the beaten path to the solitude of the forest. Even though the Letchworth Branch Trail is very popular, it is rare to encounter another hiker along the northern portion due to its 18-mile length and the fact that no cross roads enter this part of the trail. However, there are 10 access points from River Road to the FLT allowing the trail to be hiked in shorter segments. As the trail weaves through the woodland a variety of environments are encountered, from ravines with cascading freshets to old farm fields.

Letchworth State Park
Resource List

OMB No. 10024-0018

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
12108.00 0034	10 -Portageville Entrance Area	Contact Station-Portageville Entrance	One–story stone and wood structure with asphalt-shingled gable roof. Built in two sections with one roof stretching over both and the road that runs between. Multi-frame windows on both sections.	1959	Non-contributing due to age only	Genesee Falls
12108.00 0035	10 -Portageville Entrance Area	Entrance Signs	Two metal signs with fieldstone bases with the words "Letchworth State Park Entrance"	unknown	Non-contributing due to age only	Genesee Falls
12108.00 0036	11 -Upper Middle Falls Picnic Area	Stone Water Fountains	At least four stone water fountains scattered around the lower picnic area. Fieldstone set in mortar with a wider stone base.	ca. 1930	Contributing	Genesee Falls
12108.00 0021	11 -Upper/Middle Falls Picnic Area	Comfort Station at Middle Falls	One-story stone building with concrete slab foundation and asphalt-shingled hip roof. Square paneled columns and exposed rafter tails. Multi-light wood windows and a bead board porch ceiling. Builder: Albert Lindquist & Co., Jamestown, NY.	ca. 1913	Contributing	Genesee Falls
12108.00 0038	11 -Upper/Middle Falls Picnic Area	Comfort Station at Upper Falls	One-story frame building with concrete slab foundation, exterior walls sided with cedar shakes, and an asphalt-shingled roof. High windows and exposed rafter tails on the overhang. Builder: N.H. Gath of Warsaw, NY.	1929-1930	Contributing	Genesee Falls
12108.00 0039	11 -Upper/Middle Falls Picnic Area	De-ga-wa-nus Creek Bridge	Concrete bridge with fieldstone veneer. See also "Bridges" geographic area.	1934	Contributing	Genesee Falls
12108.00 0040	11 -Upper/Middle Falls Picnic Area	De-ga-wa-nus Creek Foot Bridge	Stone arch footbridge over creek along Upper Falls Trail. Two low pillars at each end of structure. See also "Bridges" geographic area.	1930	Contributing	Genesee Falls
12108.00 0041	11 -Upper/Middle Falls Picnic Area	Foot Bridge along Upper Falls Trail	Steel and concrete footbridge along Upper Falls Trail, approximately 125 feet long. See also "Bridges" geographic area.	1931	Contributing	Genesee Falls
12108.00 0042	11 -Upper/Middle Falls Picnic Area	Middle Falls Picnic Shelter	One-story frame shelter with stone floor and asphalt-shingled gable roof. Log timber	ca. 1930	Contributing	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
			frame construction with mortise and tenon design, stone fireplace, and wooden tables. Architect: Charles I. Cromwell. (?)			
12108.00 0043	11 -Upper/Middle Falls Picnic Area	Stone Picnic Tables	At least twenty-four stone slab tables with horizontally piled stone supporting pillars. Vertical stones support the stone slab seats along the sides. Placed throughout the upper picnic area.	ca. 1933	Contributing	Genesee Falls
12108.00 0044	11 -Upper/Middle Falls Picnic Area	Stone Steps	Two sets of stone steps leading between the upper and lower parts of the picnic area. Flat stone slabs set into the hillside with rounded stones placed along the sides. Steps curve slightly as they rise to the upper picnic area.	ca. 1930	Contributing	Genesee Falls
12108.00 0045	11 -Upper/Middle Falls Picnic Area	Upper Falls Parking Lot near High Bridge	Small asphalt-paved parking lot on a small plateau near the High Bridge.	pre-1940	Contributing	Genesee Falls
12108.00 0046	11 -Upper/Middle Falls Picnic Area	Upper Falls Shelter	One-story, open-sided frame shelter with concrete slab foundation and asphalt-shingled hip roof. Exposed rafters and square stone pillars. Originally a refreshment stand. Architect: Charles I. Cromwell. (?)	ca. 1930/ discussed 1927 by ASHPS	Contributing	Genesee Falls
12108.00 0047	11 -Upper/Middle Falls Picnic Area	Upper Middle Falls Parking Lot	Large asphalt paved parking lot with grassy islands around the edges.	ca. 1930	Contributing	Genesee Falls
12108.00 0048	11-Upper/Middle Falls Picnic Area	Food Concession at Upper Falls	One-story stone building with asphalt-shingled hip roof with small gable roof over front entrance. Windows along three sides of the building. Stone fireplace chimney on south elevation.	1969	Non-contributing due to age only	Genesee Falls
12108.00 0049	11-Upper/Middle Falls Picnic Area	Marker at Upper Falls	Metal sign on post "Portage Bridge Replaces Largest Wooden Bridge in the	1934	Contributing	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
		Parking Lot	World Built in 1852. 300 Acres of Timber used in Construction. Burned in 1875."			
12108.00 0050	11-Upper/Middle Falls Picnic Area	Trail from Middle Falls level up to top of Upper Falls	Wooded trail with trees and overlooks spaced along the path. A stone wall with variously designed overlooks runs along the trail on the east, or gorge, side. Most of wall is stone construction, other sections are made up of stone piers with round wood log railings. Designed with switchbacks. Single-arch stone veneer bridge crosses ravine. The original trail was laid out by William Pryor Letchworth by 1907, expanded by the men of the Civilian Conservation Corps between 1933 and 1937. Steps along the traill are stone slab or square wooden beam. One section is concrete on stone pilings with metal pipe railing. Part of Trail 1, the Gorge Trail. See also "Trails" under park wide geographic area.	1930	Contributing	Genesee Falls
12108.00 0051	12- Glen Iris Area	Miscellaneous features of William Webster's landscape design	Trees, shrubs, stone work, and other remnants of landscaping planned by William Webster for William Letchworth. Resources cited in: George W. Curry and Associates. The Homestead Grounds Landscape Preservation Plan, Syracuse, New York, 1997.	1860-1910	Contributing	Genesee Falls
12108.00 0008	12-Glen Iris Area	Glen Iris Inn	Two- and three-story frame house with portico. Cross-gabled roof with asphalt shingles. Clapboard siding except at the east and south elevations at portico where flush board siding is used. Settlement era house. Oldest section built by Allvah Palmer ca. 1830 on a former site in front of the present	Oldest section built in 1830; major alterations/additions by Letchworth 1879-1880.	Contributing	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
			location. Michael Smith purchased the house in 1832 and by 1850 had moved the house to its present location and built the two-story Greek Revival section. House acquired by W.P. Letchworth in 1859. Mr. Letchworth made alterations and additions in 1879/1880. He lived here until his death in 1910. Later changes by the American Scenic and Historic Preservation Society and NYS Parks.			
12108.00 0052	12-Glen Iris Area	Glen Iris Parking Lot	Large asphalt-paved parking lot to the south of the Glen Iris Inn.	ca. 196	Non-contributing	Genesee Falls
12108.00 0053	12-Glen Iris Area	Glen Iris Parking Lot closest to fish pond	Asphalt-paved parking lot shaded by trees, mostly for drop off and pick up of visitors to the Glen Iris Inn.	ca. 1946	Contributing	Genesee Falls
12108.00 0054	12-Glen Iris Area	Goldfish Pond	Small pond with fountain on the north side of the Glen Iris Inn. Designed as a small lake with a rustic bridge and a high fountain. Today the driveway hems in the lake, although the fountain is still functional.	1860-1876	Contributing	Genesee Falls
12108.00 0055	12-Glen Iris Area	Marker above the Middle Falls	Metal plaque honoring William P. Letchworth "In Grateful Memory of William Pryor Letchworth L.L.D. Humanitarian Conservationist Donor of Glen Iris and His Estate Comprising the Original 1000 __ of the Park Includes Upper, Middle, and Lower Falls so that this Gorge Might Remain a Place of Inspiration and Beauty Forever."	1957	Non-contributing due to age only	Genesee Falls
12108.00 0056	12-Glen Iris Area	Marker in front of Museum	Metal plaque on stone in front of Pioneer and Indian Museum "To Honor the Memory of Wolcott J. Humphrey Chairman 1910-	1961	Non-contributing due to age only	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
			1959 His Unfailing Interest and Keen Foresight in the Development of Letchworth State Park Remains an Inspiration for all."			
12108.000057	12-Glen Iris Area	Memorial Trees	In vicinity of Glen Iris. Kentucky Coffee Tree- Planted by the Hon. George W. Clinton, c. 1875 White Oak- Planted by Martin B. Anderson, July 1877 Ohio Buckeye- Planted by Rev. Albert G. Byers, April 14, 1881. Ohio Buckeye- Planted by Orin Lehmann, 1993 Tuliptree- Planted by the Hon. William Howland on May 26, 1892 Ginkgo- Planted by the Hon. Philip C. Garret on May 5, 1893 Letchworth hemlock- unknown date	Planted beginning in 1860s	Contributing	Genesee Falls
12108.000058	12-Glen Iris Area	Museum Comfort Station	One-story stone comfort station with an asphalt-shingled gable roof with metal frame windows and an attached water fountain.	Pre-1941	Contributing	Genesee Falls
12108.000059	12-Glen Iris Area	Parking Areas on either side of the Museum	Small multi-space parking areas off the main park road.	ca. 1939	Contributing	Genesee Falls
12108.000060	12-Glen Iris Area	Pinewood Lodge	One-story stone-faced building with asphalt-shingled gable on hip roof. Large windows on front of building, seven doors leading to the rooms. Air-conditioning units in each window. Garage architect: Charles E. Mott.	Earliest portion was a garage built in 1928; converted to a motel in 1954	Contributing	Genesee Falls
12108.000061	12-Glen Iris Area	Stairs and Trail behind Museum leading to the	Stone steps leading up the hill toward the Council Grounds. Flat stone slabs sided with small rounded boulders. Upper steps	1931	Contributing	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
		Council House Grounds	made from square beams embedded in the hillside. Lower steps changed from leading from the direction of ice house to a more westerly direction. Wooden railings along upper path.			
12108.000009	12-Glen Iris Area	William Pryor Letchworth Museum	One-story building of hollow tile and concrete construction with random coursed rubble and broken stone facing. Asphalt-shingled jerkinhead roof. Colonial Revival entrance. Built on the site of W.P. Letchworth's formal gardens. The museum was built to house Mr. Letchworth's library and artifact collection. Formerly called the Pioneer and Indian Museum. Architect: Edward A. Phillips of Warren, PA.	1912	Contributing	Genesee Falls
12108.000063	13-Council House Grounds Area	Grave Site of Mary Jemison	Mary Jemison's body was placed in a new casket, inside a stone sarcophagus and covered with concrete. The Mary Jemison Monument/Statue marks the gravesite.	1874	Contributing	Genesee Falls
12108.000064	13-Council House Grounds Area	Mary Jemison Monument/ Statue	The marble pedestal originally marked the new grave in 1874. The four foot by four foot and five feet high tooled white marble classical pedestal rested on a one and a half foot bluestone plinth. The approximately seven foot high bronze statue was added to the top of the marble monument in 1910 by sculptor Henry K. Bush-Brown.	1874, 1910	Contributing	Genesee Falls
12108.000065	13-Council House Grounds Area	Memorial Trees	In vicinity of Council House Grounds. Black Walnut- Planted by Thomas Jemison, 1872 Black Walnut- Planted by Kate Osborne, 1875 White Pine- Planted by Captain Charles Johnson, 1873	Plantings beginning in 1872	Contributing	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
			White Pine- Plated by Charles Jones, 1879 White Oak- Planted by Mrs. David Gray and her children, ca.1908			
12108.00 0066	13-Council House Grounds Area	Miscellaneous features of William Webster's landscape design	Trees, shrubs, stone work, and other remnants of landscaping planned by William Webster for William Letchworth. Resources cited in: George W. Curry and Associates. The Council House Grounds Landscape Preservation Plan, Syracuse, New York, 1996.	1860-1910	Contributing	Genesee Falls
12108.00 0006	13-Council House Grounds Area	Nancy Jemison Cabin	One-story 21× 26 foot log cabin with dirt floor and wood-shingled gable roof extending into a porch supported by four wooden posts. Chimney located on the west elevation.	ca. 1780; moved here from Gardeau Flats in 1880 and was re-built by 1884.	Contributing	Genesee Falls
12108.00 0068	13-Council House Grounds Area	Parking Lot at end of Council House Grounds Road	Small asphalt-paved parking lot. No dividers, stone curbing.	ca. 1920s	Contributing	Genesee Falls
12108.00 0069	13-Council House Grounds Area	Path from Glen Iris to the Council House Grounds	Constructed as a carriage road for Mr. Letchworth prior to the development of the Council Grounds. Changed to a pedestrian path by the 1890s. Abandoned by the American Scenic and Historic Preservation Society as they made changes to the Council Grounds. The path is still visible and accessible.	ca. 1860s	Contributing	Genesee Falls
12108.00 0007	13-Council House Grounds Area	Seneca Council House	One-story log building with a wood-shingled gable roof. Wood siding at gable ends. Doors on both the front and rear of the building. Small square of fieldstone at west elevation where chimney was once located.	mid-18th century	Contributing	Genesee Falls
12108.00 0071	14-Lauterbrunnen Area	Dragoons Monument	Stone obelisk commemorating the 136th New York Infantry that fought in the Civil	Erected in 1903; moved in 1917	Contributing	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
			War			
12108.00 0072	14-Lauterbrunnen Area	Garage near Lauterbrunnen	One-story frame building with asphalt-shingled gable roof and clapboard siding.	1959	Non-contributing due to age only	Genesee Falls
12108.00 0073	14-Lauterbrunnen Area	Lauterbrunnen Barn	One-story frame bank barn with board and batten exterior walls and asphalt-shingled gable roof. Built in two sections. Double sliding doors with cross-patterned wood panels on both sections.	ca. 1881	Contributing	Genesee Falls
12108.00 0023	14-Lauterbrunnen Area	Lauterbrunnen Farmhouse	Two-story frame residence with wood siding, stone foundation, and asphalt-shingled gable roof. Sawtooth shingles around the doors, echoed in barge boards. King's post trusses in gables. This was one of five farms of the Glen Iris estate. Renovations done by park architect Charles I. Cromwell in 1947.	ca. 1881; renovated in 1947	Contributing	Genesee Falls
12108.00 0074	14-Lauterbrunnen Area	Lauterbrunnen Ice House	Stone building with asphalt-shingled gable roof with small wooden shingles in the gable ends.	ca. 1881	Contributing	Genesee Falls
12108.00 0075	14-Lauterbrunnen Area	Park Residence at Lauterbrunnen	Two-story frame Bungalow residence with clapboard walls and asphalt-shingled gable roof. This house may have been built near the site of the present stone house across from Inspiration Point	ca. 1915, moved ca. 1925	Contributing	Genesee Falls
12108.00 0076	15-Commission House	Parking Lot	Small asphalt-paved parking lot. No islands, no curbing.	ca. 1937	Contributing	Genesee Falls
12108.00 0077	15-Commission House Area	Commission House	One-and-one-half-story frame building with rustic clapboards and wood-shingled gable roof. Swiss chalet style, stone chimney, porch on east elevation with three sets of doors from the interior. Built by Attica Prison labor.	1937	Contributing	Genesee Falls
12108.00	16-South	Electrician	One-story concrete slab on grade building	1976	Non-	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
0078	Maintenance Area	Aerial Bucket Building	with board and batten walls and asphalt-shingled gable roof.		contributing	
12108.00 0079	16-South Maintenance Area	Equipment Building-Pole Barn	One-story wood frame building with board and batten walls and asphalt-shingled gable roof.	1979	Non-contributing	Genesee Falls
12108.00 0080	16-South Maintenance Area	Fuel Island Building	One-story wood frame building on concrete slab with fiberglass walls and a flat roof.	1984	Non-contributing	Genesee Falls
12108.00 0081	16-South Maintenance Area	Garage at South Maintenance Area	One-story frame garage with board and batten walls and asphalt-shingled gable roof. Eight garage doors on front elevation.	1934	Contributing	Genesee Falls
12108.00 0082	16-South Maintenance Area	Misc. Equipment Building	One-story building with board and batten walls. Former wood bin.	Date unknown; moved here in 1974	Non-contributing	Genesee Falls
12108.00 0083	16-South Maintenance Area	Misc. Equipment Building	One-story frame building with board and batten walls and an asphalt-shingled shed roof.	Date unknown; moved here in 1974	Non-contributing	Genesee Falls
12108.00 0084	16-South Maintenance Area	Misc. Equipment Building	One-story frame building with board and batten walls and an asphalt-shingled shed roof.	Date unknown; moved here in 1974	Non-contributing	Genesee Falls
12108.00 0085	16-South Maintenance Area	Misc. Equipment Building	One-story frame building with board and batten walls and an asphalt-shingled shed roof.	Date unknown; moved here in 1974	Non-contributing	Genesee Falls
12108.00 0086	16-South Maintenance Area	Misc. Equipment Building	One-story frame building with board and batten walls and an asphalt-shingled shed roof.	Date unknown; moved here in 1974	Non-contributing	Genesee Falls
12108.00 0087	16-South Maintenance Area	Pole Barn	One-story wood frame building with board and batten walls and an earthen floor.	1981	Non-contributing	Genesee Falls
12108.00 0088	16-South Maintenance Area	South Maintenance Garage East	One-story concrete slab on grade building of concrete blocks with an asphalt-shingled gable roof.	1955	Non-contributing	Genesee Falls
12108.00 0089	16-South Maintenance Area	South Police Garage	One-story frame garage with concrete slab on grade, clapboards on exterior, and asphalt-shingled gable roof. 5 sets of double doors on front elevation, each with 4 over 4	ca. 1920	Contributing	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
			windows and exposed metal hinges.			
12108.00 0090	16-South Maintenance Area	Storage Barn	One-story frame building with concrete slab on grade, clapboard exterior walls, and asphalt-shingled hip roof.	Pre-1900	Contributing	Genesee Falls
12108.00 0091	16-South Maintenance Area	West Concrete Block Garage	One-story concrete block building on concrete slab with an asphalt-shingled gable roof.	1971	Non-contributing	Genesee Falls
12108.00 0092	17-Trout Pond Road Area	Pioneer Cemetery	Small cemetery with gravestones. Six of the ten identified families found in the burial grounds were early settlers.	Early 19th century; the last burial was in 1915	Contributing	Genesee Falls
12108.00 0093	17-Trout Pond Road Area	Pump House-Trout Pond	One-story wood frame building on concrete slab with board and batten walls and asphalt-shingle gable roof.	1976	Non-contributing	Genesee Falls
12108.00 0094	17-Trout Pond Road Area	Reproduction Schoolhouse	One and a half-story frame building with clapboard walls and an asphalt-shingled gable roof with a square bell tower. Used for concessions storage. Archaeological investigations and historical research done on the former schoolhouse site prior to the reconstruction.	1987	Non-contributing due to age only	Genesee Falls
12108.00 0095	17-Trout Pond Road Area	Storage Garage	One-story frame garage with clapboard walls. Space for four cars. Built near the location of the first park offices.	1933	Contributing	Genesee Falls
12108.00 0096	17-Trout Pond Road Area	Trout Pond	Small man-made lake, originally used for drinking water and fire protection.	ca. 1931	Contributing	Genesee Falls
12108.00 0097	17-Trout Pond Road Area	Trout Pond Parking Lot	Small gravel parking area at east end of the lake under trees.	ca. 1950	Contributing	Genesee Falls
12108.00 0098	18- Traillside Lodge Area	Trailside Lodge Parking Lot	Large open asphalt-paved parking lot with concrete curbing.	ca. 1975	Non-contributing	Genesee Falls
12108.00 0099	18-Trailside Lodge Area	Misc. Equipment Building-Radio Tower	One-story concrete slab on grade wood frame building with board and batten walls and an asphalt-shingled gable roof.	ca. 1969	Non-contributing	Genesee Falls
12108.00	18-Trailside	Misc. Ski	Two-story wood frame building with a	1969	Non-	Genesee Falls

Letchworth State Park
Resource List

OMB No. 10024-0018

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
0100	Lodge Area	Building- Lift House	crushed stone floor, board and batten walls, and stairs on the front and rear of the building.		contributing due to age only	
12108.00 0101	18-Trailside Lodge Area	Misc. Ski Building near Trailside	One-story wood frame building with board and batten walls and an asphalt-shingled gable roof. Used as a warming hut.	1983	Non-contributing	Genesee Falls
12108.00 0102	18-Trailside Lodge Area	Storage-Near Lift House	One-story wood frame building with board and batten walls and an asphalt-shingled gable roof.	1976	Non-contributing	Genesee Falls
12108.00 0103	18-Trailside Lodge Area	Storage-Trailside	One-story wood frame building with board and batten walls and an asphalt-shingled gable roof.	1976	Non-contributing	Genesee Falls
12108.00 0104	18-Trailside Lodge Area	Sunken Lawn-Ice Rink	Rounded sunken area near Trailside Lodge. Formerly used as an ice skating rink. Small water conduit at southern end.	c.a. 1970s	Non-contributing due to age only	Genesee Falls
12108.00 0105	18-Trailside Lodge Area	Trailside Lodge/Picnic Shelter	One-story T-shaped building with an asphalt-shingled gable roof and board and batten walls. Exposed rafter tails at gable ends. Small windows placed high on the walls.	1975	Non-contributing due to age only	Genesee Falls
12108.00 0106	19- Inspiration Point Area	Memorial Boulder	On Gorge Trail. Text reads: God Wrought For Us This Scene Beyond Compare/ But One Man's Loving Hand Protected It/ And Gave It To His Fellow Man to Share" Sarah Evans Letchworth	Discussed-1924; in place by 1950	Contributing	Genesee Falls
12108.00 0107	19 -Inspiration Point Area	Inspiration Point Comfort Station	One-story stone building with asphalt-shingled gable roof. Two-pane windows placed high on the walls.	1951	Contributing	Genesee Falls
12108.00 0108	19 -Inspiration Point Area	Inspiration Point Foot Bridges	Small bridges over man-made pond. See also "Bridges" geographic area.	1939	Contributing	Genesee Falls
12108.00 0109	19 -Inspiration Point Area	Pond	Small man-made pond near Inspiration Point overlook. C-shaped, rock lined, with a small bridge at the east end. Water comes in	Pre-1930	Contributing	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
			from a creek to the south.			
12108.00 0110	19 -Inspiration Point Area	Stone House	One-and-one-half-story stone house with side-gabled roof and dormers. Porch on north elevation with a gabled roof, six over six double hung sash windows, stone wall behind the house. Designed in the Colonial Revival Style. Built by CCC. Architect: Charles I. Cromwell.	1938-39	Contributing	Genesee Falls
12108.00 0111	19-Inspiration Point Area	Information board	Wooden two-sided board with gable roof and area for hanging notices.	unknown	Non-contributing	Genesee Falls
12108.00 0112	19-Inspiration Point Area	Inspiration Point parking lot	Small asphalt-paved parking lot with stone curbing and a grassy median with trees.	Pre-1930	Contributing	Genesee Falls
12108.00 0113	20- Labor Center-Administration Area	Administration Headquarters Parking Lot	Asphalt-paved parking area located to the south of the Administration Headquarters. Divided into three sections by grassy islands with trees, no curbing.	ca. 1940	Contributing	Genesee Falls
12108.00 0114	20 -Labor Center-Administration Area	Barn at Prospect Home	L-shaped main block with gable roof and novelty siding. Garage addition to the south side with gable roof and clapboard siding. Small office in same style on the northwest corner. Modern garage door on front elevation of main block. Original sliding doors and hay door with hoist at rear. Small cupola at center of main block. Currently used for Central Stores.	ca. 1880 with alterations and additions	Contributing	Genesee Falls
12108.00 0115	20 -Labor Center-Administration Area	Greenhouse	One-story gable roof frame building with board and batten exterior walls. Glass enclosed greenhouse extension at the rear. This building was originally part of the Chestnut Lawn complex.	Late 19th century; moved to present site in 1912	Contributing	Genesee Falls
12108.00 0116	20 -Labor Center-Administration Area	Labor Center Carpenter Shop	One-story frame building with concrete slab on grade, board and batten exterior walls, and asphalt-shingled gable roof.	ca. 1938	Contributing	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
12108.00 0019	20 -Labor Center-Administration Area	Labor Center Saw Mill	One-story frame building with board and batten exterior walls and asphalt-shingled gable roof; shed roof wing on west side.	ca. 1930; moved to this site and re-built in 1934	Contributing	Genesee Falls
12108.00 0118	20 -Labor Center-Administration Area	Lumber Storage at Mill Yard	One-story building with board and batten walls and an asphalt-shingle gable roof.	1985	Non-contributing	Genesee Falls
12108.00 0119	20 -Labor Center-Administration Area	Lumber Storage Building at Sawmill	One-story frame building with board siding and a gable roof.	ca. 1935	Contributing	Genesee Falls
12108.00 00120	20 -Labor Center-Administration Area	Misc. Equipment Building-Splitter	One-story wood frame open structure with an asphalt-shingle gable roof.	1983	Non-contributing	Genesee Falls
12108.00 00121	20 -Labor Center-Administration Area	Police Storage Building at mill yard	Frame building with asphalt-shingled roof and log siding. Was originally a cabin in Cabin Area C; was later moved to the mill yard for storage. Built by CCC Architect: Charles I. Cromwell	ca. 1935	Contributing	Genesee Falls
12108.00 0122	20 -Labor Center-Administration Area	Prospect Home	Two-and-one-half-story frame residence with clapboards and flush board siding and asphalt-shingled jerkinhead roof. Settlement era house of Perry and Sally Jones with alterations done by Letchworth after purchasing it in the 1870s. Although this is a settlement era house its present appearance largely reflects the Letchworth Era. This was one of the five farms of the Glen Iris estate. Present Superintendent's House.	Early to mid-19th century with 1870s additions and alterations.	Contributing	Genesee Falls
12108.00 0123	20 -Labor Center-Administration Area	Storage Building at mill yard	Log building with asphalt-shingled gable roof. Originally built as a contact station at the Castile entrance. Was moved to the mill yard in the 1980s for use as a storage building.	ca.1930s	Contributing	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
12108.000124	20-Labor Center-Administration Area	"Buffalo Tom" Jemison Log Cabin	The deteriorated wooden remains of a Seneca Reservation Period structure owned by the grandson of Mary Jemison. The only surviving structure from the Squawkie Hill Reservation. Now dismantled and in storage in Letchworth State Park at the Labor Center.	1818; stood on original location until 1969	Contributing	Genesee Falls
12108.000125	20-Labor Center-Administration Area	Row of Trees	A double row or alleé of trees leading from the east , or river side to Prospect Home at the west side.	mid- to late-nineteenth century	Contributing	Genesee Falls
12108.000126	20-Labor Center-Administration Area	Administration Headquarters	One-story stone veneer building with cross-gable roof and clapboards in gable ends. Stone pillars at entranceway. 1995 additions to the east and north in same style with gable on hip roofs. Enclosed walkway from original block to north addition. Built by Attica Prison Labor	1950	Contributing	Genesee Falls
12108.000127	20-Labor Center-Administration Area	Storage Building at Mill yard	Log building with asphalt-shingled gable roof. Moved to this location.	ca. 1930s	Contributing	Genesee Falls
12108.000128	21-Castile Entrance	Contact Station-Castile Entrance	One-story building with wood siding and a flat gable roof.	1982	Non-contributing	Genesee Falls
12108.000129	21-Castile Entrance	Entrance Sign	One wooden painted sign with the words, "Welcome to Letchworth State Park Open 6am Closed 11 pm George E. Pataki, Governor, Bernadette Castro, Commissioner." Rear side, "Thank you for visiting."	unknown	Non-contributing	Genesee Falls
12108.000130	22-Group Camping Area	Comfort Station- Group Camp	One-story frame building with board and batten walls and an asphalt-shingled gable roof.	1970	Non-contributing due to age only	Genesee Falls
12108.000131	22-Group Camping Area	Comfort Station-Group	One-story frame building with log walls and an asphalt-shingled hip roof.	1970	Non-contributing	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
		Camp			due to age only	
12108.00 0132	22-Group Camping Area	Row of Trees	Remainder of alleé of trees probably leading to Chestnut Lawn Farm (demolished 1930s).	mid- to late-nineteenth century	Contributing	Genesee Falls
12108.00 0133	23-Lower Falls Footbridge Area	Food Concession-Octagon Stand	One-story with stone veneer on wood stud construction and an asphalt-shingled hip roof.	1942 with 1972 alterations	Contributing	Genesee Falls
12108.00 0134	23-Lower Falls Footbridge Area	Lower Falls Parking Lot	Large asphalt-paved parking area with sidewalks around the south end.	ca. 1932	Contributing	Genesee Falls
12108.00 0135	23-Lower Falls Footbridge Area	Lower Falls Footbridge	Stone arch footbridge. Constructed by the CCC. See also "Bridges" geographic area.	1935	Contributing	Genesee Falls
12108.00 0136	23-Lower Falls Footbridge Area	Lower Falls Footbridge Trail	The trail is part of the Gorge Trail (#1) and the Footbridge Trail (#6A). It is lined with stone walls along the side of the ravine. It is heavily wooded down to Table Rock, then winds down to the bridge. See also "Trails" under Park wide geographic area.	Planned by 1907	Contributing	Genesee Falls
12108.00 0137	23-Lower Falls Footbridge Area	Stone benches	Handful of small stone benches with fieldstone set in mortar supports and a wooden plank laid horizontally across the top.	ca. 1930s	Contributing	Genesee Falls
12108.00 0138	23-Lower Falls Footbridge Area	Stone fireplaces	At least sixteen fieldstone fireplaces with a lower stone wall at front and a higher barrier at rear. Some built into the side of the ravine.	ca. 1930s	Contributing	Genesee Falls
12108.00 0139	23-Lower Falls Footbridge Area	Stone picnic tables	At least forty stone slab tables with horizontally piled stone supporting pillars. Vertical stones support the stone slab seats along the sides. Placed throughout the Lower Falls Footbridge Area.	ca. 1933	Contributing	Genesee Falls
12108.00 0140	23-Lower Falls Footbridge Area	Stone Water Fountains	At least two stone water fountains near the comfort station and shelter at the Lower Falls Footbridge Area. Fieldstone set in mortar with a wider stone base.	ca. 1935 (based on Park Structures and Facilities)	Contributing	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
12108.00 0141	23-Lower Falls Footbridge Area	Upper Comfort Station at Lower Falls	Stone building with concrete slab on grade and asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell.	1937	Contributing	Genesee Falls
12108.00 0142	23-Lower Falls Footbridge Area	Upper Picnic Shelter at the Lower Falls	Stone building with asphalt-shingled hipped roof. Built by CCC. Architect: Charles I. Cromwell.	1937	Contributing	Genesee Falls
12108.00 0143	24-Cabin Area "B"	Cabin Area B Shower/Toilet/ Laundry Building	Frame building with rough-sawn wood siding and a gable on hip roof sheathed with asphalt shingles. Built by CCC. Architect: Charles I. Cromwell.	1935	Contributing	Genesee Falls
12108.00 0144	24-Cabin Area "B"	Cabin 1	Wood frame cabin with rustic clapboards at exterior walls and asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell.	1935 with 1964 addition	Contributing	Genesee Falls
12108.00 0145	24-Cabin Area "B"	Cabin 2	One-story T-shaped frame building with board and log siding, exposed rafter tails, and a metal chimney. Asphalt cross-gable roof.	1965	Non-contributing due to age only	Genesee Falls
12108.00 0146	24-Cabin Area "B"	Cabin 3	One-story T-shaped frame building with board siding, exposed rafter tails, and a metal chimney. Asphalt cross-gable roof.	1965	Non-contributing due to age only	Genesee Falls
12108.00 0147	24-Cabin Area "B"	Cabin 4	One-story T-shaped frame building with board and log siding, exposed rafter tails, and a metal chimney. Asphalt-shingled cross-gable roof.	1965	Non-contributing due to age only	Genesee Falls
12108.00 0148	24-Cabin Area "B"	Cabin 5	One-story T-shaped frame building with board and log siding, exposed rafter tails, and a metal chimney. Asphalt-shingled cross-gable roof.	1965	Non-contributing due to age only	Genesee Falls
12108.00 0149	24-Cabin Area "B"	Cabin 6	Wood frame cabin with rustic clapboards at exterior walls and asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell.	1935 with 1964 addition	Contributing	Genesee Falls
12108.00	24-Cabin Area	Cabin 7	One-story frame building with board siding,	1965 or 1955?	Non-	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
0150	"B"		exposed rafter tails, and a brick chimney. Asphalt-shingled cross-gable roof.		contributing due to age only	
12108.00 0151	24-Cabin Area "B"	Cabin 8	Wood frame cabin with rustic clapboards at exterior walls and asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell.	1935 with 1964 addition	Contributing	Genesee Falls
12108.00 0152	24-Cabin Area "B"	Cabin 9	Wood frame cabin with rustic clapboards at exterior walls and asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell.	1935 with 1964 addition	Contributing	Genesee Falls
12108.00 0153	24-Cabin Area "B"	Cabin 10	Wood frame cabin with rustic clapboards at exterior walls and asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell.	1935 with 1964 addition	Contributing	Genesee Falls
12108.00 0154	24-Cabin Area "B"	Cabin 11	Wood frame cabin with rustic clapboards at exterior walls and asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell.	1935 with 1964 addition	Contributing	Genesee Falls
12108.00 0155	24-Cabin Area "B"	Cabin 12	Wood frame cabin with rustic clapboards at exterior walls and asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell.	1935 with 1964 addition	Contributing	Genesee Falls
12108.00 0156	24-Cabin Area "B"	Cabin 13	Wood frame cabin with rustic clapboards at exterior walls and asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell.	1935 with 1964 addition	Contributing	Genesee Falls
12108.00 0157	24-Cabin Area "B"	Cabin 14	Wood frame cabin with rustic clapboards at exterior walls and asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell.	1935 with 1964 addition	Contributing	Genesee Falls
12108.00 0158	24-Cabin Area "B"	Cabin 15	Wood frame cabin with rustic clapboards at exterior walls and asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell.	1935 with 1964 addition	Contributing	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
12108.00 0159	24-Cabin Area "B"	Cabin 16	One-story frame building with board and batten siding, a screened porch with a shed roof, and an asphalt-shingled gable roof. Attached brick chimney.	1965 or 1955?	Non-contributing Due to age only	Genesee Falls
12108.00 0160	24-Cabin Area "B"	Cabin 17	One-story frame building with clapboard and log siding, a screened porch with a shed roof, and an asphalt-shingled gable roof. Attached brick chimney.	1965	Non-contributing due to age only	Genesee Falls
12108.00 0161	24-Cabin Area "B"	Cabin 18	One-story frame building with clapboard and log siding, a screened porch with a shed roof, and an asphalt-shingled gable roof. Attached brick chimney.	1965	Non-contributing due to age only	Genesee Falls
12108.00 0162	24-Cabin Area "B"	Cabin 19	One-story T-shaped frame building with clapboard and log siding and a cross-gable roof. Attached brick chimney.	1965	Non-contributing due to age only	Genesee Falls
12108.00 0163	24-Cabin Area "B"	Cabin 20	One-story rectangular frame building with clapboard siding and a cross-gable roof. Attached brick chimney.	1965	Non-contributing due to age only	Genesee Falls
12108.00 0164	24-Cabin Area "B"	Cabin 21	One-story rectangular frame building with clapboard siding and a cross-gable roof. Attached brick chimney.	1965	Non-contributing due to age only	Genesee Falls
12108.00 0165	24-Cabin Area "B"	Cabin 22	One-story rectangular frame building with T-111 siding and a cross-gable roof. Attached brick chimney.	1965	Non-contributing due to age only	Genesee Falls
12108.00 0166	25-Lower Falls Pool Area	Bath House-Lower Falls Pool	One-story frame building with a multi-level cross gable and hipped roof covered with asphalt shingles. Board and batten walls with stone facing around the front door. Stone chimney on outside wall and small high windows around the building. Sign outside says "Adventure Calls."	1949-50	Contributing	Genesee Falls
12108.00 0167	25-Lower Falls Pool Area	Comfort Station-Lower	One-story stone building with an asphalt-shingle gable roof with wood board and batten in the gable ends. Attached water	1976	Non-contributing due to age only	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
			fountain on side.			
12108.00 0168	25-Lower Falls Pool Area	Lower Falls Picnic Shelter-Lower	One-story open structure with asphalt-shingled cross gable roof. Lower walls are stone with wood supporting posts.	1957	Non-contributing due to age only	Genesee Falls
12108.00 0169	25-Lower Falls Pool Area	Lower Falls Restaurant	One-story building with rustic clapboards and stone walls and a multi-level gable roof. Square supports at front entrance with glass doors, chimney at end of building. Sign outside for "Restaurant."	1948	Contributing	Genesee Falls
12108.00 0170	25-Lower Falls Pool Area	Lower Falls Swimming Pool	Concrete pool with metal railings at end. Concrete deck and concrete steps at one end leading into the pool. A metal fence runs around the whole area.	1950	Contributing	Genesee Falls
12108.00 0171	25-Lower Falls Pool Area	Lower Falls/Lower Pool Level Parking Lot	Large asphalt parking area with multiple grassy islands with trees that divide the area from the road.	ca. 1947-48	Contributing	Genesee Falls
12108.00 0172	25-Lower Falls Pool Area	Stone water fountains	At least one stone water fountain. Fieldstone set in mortar with a wider stone base.	ca. 1940s	Contributing	Genesee Falls
12108.00 0173	26-Cabin Area "A"	Shower/Toilet/ Laundry	One-story T-shaped building with board and batten walls and an asphalt-shingled cross-gable roof. And large glass windows.	1969	Non-contributing due to age only	Genesee Falls
12108.00 0174	26-Cabin Area "A"	Cabin 1	One-story log building with an asphalt-shingled cross-gable roof and a screened porch. Metal stovepipe chimney and small windows.	1968-maybe moved from earlier Cabin Area "A"	Non-contributing due to age only	Genesee Falls
12108.00 0175	26-Cabin Area "A"	Cabin 2	One-story frame building with board and batten walls and an asphalt-shingled cross-gable roof.	1968	Non-contributing due to age only	Genesee Falls
12108.00 0176	26-Cabin Area "A"	Cabin 3	One-story log building with an asphalt-shingled cross-gable roof and a screened porch. Metal stovepipe chimney and small windows.	1968-maybe moved from earlier Cabin Area "A"	Non-contributing due to age only	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
12108.00 0177	26-Cabin Area "A"	Cabin 4	One-story L-shaped frame building with board and batten walls and an asphalt-shingled cross-gable roof.	1968	Non-contributing due to age only	Genesee Falls
12108.00 0178	26-Cabin Area "A"	Cabin 5	One-story log building with an asphalt-shingled cross-gable roof and a screened porch. Metal stovepipe chimney and small windows.	1968- maybe moved from earlier Cabin Area "A"	Non-contributing due to age only	Genesee Falls
12108.00 0179	26-Cabin Area "A"	Cabin 6	One-story frame building with board and batten siding and an asphalt-shingled gable roof. Rectangular-shaped with a screened porch.	1968	Non-contributing due to age only	Genesee Falls
12108.00 0180	26-Cabin Area "A"	Cabin 7	One-story frame building with board and batten siding and an asphalt-shingled gable roof. Rectangular-shaped with a screened porch.	1968	Non-contributing due to age only	Genesee Falls
12108.00 0181	26-Cabin Area "A"	Cabin 8	One-story frame building with board and batten siding and an asphalt-shingled gable roof. Rectangular-shaped with a screened porch.	1970	Non-contributing due to age only	Genesee Falls
12108.00 0182	26-Cabin Area "A"	Cabin 9	One-story frame building with board and batten siding and an asphalt-shingled gable roof. Rectangular-shaped with a screened porch.	1970	Non-contributing due to age only	Genesee Falls
12108.00 0183	26-Cabin Area "A"	Cabin 10	One-story frame building with board and batten siding and an asphalt-shingled gable roof. Rectangular-shaped with a screened porch.	1970	Non-contributing due to age only	Genesee Falls
12108.00 0184	26-Cabin Area "A"	Cabin 11	One-story L-shaped frame building with board and batten walls and an asphalt-shingled cross-gable roof. Handicapped ramp to front porch.	1969	Non-contributing due to age only	Genesee Falls
12108.00 0185	26-Cabin Area "A"	Cabin 12	One-story L-shaped log building with an asphalt-shingled cross-gable roof and a screened porch. Metal stovepipe chimney	1969- maybe moved from earlier Cabin Area "A"	Non-contributing due to age only	Genesee Falls

Letchworth State Park
Resource List

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
			and small windows.			
12108.00 0186	26-Cabin Area "A"	Cabin 13	One-story L-shaped frame building with board and batten walls and an asphalt-shingled cross-gable roof.	1969	Non-contributing due to age only	Genesee Falls
12108.00 0187	26-Cabin Area "A"	Cabin 14	One-story L-shaped log building with an asphalt-shingled cross-gable roof and a screened porch. Metal stovepipe chimney and small windows.	1969- maybe moved from earlier Cabin Area "A"	Non-contributing due to age only	Genesee Falls
12108.00 188	26-Cabin Area "A"	Cabin 15	One-story L-shaped frame building with board and batten walls and an asphalt-shingled cross-gable roof.	1969	Non-contributing due to age only	Genesee Falls
12108.00 0189	26-Cabin Area "A"	Cabin 16	One-story L-shaped frame building with board and batten walls and an asphalt-shingled cross-gable roof.	1969	Non-contributing due to age only	Genesee Falls
12108.00 0190	26-Cabin Area "A"	Cabin 17	One-story L-shaped frame building with board and batten walls and an asphalt-shingled cross-gable roof.	1969	Non-contributing due to age only	Genesee Falls
12108.00 0191	26-Cabin Area "A"	Cabin 18	One-story frame building with board and batten siding and an asphalt-shingled gable roof. Rectangular-shaped with a screened porch.	1969	Non-contributing due to age only	Genesee Falls
12108.00 0192	26-Cabin Area "A"	Cabin 19	One-story frame building with board and batten siding and an asphalt-shingled gable roof. Rectangular-shaped with a screened porch.	1969	Non-contributing due to age only	Genesee Falls
12108.00 0193	26-Cabin Area "A"	Cabin 20	One-story frame building with board and batten siding and an asphalt-shingled gable roof. Rectangular-shaped with a screened porch.	1969	Non-contributing due to age only	Genesee Falls
12108.00 0194	26-Cabin Area "A"	Cabin 21	One-story frame building with board and batten siding and an asphalt-shingled gable roof. Rectangular-shaped with a screened porch.	1969	Non-contributing due to age only	Genesee Falls
12108.00	26-Cabin Area	Cabin 22	One-story frame building with board and	1969	Non-	Genesee Falls

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
0195	"A"		batten siding and an asphalt-shingled gable roof. Rectangular-shaped with a screened porch.		contributing due to age only	
12104.00 0052	27-Wolf Creek Area	Stone fireplaces	At least one fieldstone fireplace with a lower stone wall at front and a higher barrier at rear.	ca. 1930s	Contributing	Castile
12104.00 0053	27-Wolf Creek Area	Stone Picnic Tables	At least fourteen stone slab tables with horizontally piled stone supporting pillars. Vertical stones support the stone slab seats along the sides. Placed throughout the area.	ca. 1930s	Contributing	Castile
12104.00 0054	27-Wolf Creek Area	Stone Water Fountains	At least one stone water fountain. Fieldstone set in mortar with a wider stone base.	ca. 1935 (based on Park Structures and Facilities)	Contributing	Castile
12104.00 0055	27-Wolf Creek Area	Wolf Creek Bridge	Single-span concrete arch bridge with masonry stone veneer, topped with asphalt pavement roadway. Railings are stone-faced concrete walls as are the approach wing-walls. The road is tightly curved over the bridge and is heavily super-elevated. The arch is founded on rock in the creek bed, and is located at the downstream end of a bend in the creek. See also "Bridges" geographic area.	1927	Contributing	Castile
12104.00 0056	27-Wolf Creek Area	Wolf Creek Comfort Station	Stone building with concrete slab on grade and asphalt-shingled gable roof. Stone walls at front and stone steps at sides and at center of the building leading to the picnic grounds. Built by the CCC (?) Architect: Charles I. Cromwell.	ca. 1940	Contributing	Castile
12104.00 0057	27-Wolf Creek Area	Wolf Creek Footbridge	Small metal footbridge over creek below the road bridge. Small plaque on bridge "Steadfast bridges, Fort Payne, Ala." See also "Bridges" geographic area.	1989	Non-contributing	Castile
12104.00	27-Wolf Creek	Wolf Creek	Asphalt-paved parking area with tree wells	ca. 1930	Contributing	Castile

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
0058	Area	Parking Area	and stone curbs.			
12104.00 0059	28-Tea Table Area	Eddy's Comfort Station	One-story stone building with an asphalt-shingled gable roof and recessed windows. Built with Attica Prison Labor.	1940	Contributing	Castile
12104.00 0060	28-Tea Table Area	Eddy's Picnic Area Parking Lot	Asphalt parking lot divided into three sections by grassy dividers.	ca. 1930	Contributing	Castile
12104.00 0061	28-Tea Table Area	Eddy's Picnic Shelter	Stone Shelter with rustic clapboards at gable ends. Asphalt-shingled gable roof. Built by CCC Architect: Charles I. Cromwell	ca. 1940	Contributing	Castile
12104.00 0062	28-Tea Table Area	Stone picnic Tables at Eddy's	At least five stone slab tables with horizontally piled stone supporting pillars. Vertical stones support the stone slab seats along the sides. Placed throughout the area.	ca. 1930	Contributing	Castile
12104.00 0063	28-Tea Table Area	Stone Picnic Tables at Tea Table	At least twelve stone slab tables with horizontally piled stone supporting pillars. Vertical stones support the stone slab seats along the sides. Placed throughout the picnic area.	1931	Contributing	Castile
12104.00 0064	28-Tea Table Area	Stone Water Fountain at Eddy's	At least one stone water fountain. Fieldstone set in mortar with a wider stone base.	ca. 1935 (based on Park Structures and Facilities)	Contributing	Castile
12104.00 0065	28-Tea Table Area	Stone Water Fountains at Tea Table	At least one stone water fountain. Fieldstone set in mortar with a wider stone base.	1931	Contributing	Castile
12104.00 0066	28-Tea Table Area	Tea Table Picnic Shelter	Log shelter with concrete slab on grade and asphalt-shingled gable roof. Pictured in *Park Structures and Facilities* (1935) Built by CCC. Architect: Charles I. Cromwell.	1931	Contributing	Castile
12104.00 0067	29- St Helena A Area	Parking Lot at St. Helena A Area	Small parking are which is partially asphalt-paved, partially gravel. The road forms a loop with the parking area at the end.	unknown	Contributing	Castile
12104.00	29-St. Helena A	Comfort	One-story brick building with an asphalt-	1966	Non-	Castile

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
0068	Area	Station-Upper	shingled gable roof and tongue and groove boards at center and around doors.		contributing	
12104.00 0069	29-St. Helena A Area	St. Helena Picnic Shelter	Log shelter with flagstones set in concrete on grade, an asphalt-shingled cross-gable roof., and a stone fireplace. Built by CCC. Architect: Charles I. Cromwell.	1934-1935	Contributing	Castile
12104.00 0070	29-St. Helena A Area	Stone Picnic Tables	At least eight stone slab tables with horizontally piled stone supporting pillars. Vertical stones support the stone slab seats along the sides. Placed throughout the picnic area.	ca. 1930s	Contributing	Castile
12104.00 0071	29-St. Helena A Area	Stone Water Fountains at St. Helena	At least one stone water fountain. Fieldstone set in mortar with a wider stone base.	ca.1930s	Contributing	Castile
12104.00 0072	30-St. Helena B Area	Comfort Station-Middle	One-story brick building with an asphalt-shingled gable roof and tongue and groove boards at center and around doors.	1967	Non-contributing	Castile
12104.00 0073	30-St. Helena B Area	Parking Lot	Medium-sized asphalt-paved parking lot with three grassy islands with trees.	ca. 1967	Non-contributing	Castile
12104.00 0074	31-St. Helena C Area	Comfort Station- Lower	One-story brick building with an asphalt-shingled gable roof and tongue and groove boards at center and around doors.	1967	Non-contributing	Castile
12104.00 0075	31-St. Helena C Area	Parking Lot	Large asphalt-paved parking lot with a sidewalk around the edge.	ca. 1967	Non-contributing	Castile
05106.00 0049	32- Littledyke House Area	Storage Building	One-story building with board and batten walls and an asphalt-shingled gable roof.	1970	Non-contributing	Leicester
05106.00 0050	32-Littledyke House Area	Littledyke House	One-and-one-half-story Greek Revival farmhouse of frame construction. One-story flanking wing. Asphalt-shingled gable roof. Attached garage. Wide frieze cornice returns at gable ends, porch at wings with square columns. Remodelled in June 1937 by CCC under the direction of park architect Charles I. Cromwell.	ca. 1840-1850	Contributing	Leicester

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
05106.000048	32-Littledyke House Area	Log Storage Shed	One-story log building with gable roof. Built by the CCC.	ca. 1935	Contributing	Leicester
05106.000051	32-Littledyke House Area	Misc. Equipment Building	One-story garage building with board and batten siding and metal gable roof. Two garage doors and two sliding bay doors on front side.	Date unknown; moved in 1978	Non-contributing	Leicester
05106.000052	33-Perry Entrance Area	Entrance Sign	One wooden painted sign with the words, "Welcome to Letchworth State Park Open 6am Closed 11 pm George E. Pataki, Governor, Bernadette Castro, Commissioner." Rear side, "Thank you for visiting."	unknown	Non-contributing	Leicester
05106.000053	33-Perry Entrance Area	Perry Contact Station	One-story stone building with asphalt-shingled gable roof and multiple windows on all sides.	1959	Non-contributing due to age only	Leicester
05106.000054	34-Highbanks Camping Area	Comfort Station-Camping Center	One-story brick building with small high windows and asphalt-shingled roof. Board and batten walls at the center of the structure.	1966	Non-contributing	Leicester
05106.000055	34-Highbanks Camping Area	Contact Station-Camping	One-story concrete block building with asphalt-shingled gable roof and numerous windows on all sides.	1965	Non-contributing	Leicester
05106.000056	34-Highbanks Camping Area	Parking Lot at Camping Center	Large asphalt-paved parking area with a sidewalk around the north side.	ca. 1966	Non-contributing	Leicester
05106.000057	34-Highbanks Camping Area	Recreation Building-Camping Center	One-story building with board and batten walls and metal gable roof. Windows are located on three sides of the building, and there are multiple sets of doors on all sides of the structure.	1966	Non-contributing	Leicester
05106.000058	34-Highbanks Camping Area	Shower/Toilet Building at Camping Area "A"	One-story brick building with asphalt-shingled gable roof.	1966	Non-contributing	Leicester

Letchworth State Park
Resource List

OMB No. 10024-0018

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
05106.000059	34-Highbanks Camping Area	Shower/Toilet Building at Camping Area "B"	One-story cinderblock building with asphalt-shingled gable roof.	1966	Non-contributing	Leicester
05106.000060	34-Highbanks Camping Area	Shower/Toilet Building at Camping Area "C"	One-story brick building with asphalt-shingled gable roof.	1966	Non-contributing	Leicester
05106.000061	34-Highbanks Camping Area	Shower/Toilet Building at Camping Area "D"	One-story brick building with asphalt-shingled gable roof.	1966	Non-contributing	Leicester
05106.000062	34-Highbanks Camping Area	Shower/Toilet Building at Camping Area "E"	One-story brick building with asphalt-shingled gable roof.	1966	Non-contributing	Leicester
05106.000063	34-Highbanks Camping Area	Shower/Toilet Building at Camping Area "F"	One-story brick building with asphalt-shingled gable roof.	1966	Non-contributing	Leicester
05106.000064	34-Highbanks Camping Area	Shower/Toilet Building at Camping Area "G"	One-story cinderblock building with asphalt-shingled gable roof.	1973	Non-contributing	Leicester
05106.000065	34-Highbanks Camping Area	Shower/Toilet Building at Camping Area "H"	One-story cinderblock building with asphalt-shingled gable roof.	1966	Non-contributing	Leicester
05106.000066	34-Highbanks Camping Area	Store and Laundry-Camping Center	One-story frame building with board and batten walls and asphalt-shingled gable roof. Large windows on front and rear and a shed addition with a shed roof on front side.	1966	Non-contributing	Leicester
05106.000067	35- Kisil Point Area	Stone Picnic Tables	At least five stone slab tables with horizontally piled stone supporting pillars.	c.a. 1930s	Contributing	Leicester

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
			No benches attached to the tables. Placed below the shelter around the area.			
05106.00 0068	35-Kisil Point Area	Kisil Point Picnic Shelter	One-story log shelter with concrete slab on grade and wood-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell.	1934-1935	Contributing	Leicester
05106.00 0069	36-Cabin Area "C"	Shower/Toilet/ Laundry Building	One-story T-shaped log-sided building with asphalt-shingled gable roof and small windows high on the walls.	1979, new siding ca. 1990	Non-contributing due to age only	Leicester
05106.00 0070	36-Cabin Area "C"	Cabin 1	Log building with asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell	ca. 1935	Contributing	Leicester
05106.00 0071	36-Cabin Area "C"	Cabin 2	One-story log building with asphalt-shingled gable roof. A permanent handicapped ramp leads to the front porch.	1995	Non-contributing due to age only	Leicester
05106.00 0072	36-Cabin Area "C"	Cabin 3	One-story building with board and batten siding and asphalt-shingled gable roof.	1979	Non-contributing due to age only	Leicester
05106.00 0073	36-Cabin Area "C"	Cabin 4	One-story log building with asphalt-shingled gable roof. A permanent handicapped ramp leads to the front porch.	1993	Non-contributing due to age only	Leicester
05106.00 0074	36-Cabin Area "C"	Cabin 5	Log building with asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell	ca. 1935	Contributing	Leicester
05106.00 0075	36-Cabin Area "C"	Cabin 6	One-story log building with asphalt-shingled gable roof. Sliding two-pane windows on all sides.	1993	Non-contributing due to age only	Leicester
05106.00 0076	36-Cabin Area "C"	Cabin 7	Log building with asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell	ca. 1935	Contributing	Leicester
05106.00 0077	36-Cabin Area "C"	Cabin 8	One-story log building with asphalt-shingled gable roof. Sliding two-pane windows on all sides.	1995	Non-contributing due to age only	Leicester
05106.00 0078	36-Cabin Area "C"	Cabin 9	One-story log building with asphalt-shingled gable roof. Sliding two-paned	1995	Non-contributing	Leicester

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
			windows on all sides.		due to age only	
05106.00 0079	36-Cabin Area "C"	Cabin 10	One-story building with board and batten siding and asphalt-shingled gable roof. A permanent handicapped ramp leads to the front porch.	1979	Non-contributing due to age only	Leicester
05106.00 0080	36-Cabin Area "C"	Cabin 11	One-story building with board and batten siding and asphalt-shingled gable roof. A permanent handicapped ramp leads to the front porch.	1979	Non-contributing due to age only	Leicester
05106.00 0081	36-Cabin Area "C"	Cabin 12	One-story log building with asphalt-shingled gable roof.	1994	Non-contributing due to age only	Leicester
05106.00 0082	36-Cabin Area "C"	Cabin 13	One-story log building with asphalt-shingled gable roof.	1994	Non-contributing due to age only	Leicester
05106.00 0083	36-Cabin Area "C"	Cabin 14	One-story log building with asphalt-shingled gable roof. Sliding two-pane windows on all sides.	1994	Non-contributing due to age only	Leicester
05106.00 0084	36-Cabin Area "C"	Cabin 15	One-story log building with asphalt-shingled gable roof. Sliding two-pane windows on all sides.	1993	Non-contributing due to age only	Leicester
05106.00 0085	36-Cabin Area "C"	Cabin 16	Log building with asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell	ca. 1935	Contributing	Leicester
05106.00 0086	36-Cabin Area "C"	Cabin 17	Log building with asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell	ca. 1935	Contributing	Leicester
05106.00 0087	36-Cabin Area "C"	Cabin 18	Log building with asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell	ca. 1935	Contributing	Leicester
05106.00 0088	37-Camping Registration Area	Caretaker"s House	Two-story log residence with asphalt-shingled gable roof. Built by Gibsonville CCC. Architect: Charles I. Cromwell.	ca. 1936	Contributing	Leicester
05106.00	37-Camping	Parking Area	Four asphalt-paved and gravel parking	ca. 1936	Contributing	Leicester

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
0089	Registration Area	for Registration	spaces lined up just off driveway leading to the Caretaker's House.			
05106.00 0090	37-Camping Registration Area	Pump House	Log building with asphalt- shingled gable roof	1936	Contributing	Leicester
05106.00 0091	38- Highbanks Recreation Area	Parking Lot at Highbanks	Very large asphalt-paved parking area with no grassy dividers. Concrete sidewalks around edges and to each building.	ca. 1960s	Non-contributing due to age only	Leicester
05106.00 0092	38-Highbanks Recreation Area	Bathhouse at Highbanks Pool	One-story frame building with combination hipped and soaring gable roof. Wood clapboards and glass-front and rear. Stone piers developed into planters and brick serpentine walls extend from either side. Aluminum frame doors and windows. Stone chimneys, flagstone paving, and exposed structural members.	1963	Non-contributing due to age only	Leicester
05106.00 0093	38-Highbanks Recreation Area	Chlorine Storage at Harvey Pool	One-story brick building with asphalt-shingled gable roof and wood siding in the gable ends.	Possibly early 1960s	Non-contributing due to age only	Leicester
05106.00 0094	38-Highbanks Recreation Area	Comfort Station-Northeast	One-story brick building with asphalt-shingled gable roof. Wood siding in the gable ends, small windows placed high on the walls.	1963	Non-contributing due to age only	Leicester
05106.00 0095	38-Highbanks Recreation Area	Comfort Station-Middle	One-story brick building with asphalt-shingled gable roof with a broad overhang and exposed beams.	1962	Non-contributing due to age only	Leicester
05106.00 0096	38-Highbanks Recreation Area	Comfort Station-Southwest	One-story brick building with an asphalt-shingled gable roof with a broad overhang and exposed beams.	1961	Non-contributing due to age only	Leicester
05106.00 0097	38-Highbanks Recreation Area	Food Concession-Pool Snack Bar	One-story metal-framed building with an asphalt-shingled gable roof. Glass on all sides, colored tile on the lower walls. The building backs up on the pool area.	1963	Non-contributing due to age only	Leicester
05106.00 0098	38-Highbanks Recreation Area	Grandstand/ Filter Building	Multi-rows of seats above a one-story brick building. Fiberglass awning above the seats,	1963	Non-contributing	Leicester

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
			cement steps on either side of the structure, and cement piers extending above the seating area as flagpoles. Faces the pool area.		due to age only	
05106.00 0099	38-Highbanks Recreation Area	Park Police Headquarters	One-story stone building with an inverted soaring asphalt-shingled gable roof. Wood siding around the doors and under the roofline. Stone chimney on outside end.	1962	Non-contributing due to age only	Leicester
05106.00 0100	38-Highbanks Recreation Area	Picnic Shelter at Highbanks	One-story open wood frame building with an asphalt-shingled gable roof. Wood supports and rectangular brick piers. Exposed rafter beams and elliptical wood arches below the gable ends. Rear enclosed with chimneys.	1961	Non-contributing due to age only	Leicester
05106.00 0101	38-Highbanks Recreation Area	Picnic Shelter at Highbanks (North)	One-story brick building with asphalt-shingled cross-gabled roof. Large glass doors and windows with wood siding below the window frames. T-shaped stone piers and exposed rafter beams. Elliptical wood arches below the gable ends.	1961	Non-contributing due to age only	Leicester
05106.00 0102	38-Highbanks Recreation Area	Picnic Shelter at Highbanks (South)	One-story brick building with asphalt-shingled cross-gabled roof. Large glass doors and windows with wood siding below the window frames. T-shaped stone piers and exposed rafter beams. Elliptical wood arches below the gable ends.	1961	Non-contributing due to age only	Leicester
05106.00 0103	39-Conlon Point Area	Picnic Shelter at Conlon Point	One-story open structure with gable roof, exposed rafters, and wood supports.	1963	Non-contributing due to age only	Leicester
05106.00 0104	40-Whitmore House Area	Garage	One-story frame building with clapboard walls and asphalt-shingled gable roof and two garage doors.	ca. 1915-1925	Contributing	Leicester
05106.00 0105	40-Whitmore House Area	William C. Whitmore	Bungalow style frame house with cross-gable roof and cedar shakes at exterior	ca. 1915-1925	Contributing	Leicester

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
		House	walls. Currently used as the Park Manager's House (or north park police residence?)			
05106.00 0106	41-Dam Overlook Area	Parking Lot at Dam Overlook	Large asphalt-paved parking lot with a grassy island dividing it from the main park road.	c.a. 1948	Contributing	Leicester
05106.00 0107	41-Dam Overlook Area	Shelter-Dam Overlook	One-story open structure with asphalt-shingled hip roof. Lower walls made of boards. Built by the Corps of Engineers.	c.a. 1948	Contributing	Leicester
05106.00 0108	42- Mt. Morris Dam Area	Parking Lot at Dam	Large asphalt-paved parking lot with concrete sidewalks around the edges.	c.a. 1948	Contributing	Leicester
05106.00 0109	42-Mt. Morris Dam Area	Comfort Station	One-story stone building with asphalt-shingled gable roof.	1956	Non-contributing due to age only	Leicester
05106.00 0110	42-Mt. Morris Dam Area	Food Concession	One-story building with wood siding and a cross-gable asphalt-shingle roof. Glass-fronted around the front entrance. Used by the Corps of Engineers as a concrete testing facility 1948-1952.	c.a. 1948	Contributing	Leicester
05106.00 0111	42-Mt. Morris Dam Area	Signboard	Information board with stone foundations and a gable roof. Provides information about the Mt. Morris Dam and a map of the area.	c.a. 1972	Non-contributing due to age only	Leicester
05106.00 0112	43-Quonset Area	Former Wood Bin now used for Storage	One-story frame building with board siding and a shed roof.	c.a. 1935; moved 1974	Contributing	Leicester
05106.00 0113	43-Quonset Area	Maintenance Garage-Quonset	Semi-circular corrugated metal building with garage doors at front and rear. Six-pane windows at sides, lean-to on east side of building.	1948	Contributing	Leicester
05106.00 0114	43-Quonset Area	Parking Lot at the Quonset Area	A small gravel parking area just outside the fenced in area. A few trees are located on the east side of the lot, and there is no curbing.	Unknown- probably 1948	Contributing	Leicester
05106.00	43-Quonset Area	Storage	One-story log building with an asphalt-	1935	Contributing	Leicester

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
0115		building at Quonset Area	shingled gable roof. Was originally a cabin in Cabin Area C and was later moved to quonset area for storage.			
05106.00 0116	44-Mt. Morris Entrance	Contact Station	One-story stone building with an asphalt-shingled gable roof and multiple windows on all sides.	1959	Non-contributing due to age only	Leicester
05106.00 0117	44-Mt. Morris Entrance	Entrance Sign	One wooden painted sign with the words, "Welcome to Letchworth State Park Open 6am Closed 11 pm George E. Pataki, Governor, Bernadette Castro, Commissioner." Rear side, "Thank you for visiting."	Unknown	Non-contributing	Leicester
05106.00 0118	45-North Residence Area	Former Greenhouse now used for storage	Two-story frame building with stucco walls and an asphalt-shingled gable roof.	ca. 1910 (?), probably earlier	Contributing	Leicester
05106.00 0119	45-North Residence Area	Garage	One-story frame building with asbestos siding and an asphalt-shingled gable roof.	1950(?) possible pre-1948.	Contributing	Leicester
05106.00 0120	45-North Residence Area	Garage	One-and-a-half-story concrete block garage with a gable roof with a dormer. Charles Sider former owner.	ca. 1940 (?)	Contributing	Leicester
05106.00 0121	45-North Residence Area	Park Residence	One-and-a-half story frame residence with cedar shingles on exterior walls and asphalt-shingled gable roof and brick chimney.	ca. 1940	Contributing	Leicester
05106.00 0122	45-North Residence Area	Park Residence	One-story frame residence with novelty siding walls and asphalt-shingled cross gable roof. Charles Sider former owner.	ca. 1940 (?)	Contributing	Leicester
05106.00 0123	45-North Residence Area	Shed	One-story frame shed with asbestos-shingle walls and an asphalt-shingled gable roof. Was moved from near Silver Lake.	ca. 1940	Contributing	Leicester
05113.00 0030	46- Cabin Area "D"	Stone water fountain	At least one stone water fountain located in front of Cabin 6. Fieldstone set in mortar with a wider stone base.	1934	Contributing	Portage
05113.00	46-Cabin Area	Cabin Area D	One-story log building with concrete slab	1934	Contributing	Portage

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
0031	"D"	Shower Building	on grade and asphalt-shingled gable roof. Built by CCC. Architect Charles I. Cromwell.			
05113.00 0032	46-Cabin Area "D"	Pump House		1934	Contributing	Portage
05113.00 0033	46-Cabin Area "D"	Stone wall with spigot	Small stone wall with water spigot for washing dishes, located in front of Cabin 9.	1934	Contributing	Portage
05113.00 0034	46-Cabin Area "D"	Cabin 1	One-story log cabin with asphalt-shingled gable roof, stone chimney, and porch. Built by CCC. Architect: Charles I. Cromwell	1934	Contributing	Portage
05113.00 0035	46-Cabin Area "D"	Cabin 2	One-story log cabin with asphalt-shingled gable roof, stone chimney, and porch. Built by CCC. Architect: Charles I. Cromwell	1934	Contributing	Portage
05113.00 0036	46-Cabin Area "D"	Cabin 3	One-story log cabin with asphalt-shingled shed roof. Built by CCC. Architect: Charles I. Cromwell	1934	Contributing	Portage
05113.00 0037	46-Cabin Area "D"	Cabin 4	One-story log cabin with asphalt-shingled gable roof and a cinder block chimney. Built by CCC. Architect: Charles I. Cromwell	1934	Contributing	Portage
05113.00 0038	46-Cabin Area "D"	Cabin 5	One-story log cabin with asphalt-shingled gable roof and a cinder block chimney. Built by CCC. Architect: Charles I. Cromwell	1934	Contributing	Portage
05113.00 0039	46-Cabin Area "D"	Cabin 6	One-story log cabin with asphalt-shingled gable roof and a cinder block chimney. Built by CCC. Architect: Charles I. Cromwell	1934	Contributing	Portage
05113.00 0040	46-Cabin Area "D"	Cabin 7	One-story log cabin with asphalt-shingled gable roof, a cinder block chimney, and porch. Built by CCC. Architect: Charles I. Cromwell	1934	Contributing	Portage
05113.00 0041	46-Cabin Area "D"	Cabin 8	One-story log cabin with asphalt-shingled shed roof. Built by CCC. Architect: Charles	1934	Contributing	Portage

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
			I. Cromwell			
05113.00 0042	46-Cabin Area "D"	Cabin 9	One-story log cabin with asphalt-shingled gable roof and a cinder block chimney. Built by CCC. Architect: Charles I. Cromwell	1934	Contributing	Portage
05113.00 0043	46-Cabin Area "D"	Cabin 10	One-story log cabin with asphalt-shingled gable roof and porch. Built by CCC. Architect: Charles I. Cromwell	1934	Contributing	Portage
05113.00 0044	47-Parade Grounds Area	Historical Marker and Boulder at the Parade Grounds	Large stone with plaque mounted on it. "First New York Dragoons 130th New York Volunteers Infantry Organized on this Filed September 2, 1862 Colonel Alfred Gibbs, Lieutenant Colonel T.J. Thorpe, Major Rufus Scott Captured prisoners 1,533 Pieces of Artillery 19 caisson 21 Artillery Horses 240 Army Wagons and Ambulances 40 Animals of Draught 160 Battle Flags 4 With Sheridan in the Shenandoah Valley Mustered out June 10, 1865 at Clouds Mills, VA" On the other side of the boulder another plaque has been mounted on it. "136th Infantry 2d Brig. 2Div. 11th Corps Mustered on this Field September 26, 1862 Col. James Wood Jr. Lieut. Col. Lester B. Faulkner Major. David C. Hartshorn Mustered out at Washington D.C. June 13, 1865	Dedicated August 29, 1935	Contributing	Portage
05113.00 0045	47-Parade Grounds Area	Parade Grounds Comfort Station	One-story stone building with an asphalt-shingled gable roof. Doors at either end, small three over three windows near roofline.	1949	Contributing	Portage
05113.00 0046	47-Parade Grounds Area	Parade Grounds	Site of Civil War training camp at Portage known as Camp Portage, Camp Williams, Barracks Grounds, or Parade Grounds. The	1862	Contributing	Portage

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
			camp was in operation in 1862 and later its buildings were dismantled			
05113.00 0047	47-Parade Grounds Area	Parade Grounds Parking Lot	Gravel-asphalt paved parking lot in 4 sections divided by grassy hillocks with scattered trees.	ca. 1947-1948	Contributing	Portage
05113.00 0048	47-Parade Grounds Area	Parade Grounds Picnic Shelter	One-story log shelter with concrete slab on grade and asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell.	1934	Contributing	Portage
05113.00 0049	47-Parade Grounds Area	Stone Picnic Tables	At least four stone slab tables with horizontally piled stone supporting pillars. Vertical stones support the stone slab seats along the sides. Located behind the Parade Grounds shelter.	ca. 1930	Contributing	Portage
05113.00 0050	47-Parade Grounds Area	Stone Water Fountains	At least one stone water fountain. Fieldstone set in mortar with a wider stone base.	ca. 1930	Contributing	Portage
05113.00 0051	48-Cabin Area "E"	Comfort Station-Middle	Small one-story log faced building with an asphalt-shingled gable rood and doors at either end.	ca. 1954	Non-contributing due to age only	Portage
05113.00 0052	48-Cabin Area "E"	Comfort Station-North	Small one-story log faced building with an asphalt-shingled gable rood and doors at either end.	ca. 1954	Non-contributing due to age only	Portage
05113.00 0053	48-Cabin Area "E"	Comfort Station-South	Small one-story log faced building with an asphalt-shingled gable rood and doors at either end.	ca. 1954	Non-contributing due to age only	Portage
05113.00 0054	48-Cabin Area "E"	Pump House	Small one-story building with board and batten walls and an asphalt-shingled gable roof.	1975	Non-contributing	Portage
05113.00 0055	48-Cabin Area "E"	Cabin 1	Log-sided building with asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell	1933-1934	Contributing	Portage
05113.00 0056	48-Cabin Area "E"	Cabin 2	Log-sided building with asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell	1933-1934	Contributing	Portage

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
05113.000057	48-Cabin Area "E"	Cabin 3	Log-sided building with asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell	1933-1934	Contributing	Portage
05113.000058	48-Cabin Area "E"	Cabin 4	Log-sided building with asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell	1933-1934	Contributing	Portage
05113.000059	48-Cabin Area "E"	Cabin 5	Log-sided building with asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell	1933-1934	Contributing	Portage
05113.000060	48-Cabin Area "E"	Cabin 6	Log-sided building with asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell	1933-1934	Contributing	Portage
05113.000061	48-Cabin Area "E"	Cabin 7	Log-sided building with asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell	1933-1934	Contributing	Portage
05113.000062	48-Cabin Area "E"	Cabin 8	Log-sided building with asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell	1933-1934	Contributing	Portage
05113.000063	48-Cabin Area "E"	Cabin 9	Log-sided building with asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell	1933-1934	Contributing	Portage
05113.000064	48-Cabin Area "E"	Cabin 10	Log-sided building with asphalt-shingled gable roof. Built by CCC. Architect: Charles I. Cromwell	1933-1934	Contributing	Portage
05109.000029	49- Federal Dam Reservation Area	Garage	One-story corrugated metal building with metal shed roof.	ca. 1980	Non-contributing	Mt. Morris
05109.000030	49- Federal Dam Reservation Area	Garage	One-story corrugated metal building with metal shed roof	ca. 1980	Non-contributing	Mt. Morris
05109.000031	49- Federal Dam Reservation Area	Parking Lot	Medium-sized asphalt-paved parking lot with grassy medians	ca. 1950-1998	Non-contributing	Mt. Morris
05109.000032	49- Federal Dam Reservation Area	Propeller	Four-blade metal propeller set blade-up in the ground.	Unknown	Non-contributing	Mt. Morris
05109.000033	49- Federal Dam Reservation Area	Radio Tower	Tall open weave metal tower painted red and white	Post-1952	Non-contributing	Mt. Morris

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
05109.000034	49- Federal Dam Reservation Area	Residence	One-and-one-half-story house with an asphalt-shingled gable roof and vinyl siding and an attached garage	ca. 1948	Contributing	Mt. Morris
05109.000035	49- Federal Dam Reservation Area	Residence	Two-story house with attached garage and an asphalt-shingled gable roof and vinyl siding.	ca. 1948 with later changes	Non-contributing	Mt. Morris
05109.000036	49- Federal Dam Reservation Area	Turret	Round stone building with a pointed slate tower roof	ca. 1948	Contributing	Mt. Morris
05109.000037	49- Federal Dam Reservation Area	Visitor Center	One-story frame building with an asphalt-shingle cross-gable roof and stone walls. Large glass windows at front, large corrugated metal addition at rear with a shed roof.	1998	Non-contributing	Mt. Morris
12108.000196	Arboretum Area	Arboretum	Approximately eighty-four tree species in forty-nine blocks. Located in area between the Middle Falls and the present Administration building and below the Portage High Bridge. Once included a nursery.	First tree planted in 1912	Contributing	Genesee Falls
A12108.000026	Archaeological	Chestnut Lawn Farm Site	Site of 19th century estate and dairy farm. Also the site of Lower Falls CCC Camp (Camp SP 49). The buildings in this camp have been removed. Camp was located in the general vicinity of the Lower Falls Swimming Pool.	mid-19th century - 1913; 1933-1941	Contributing	Genesee Falls
A12108.000031	Archaeological	Council House Grounds	Site of former structure including the Swiss Cottage, gazebos, fences, gates, and a museum. Built by William Letchworth 1880s-1910. Removed by the American Scenic and Historic Preservation Society 1912-1920.	Late 19th century, early 20th century.	Contributing	Genesee Falls
A05109.00009	Archaeological	Hendershot Road Site	Early Woodland Native American site on east side of river opposite Highbanks Recreation Area. Site associated with park	Early Woodland	Contributing	Mt. Morris

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
			but just outside modern park boundaries. Also known as Follett No. 316.			
A05106. 000046	Archaeological	Littledyke Farm site	Native American site near Littledyke Farm on west side of the park. Also known as Parker Livingston County site No. 61.	Pre-Iroquoian	Contributing	Leicester
A05113. 000016 + A05113. 000017	Archaeological	Site of Deo-west-ta	Seneca village on the neck of land on the east side of the river between Portageville and the Lower Falls. Also known as Follett sites 346A and B.	Late Woodland, Historic Iroquois; unidentified Prehistoric	Contributing	Portage
A05106. 000012 + A05106. 000009	Archaeological	Site of De-yu-it-ga-oh or Squawkie Hill	Seneca village on the bluffs near the present north end of the park. Site of Hopewelliam mounds, which are rare in New York state. Aso known as Parker Livingston County site No. 54 and U.B. 1016 Nda 1-1 RMSC Files.	Middle Woodland, Hopewellian, Iroquois	Contributing	Leicester
A12104. 000048	Archaeological	Site of Ga-da-ho or Gardleau	Seneca village located in the flats of the valley north of the Lower Falls. Mary Jemison came to the abandoned village of Gardeau after Sullivan's Raid at Little Beard's Town in 1779. Also known as U.B. 511.		Contributing	Castile
A12108. 000026	Archaeological	Site of Genesee Falls School	School built by William Letchworth for students of Genesee Falls in 1874, razed in 1947. Also known as H-RMSC-Genesee Falls School.	Late-nineteenth, early-twentieth century	Contributing	Genesee Falls
A05106. 000013	Archaeological	Site of Gibsonville	Late-eighteenth, early nineteenth century milling community. Last settler left in 1930. A chimney of indeterminate age is the only major above ground remnant. Also the site of the Gibsonville CCC Camp (Camp SP 40). The buildings at this camp have been removed. A stone chimney of indeterminate age is still standing.	ca. 1792-1930; 1933-1937	Contributing	Leicester
A05113.	Archaeological	Site of Portage-	Mid-nineteenth century site of village of	Mid-nineteenth	Contributing	Portage

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
000026		Genesee Settlement	Portage. Also known as H-SUBi-1603.	century		
A12108.000024	Archaeological	Site of sawmill on the east bank at the Upper Falls	Archaeological remains of grist mill and mill race the Portage train station in the nineteenth century. Site also known as U.B. 22630.	Early to mid 19th century	Contributing	Portage
A12104.000005	Archaeological	Site of St. Helena	Site of Native American village. Also site of vanished nineteenth century milling community. Was nearly deserted by the early 1920s. Also site of St. Helena CCC Camp (Camp SP 76). The buildings at this camp have been removed. The camp was located near the former hamlet of St. Helena. Native American site also known as U.B. 1018 Nda 2-1 RMSC File.	Late Woodland, Early Owasco; ca. 1797-1954	Contributing	Castile
A05109.000012	Archaeological	Tallman Road site	Native American camp on the east side of the river opposite Highbanks Recreation Area. Site also known as Follett 374.	Unidentified Prehistoric	Contributing	Mt. Morris
A05106.000047	Archaeological	White Woman's Spring Site	Near Squawkie Hill; site of spring supposedly associated with Mary Jemison. Site also known as H-Parker Livingston County No. 55.	Late-eighteenth, early-nineteenth century- Iroquois	Contributing	Leicester
A12108.000033	Archaeological-not field identified	Site of Big Bend CCC Camp (Camp SP23)	The buildings at this camp have been removed. Camp was located near the current Cabin Area "E." Stone chimney is only above ground remainder of the camp.	1933-1941	Contributing	Genesee Falls
A05113.000028	Archaeological-not field identified	Site of Hornby Lodge	Potential archaeological site of Hornby Lodge, a rustic-style home that was built around a large oak tree.	ca. 1840; razed in 1848(?)	Contributing	Portage
A05113.000029	Archaeological-not field identified	Site of the Cascade Hotel	Hotel built in the mid-nineteenth century with the coming of the railroad.	1852	Contributing	Portage
A12104.000051	Archaeological-not field identified	Site of Whaley's Saw Mill	Possible archaeological remains such as a fireplace, retaining wall, dam, and mill race.	Early 19th century	Contributing	Castile

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
12104.000078	Bridges	Bridge over Unnamed Creek	Contract awarded to contractors Charles Ingersoll and William Barhite of Medina on May 28, 1931. North of St. Helena and south of Gardeau Overlook.	1931	Contributing	Castile
	Bridges	De-ga-wa-nus Creek Bridge	See also 11-Upper/Middle Falls Picnic Area.	1934	Contributing	Genesee Falls
	Bridges	De-ga-wa-nus Creek Footbridge	See also 11- Upper/Middle Falls Picnic Area.	1930	Contributing	Genesee Falls
12108.000197	Bridges	Dehgayasoh Creek Bridge	Single-span concrete arch bridge with stone veneer; 87 ft. long. Bid accepted from M.E. Colle Inc. of LeRoy on April 8, 1929.	1929-1930	Contributing	Genesee Falls
	Bridges	Footbridge along Upper Falls Trail	See also 11-Upper/Middle Falls Picnic Area.	1931	Contributing	Genesee Falls
	Bridges	Inspiration Point Footbridge	Small bridge over man-made pond. See also 19-Inspiration Point Area.	1939	Contributing	Genesee Falls
	Bridges	Lower Falls Footbridge Area	See also 23-Lower Falls Footbridge Area.	1935	Contributing	Genesee Falls
05106.000124	Bridges	Silver Lake Outlet Bridge	Single-span concrete arch bridge with stone masonry veneer, back filled with earth and an asphalt roadway. Railings, sidewalks, and wing walls are reinforced concrete with stone veneer, except for dry laid stone gravity wing wall extension at the southwest corner of the arch. Four catch basins in the roadway beyond the corners of the arch to provide drainage. WPA project; drawings by Charles I. Cromwell.	1935-1936	Contributing	Leicester
12104.000079	Bridges	St. Helena Creek Bridge	Single-span concrete arch bridge with stone veneer. Contract awarded to Charles Ingersoll and William Berhite of Medina,	1931	Contributing	Castile

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
			NY, on May 28, 1931.			
	Bridges	Wolf Creek Bridge	See also 27-Wolf Creek Area	1927	Contributing	Castile
	Bridges	Wolf Creek Footbridge	See also 27-Wolf Creek Area.	1989	Non-Contributing	Castile
05113.000027 and 12108.000030	Erie Railroad Corridor	Erie Railroad	The second, or iron bridge of the Erie Railroad at Portage by the Upper Falls took the place of the wooden bridge which was destroyed by fire in 1875. The second bridge was designed by engineer George S. Morison and features Pratt trusses; manufactured by the Watson Mfg. Co., Patterson, NJ. Other structures related to the railroad include the tracks and railroad reservoir.	ca. 1851. Present bridge built in 1875	Contributing	Genesee Falls/Portage
05113.000008 and 05113.000001	Genesee Valley Canal/ Railway Corridor	Remains of the Genesee Valley Canal and Genesee Valley Canal Railroad	Canal bed, stone walls of 7 locks, towpath, stone piers of former aqueduct, abandoned tunnel. Railroad remains: abandoned bed, wooden ties, usually within the canal bed.	ca. 1836-1852. Canal was abandoned in 1878. In 1880 became railway. Used until 1950s.	Contributing	Portage/ Genesee Falls
12108.000198	Miscellaneous	Site of the Archery Field	Open field once used for archery. Bounded to the west by forest and a minor road, to the south by woods, and to the east and north by the main Park Road.	1931	Contributing	Genesee Falls
05113.000065	Miscellaneous	Stone posts at south entrance to River Road	Stone posts of undetermined age. These were either the entrance posts to Colonel George William's Ravenswood Estate or for the park entrance and contact station in the 1930s.	Either mid-nineteenth century or ca. 1930	Contributing	Portage
12104.000080	Miscellaneous	Stone posts at top of DeGolyer Road	Stone posts approximately 6 feet in height. Marked former entrance to the park.	1930	Contributing	Castile
05106.000126 and	Mt. Morris Dam	Mt. Morris Dam	Flood Control Dam. Concrete structure. The dam was engineered to control 2,476 square	Congress authorized construction of the	Contributing	Leicester/ Mt. Morris

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
05109.000038			miles of watershed.	dam in 1944. Actual construction began in 1948; the dam was completed in 1951.		
	Park wide	Culverts	Over 900 culverts in the park, based on Bridge and Culvert Inventory Forms surveyed between 1988 and 1990. Report located in the Engineering Department, Genesee State Park and Recreation Commission.	1910-present	Contributing	Whole park
	Park wide	Overlooks	Pedestrian and automobile overlooks located primarily along the main park road on the east and west sides of Letchworth State Park. All have stone walls between the road turn-off and the gorge.	1859-1955?	Contributing	Whole park
	Park wide	Roads	Road system runs throughout the park, with a main Park Road on both the west and east sides of the park. South end roads originally laid out by William Letchworth and the American Scenic and Historic Preservation Society. North end roads built by the Civilian Conservation Corps. Road to the Mt. Morris Dam designed by Department of Transportation.	1859-1952	Contributing	Whole park
	Park wide	Stone walls	Stone walls run throughout the park, concentrated in the south end. Built by William Letchworth, the American Scenic and Historic Preservation Society, the Civilian Conservation Corps, and the Genesee State Park Region.	1859-present	Contributing	Whole park
	Park wide	Trails	28 trails run throughout the park. Many are along the route of old settlement roads, others lead to spots of scenic importance. Many were laid out by William Letchworth	Prehistoric- present	Contributing	Whole park

Unique Site #	Geographic Area	Name of Property	Description	Date	Status	Town
			and William Webster. Others were planned by the Park once land was acquired from the construction of the Mt. Morris Dam. The Genesee Greenway and Finger Lakes Trails were established by groups outside the Genesee State Park Region.			
05106.000127	Reservoirs	Perry Reservoir	Not seen	1955	Non-contributing	Leicester
12108.000199	Reservoirs	Reservoir at Lower Falls Area	Below-ground concrete structure with asphalt-shingled gable roof.	ca. 1940	Contributing	Genesee Falls
12108.000200	Reservoirs	Reservoir at Middle Falls	Below-ground concrete structure with asphalt-shingled gable roof. Outside area off maintenance road.	ca. 1940	Contributing	Genesee Falls
12104.000081	Reservoirs	Reservoir at Tea Table/Eddy's Area	Below-ground concrete structure with asphalt-shingled gable roof.	ca. 1940	Contributing	Castile
12104.000082	Reservoirs	St. Helena Reservoir	Not seen	1955	Non-contributing	Castile

Letchworth State Park
Name of Property

Wyoming and Livingston Counties, New York
County and State

8. Statement of Significance

Applicable National Register Criteria
(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing.)

[X] **A** Property associated with events that have made a significant contribution to the broad patterns of our history.

[X] **B** Property is associated with the lives of persons significant in our past.

[X] **C** Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.

[x] **D** Property has yielded, or is likely to yield, information important in prehistory or history.

Criteria Considerations
(Mark "x" in all boxes that apply.)

[ ] **A** owned by a religious institution or used for religious purposes.

[x] **B** removed from its original location

[x] **C** a birthplace or grave

[x] **D** a cemetery

[x] **E** a reconstructed building, object, or structure

[x] **F** a commemorative property

[ ] **G** less than 50 years of age or achieved significance within the past 50 years

Areas of Significance:
(Enter categories from instructions)

agriculture, architecture, archaeology, art, conservation, engineering, recreation, ethnic heritage, settlement, landscape architecture, military, science, social history, transportation

Period of Significance:

1000 BC - 1952

Significant Dates:

1776, 1797, 1823, 1831, 1856, 1859, 1875, 1907, 1910, 1930, 1933-1942, 1948-52

Significant Person:

William Letchworth

Mary Jemison

Cultural Affiliation:

Iroquoian, Pre-Iroquoian

Architect/Builder:

Various

(See continuation sheet at end of Sect. 8)

Narrative Statement of Significance
(Explain the significance of the property on one or more continuation sheets.)

9. Major Bibliographical References

Bibliography
(Cite the books, articles, and other sources used in preparing this form on one or more continuation sheets.)

Previous documentation on file (NPS):

[ ] preliminary determination of individual listing (36 CFR 67) has been requested.
[ ] previously listed in the National Register
[ ] previously determined eligible by the National Register
[ ] designated a National Historic Landmark
[ ] recorded by historic American Building Survey
_____
[ ] recorded by Historic American Engineering Record
_____

Primary location of additional data:

[x] State Historic Preservation Office
[x] Other State agency
[ ] Federal Agency
[ ] Local Government
[ ] University
[ ] Other repository: _____

8. Statement of Significance

Introduction

Letchworth State Park is a 14,345-acre park located on both sides of the Genesee River in Livingston and Wyoming Counties, New York. The park was first established around the three waterfalls and the high gorge walls at the south end of the park, near the town of Portageville. Today the park surrounds these dramatic falls, the gentle Gardeau Flats near the center of the park, and the steep, high banks leading north to the Mt. Morris Dam.

The land within today's park boundaries has had a rich and multi-layered history. This history begins with the land's occupation by early pre-Iroquoian Native Americans, through the Seneca historic period, and into the era of settlement and transportation development by European Americans. The land around the falls was then purchased by William Pryor Letchworth, who made the acquisition, conservation, and preservation of this land a major part of his life's work. His eventual gift of his 1,000-acres of land to the state of New York, under the stewardship of the American Scenic and Historic Preservation Society, formed the nucleus of the development that has gradually increased the size of the park. In 1933, under the auspices of the Genesee State Park Region, the Civilian Conservation Corps (CCC) built numerous structures, laid out new roads, and led to the expansion of the park from simply scenic to recreational. The construction of the Mt. Morris Dam, completed in 1952, led to the final stages of large-scale development with the gift and lease of lands from the federal government to the current north end of the park.

Letchworth State Park meets Criteria A, B, C, and D and is significant at local, state, and national levels. By far the single-most important figure associated with the park is William Pryor Letchworth. His efforts towards conservation of natural lands, his preservation of Seneca structures, and primarily his dedication to charity work made him a leading, though relatively unknown, figure in nineteenth-century history. His pioneering spirit in the care of orphan children, the mentally disabled, and epileptics led to formation of new national policies and innovative techniques in care for these diverse groups. His purchase and preservation efforts on behalf of the Genesee River gorge and falls was far ahead of his time, as the formation of most national preservation organizations would not occur for another few decades.

The development of Letchworth State Park in the 1930s also affected national policies on park design which were being formed by the National Park Service. With the formation of the CCC in 1933, the National Park Service had architects and landscape designers who were in need of guidance in rustic park design. The Adirondack style, which was popular in the New York region, was an excellent example of the regional design philosophy they encouraged. Letchworth State Park had built a number of structures in this style, many of which were featured in the 1935 publication *Park Structures and Facilities*. This book inspired designers across the country by giving examples of successful architectural plans.

Areas of Significance

A. Letchworth State Park is associated with events that have made a significant contribution to the broad patterns of our history.

Agriculture
Letchworth State Park is agriculturally significant under Criterion A as a nineteenth-century farm estate, and for the experimental short-horn cattle breeding program used by William Letchworth at Chestnut Lawn Farm. Buildings representing this significance include Prospect Home and Barn, Lauterbrunnen House and Barn, the Glen Iris, and the trails, which run along old farming roads, and can be found throughout the park.

Conservation/Preservation
Letchworth State Park has been a subject of significant conservation of land and preservation of historic resources since William P. Letchworth purchased the property in 1859. While he was impressed with the beauty of the land around the Genesee Falls, William Letchworth was also concerned about restoring the land around the falls to its original condition, prior to plundering by the settlers and lumbermen in the early nineteenth century. Letchworth bought 1,000 acres of land around the falls and planted between 8,000 and 9,000 trees on his property. He also preserved buildings built in the area by early settlers and the Seneca who once owned these lands. Letchworth gave his property to the state of New York and to the stewardship of the American Scenic and Historic Preservation Society (ASHPS) in 1907, so that it could be protected from financiers who hoped to make money by damming up the Genesee River above the falls. Both the ASHPS and the state have protected the land through the twentieth century, as well as purchasing more land to protect the gorge from future development. They also preserved many of the buildings and objects erected by Letchworth during his years as owner of what is now Letchworth State Park. It is also significant for the work on the arboretum, where over fifty blocks of trees were planted at the south end of the park between 1912 and 1919. These trees were planted in former farm fields and were designed to be a study collection for dendrologists and foresters around the world. Significant resources representing conservation and preservation include the Caneadea Council House, the Nancy Jemison Cabin, the Glen Iris, Prospect Home, Littledyke House, the arboretum, the trails, and the park itself.

Entertainment/Recreation
Letchworth State Park is significant under Criterion A for recreation for the numerous built resources erected by the American Scenic and Historic Preservation Society (ASHPS) and the Genesee State Park Region. William Letchworth gave the original 1,000 acres of the modern park to the state of New York in 1907, with the agreement that the ASHPS would administer the park and act as stewards. After his death in 1910, the park was formally opened to the public and services were gradually provided for the numerous visitors. Today there are buildings and structures such as comfort stations, pools, bathhouses, cabins, camping areas, restaurants, concession stands, parking areas, trails, overlooks, picnic tables, and shelters which were built by the park administration for the use of visitors. Many of these were built by the Civilian Conservation Corps (CCC), who worked in the camp from 1933 until 1942. It is estimated that their work pushed park development forward by at least ten years.

Ethnic Heritage

The land in Letchworth State Park is significant under Criterion A for its development and use by Native Americans. From the late sixteenth through the late eighteenth centuries the land within Letchworth State Park was owned by the Seneca tribe. They roamed throughout the river valley, eventually settling into three areas within the modern park boundaries. Deo-wes-ta stood on the east side of the river between the Lower Falls and the modern hamlet of Portageville; Ga-da-ho or Gardeau, was situated on the flats north of the Lower Falls on the west side of the river; and De-yu-it-ga-oh, also known as Squawkie Hill, was located on the bluffs near the north end of the park on the west side of the river. After the Revolutionary War, the land on the east side of the river was confiscated by New York as punishment for the Seneca siding with the British during the war. All of the land on the west side of the river except for 12 reservations was sold to William Morris in 1797 at the Treaty of Big Tree. Two of these reservations were partially inside modern park boundaries. The first, Squawkie Hill Reservation, was near the present day village of Mt. Morris. The second, Gardeau Reservation, was a privately owned reservation on the Gardeau Flats and was located on both sides of the river near the center of the modern park. Both reservations were sold in the 1820s and the presence of the Seneca in the Genesee Valley was essentially over.

Exploration/Settlement

Letchworth State Park is significant under Criterion A for its importance as a new area of settlement in the late-eighteenth and early-nineteenth centuries. Beginning after the Revolutionary War, the area around the Genesee River began to be settled by European Americans, particularly individuals from New England. After the Big Tree Treaty with the Seneca in 1797, small villages began to be established, including the hamlets of Genesee Falls, Portage Falls, Gibsonville, and St. Helena. Many of the settlers turned to lumbering when they first arrived in the area, and once their lands were cleared they began farming. The mills along the river led to a great deal of clearing of trees, particularly in the area around the falls. These settlers and settlements, while they are no longer established, have left their mark on the landscape of Letchworth State Park. Trails lead to the old settlements, the Pioneer cemetery contains the remains of many of the early founders, and buildings such as Prospect Home, Littledyke House, and the Glen Iris Inn are reminders of the significant contributions of the early residents of these lands.

Industry

Letchworth State Park is significant under Criterion A for its contributions to the field of industry. Early settlers in the Genesee River gorge area turned to milling to make money and clear their land during the early nineteenth century. Sawmills sprang up all along the river during the early settlement period as new residents attempted to clear their heavily forested lands. The lumber industry became so profitable that within fifty years the land around the river had been cleared of all trees. Mills were also built to plane the lumber into blinds and sashes and turn the wood into paper. The popularity of the mills in what is now Letchworth State Park did not end until the early twentieth century. Archaeological remains of some of these mills can be found within the park. During the 1930s a new sawmill was established in the park and run by the Civilian Conservation Corps (CCC) to provide building material for the cabins, shelters, and comfort stations built during this period. This sawmill is still being used by the park to provide material for repairs and the new buildings which are being erected.

Military
Land that is now part of Letchworth State Park is significant under Criterion A for its association with the training ground for two regiments during the Civil War. Land on the east side of the river, now known as the Parade Grounds, was used in 1862 as the training site for the last two regiments of volunteer infantry from the area, the 130th and the 136th New York Infantry. Both units went on to distinguish themselves in battle, and the 130th became the 1st New York Dragoons, the only mounted infantry unit in the United States army at that time.

Science
Letchworth State Park is significant under Criterion A for its association with the geologic formation known as the "Portage Group." Dr. James Hall, state geologist for the Western district of New York, came to the Genesee Gorge in 1843 and was impressed by the visibility of the layers of rock in the steep gorge walls at the south end of the park. He named this particular geologic formation the "Portage Group" for the nearby town of Portage on the east side of the Genesee River. While this formation can be found throughout this part of the United States, it carries the name for the site where it is most visible.

Social History
Letchworth State Park is significant under Criterion A for William Pryor Letchworth's work as a social reformer during the late nineteenth and early twentieth centuries. He was concerned about the plight of the poor, orphans, the mentally disabled, and epileptics. During his residence at the Homestead, now the Glen Iris Inn, he wrote numerous texts on charity reform, including *the Insane in Foreign Countries (1889), Juvenile offenders: Industrial training of children in houses of refuge & other reformatory schools (1883),* and *The Care and Treatment of Epileptics (1899).* Letchworth established the Wyoming Benevolent Institute in Wyoming County, New York, and through this organization he brought groups of orphan children from Buffalo to stay at Prospect Home farm and enjoy a week in the country. He felt that clean air and open surroundings would help the children develop properly, both physically and mentally. Letchworth also opened his estate to the public, again with the notion that beautiful natural surroundings would improve the outlook and lives of the people who came to visit from more crowded industrial areas.

Transportation
Letchworth State Park is significant under Criterion A for its participation in the growth and development of both the railroad and the canal systems in the United States. The Genesee Valley Canal was designed to move people and materials from throughout the Genesee Valley to the Erie Canal and the southern tier of New York, where they could then be carried between the eastern states and the interior of the continent. The canal building began in 1836, and was completely finished in 1856. The section of the canal through the modern park was the most difficult, requiring a two-mile, fifty-foot deep channel, seven locks to raise the height of the waterway, an attempt at a tunnel, and finally pinning the canal to the edge of the gorge. The canal was never financially successful, and in 1880 it was sold to the Genesee Valley Canal Railroad Company to be used as the route of the railroad, which ran until the 1950s.

The first railroad to pass through the modern park boundaries was the Erie Railroad, which ran from New York City to Buffalo. To make the journey, the Genesee River had to be crossed. A wooden bridge was erected in 1852 over the gorge, just above the Upper Falls. It was believed to have been the largest and highest wooden bridge in the world. When it burned in 1875, it was replaced with the present iron bridge. The rail line is still in use today by Norfolk Southern railways.

B. *Letchworth State Park is associated with the lives of persons significant in our past.*

William Letchworth
William Letchworth was a well-known social reformer and philanthropist, who bought the land around the three falls of the Genesee River beginning in 1859 and established his home here. He rehabilitated the land and eventually gave it to the state of New York for a public park. Letchworth also preceded the growth of the Conservation Movement through his efforts to preserve and restore the Genesee gorge for future generations and save remnants of Seneca history from the Genesee Region. At his home, now the Glen Iris Inn, he wrote numerous tracts and worked to improve the conditions of orphans, the mentally disabled, and epileptics. He worked with crusading figures in American history, including Clara Barton, Dorothea Dix, and Carrie Chapman Catt. His work with the New York State Board of Charities and the National Conference of Charities and Correction led to a greater concern about the treatment of children in foster homes and the public care of epileptics.

Mary Jemison
Mary Jemison, "The White Woman of the Genesee," spent over fifty years of her adult life living on the Gardeau Flats, near the center of what is now Letchworth State Park. First as a captive and then as a member of the Seneca tribe, Mary was an observer and chronicler of an important period of Seneca history, and a contemporary of famous Native Americans such as Cornplanter, Red Jacket, and Handsome Lake. As a token of respect she was given the Gardeau Reservation, an 18,000-acre tract of land on both sides of the Genesee River, in 1797. Much of the land in the grant is within today's park boundaries. While her home did not survive, the log house she built for her daughter Nancy was purchased by William Letchworth and moved to the Council House Grounds on his estate to be restored and preserved. Mary Jemison's body was also moved to the Council House Grounds of the estate to protect it from the expansion of the city of Buffalo. A marble marker and a bronze statue were erected by William Letchworth in her honor.

C. Letchworth State Park embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.

Architecture
Letchworth State Park is architecturally significant under Criterion C for the range of historic building types, styles, and construction techniques found within its borders. This significance stems from the multiple layers of history the park represents from the nineteenth-century Greek Revival farmhouses of early settlers to the Rustic style cabins and picnic shelters of the Civilian Conservation Corps.

The earliest buildings in the park are the Caneadea Council House (ca. 1776) and the Nancy Jemison Cabin (ca. 1800), both examples of vernacular Native American building techniques after contact with European Americans. Both are log buildings and are the only surviving structures of their type built by the Seneca during the eighteenth century and the reservation period. William Letchworth moved these buildings to the site in 1872 and 1880.

The Littledyke House and the Glen Iris are the two examples of the Greek Revival styles in the park. Both have cubic massing, symmetrical fenestration, cornice returns, and classical porch posts which are common to this style of architecture. The Littledyke House was built ca. 1840-1850, and was the home of a farmer who lived outside of the hamlet of Gibsonville. The Glen Iris was begun in 1830 and was expanded in 1880 when it was the home of William Letchworth. It is a higher style residence, with a two-story portico and monumental column designs.

The Swiss chalet-style, which was made popular by A.J. Downing during the mid-nineteenth century, is represented by Lauterbrunnen and its outbuildings, built in 1880 for William Letchworth by landscape architect William Webster. It is an excellent example of the style, with sawtooth shingles around the doors, elaborately carved barge boards, and King's post trusses in the gables. The barn for the house continues the style, with finials at the gable ends and a carved barge board.

Prospect Home was built by Perry Jones in the early- to mid-nineteenth century, probably as a vernacular Greek Revival-style residence. William Letchworth altered the house in the 1870s to an Italianate design with hood moldings over the windows and broad eaves. The decorative barge board alludes to the Swiss Chalet style also seen at Lauterbrunnen. The barn for the property continues the style, with a cupola at the top with louvered windows.

The Arts and Crafts style can be seen in a handful of buildings in Letchworth Park which were built in the early twentieth century. The William Whitmore House is an example of the Bungalow style as it was applied to a private residence ca. 1915-1925. The house and land around were purchased by the state of New York as part of

the northern expansion of the park. The house is low-slung, with wood shingles, a rustic stonework foundation, chimney, and porch, and exposed rafter tails.

The American Scenic and Historic Preservation Society built a number of structures in the park in the Arts and Crafts style. Rustic materials were used, but in the Middle Falls Comfort Station (1913), classical piers were used to create a large colonnade. At the Pioneer and Indian Museum (1912), the rustic stonework of the building is combined with a jerkinhead roof, and an elaborate entranceway with Doric columns and an elliptical fan light. A second comfort station at the Upper Falls (1929-1930) shows the Arts and Crafts influence with the use of exposed rafter tails and wood shingles.

By far the most prevalent style in the park is the rustic style favored by the park from the 1930s through the 1950s. Many of the buildings and structures in Letchworth State Park in this style were built by the men of the Civilian Conservation Corps (CCC) and designed by park architect Charles I. Cromwell. The buildings were inspired by pioneer and Native American building techniques, particularly the Adirondack style, which was popular throughout the Northeast. The buildings were made of natural materials, usually had a low silhouette, and were designed to blend in with the natural environment. Between 1933 and 1942 the CCC built cabins, shelters, and comfort stations. The style was also used in the design of the Commission House (1937) and the Eddy's Comfort Station (1940), both built by Attica Prison Labor. The style continued to be popular for a number of years after World War II, leading to the construction of the Administration building (1950), later comfort stations, the Lower Falls restaurant and bathhouse (1948-1950), and the park contact stations (1959).

The Stone House at Inspiration Point is an excellent example of the Colonial Revival style of architecture. Built in 1938-39 by the CCC and designed by park architect Charles I. Cromwell, the Stone House has a symmetrical center entrance façade, gabled porch and dormers, and six-over-six double-hung sash windows.

Letchworth State Park contains many support structures and outbuildings which are significant for their use in helping the park operate efficiently. These buildings are utilitarian in design, and the represent various time periods, from the greenhouse at Prospect Home (late nineteenth century), to the sawmill (ca. 1930s), and the south police garage (1920). These buildings are located throughout the park and represent all of the necessary support work that goes into operating a large state park.

Art

The statue of Mary Jemison at the Council House Grounds is a significant work of sculptor Henry K. Bush-Brown (1857-1935), famous for his equestrian statues of Generals Mead, Reynolds, and Sedgewick at Gettysburg, Pa, and General Anthony Wayne at Valley Forge, Pa. He is represented in the Metropolitan Museum of Art, the Atlanta Museum, and The National Museum in Washington DC. A painted plaster copy for his Mary Jemison statue, possibly the initial cast from the mold, is located in the Smithsonian Institution, National Museum of American Art in Washington DC.

Engineering
Letchworth State Park is significant under Criterion C for three engineering structures within its boundaries. The first, at the south end of the park, is the Portage High Bridge, erected in 1875. Built to replace the wooden bridge that had stood in this spot since 1852, the iron bridge across the gorge was designed to carry trains along the Erie Railroad line. It is 235 feet high, 820 feet long, and was built in only 82 days. It is still in use by Norfolk Southern Railway.

The Mt. Morris Dam was begun in 1948 and completed by 1952. It is designed to control the floods that regularly inundate the towns to the north of the park, including the city of Rochester. It is the largest concrete gravity dam east of the Mississippi River. Built under the auspices of the United States Corps of Engineers, it is 1,026 feet long, and controls 2,476 square miles of watershed. It has prevented sever flooding on a number of occasions, particularly during the storms caused by Tropical Storm Agnes in 1972.

The Genesee Valley Canal was started in 1836 and completed in 1856. It was designed to move people and goods between the Erie Canal at Rochester and the southern tier, with access to the Ohio River and eventually the Mississippi River. The section of the canal through the modern park boundaries was the most difficult section to build, involving the digging of a two-mile, fifty-foot channel, the construction of seven locks with a little over a mile, the digging of a tunnel, the eventual blasting away of part of the gorge wall to create a canal and towpath that were "pinned" to the side of the gorge above the river, and an aqueduct above the Upper Falls at Portageville. The canal was sold in 1880 to the Genesee Valley Canal Railroad Company, who used part of the towpath and the canal bed as the route for the rail lines.

The most visible engineering structures in the park are the numerous roads, bridges, trails, and reservoirs built by the Civilian Conservation Corps from 1933 through 1940. Development work in the park was moved forward approximately ten years due to the efforts of the men stationed at the four camps located within the park. The park designers, particularly Charles I. Cromwell, worked with the National Park Service to plan structures that would carry visitors throughout the park without impinging on the natural environment. One of their most amazing feats is the stone veneer Lower Falls Footbridge, which was erected by hand without any scaffolding or means of support other than the gorge walls.

Landscape Architecture
Letchworth State Park is a significant under Criterion C for its distinctive examples of landscape design beginning with the Romantic style landscape of William Webster beginning in 1860 through the designs of the Genesee State Park Region and the Civilian Conservation Corps in the 1940s.

William Webster's design for Letchworth's estate during the mid- to late-nineteenth century was in the Romantic style, with an emphasis on the beautiful and picturesque qualities of nature. A disciple of A.J. Downing, Webster worked to exaggerate the beauty of nature around the Homestead and other buildings on the estate, while designing views to allow people to enjoy the picturesque qualities of the larger site of the gorge and the Genesee River. Remnants of his designs can be seen around the Glen Iris Inn, Lauterbrunnen, and the Council House Grounds. Many of the roads, trails, and overlooks still used throughout the south end of the park

were laid out by Webster and Letchworth, and stone walls along the road below Lauterbrunnen still remain from this period. The roads were designed to provide spectacular views of the river and gorge, offering visitors a passive way to enjoy the beauty of the estate.

During the years of the stewardship of the American Scenic and Historic Preservation Society (1910-1930), the grounds of Letchworth's original 1,000-acre estate were simplified and opened up in anticipation of visitors. Many of the plantings designed by Webster were removed from the Council House Grounds and around the Glen Iris. This provided a more open and park-like setting, which was considered necessary to accommodate the influx of visitors who began to arrive once the automobile became accessible to the masses. The influence of the ASHPS can most clearly be seen at the Upper Middle Falls Picnic Area and in the numerous parking areas which were built in the south end of the park for the first time. The ASHPS also expanded the road system to the north to the Tea Table Area, following the road design and style already used by Webster in the nineteenth century.

With the arrival of the (CCC) in 1933, Letchworth State Park entered a new phase of development in landscape design. Master planning was very important to determine recreation and wilderness areas. The park expanded in size with the purchase of land to the north towards the proposed dam and along the east side of the river to protect the gorge. Recreation areas were kept separate from the park roads and were screened from view by the planting of trees. The recreation areas were kept as natural as possible, with the built resources screened by trees and rocks and kept at a minimum. The CCC expanded the trails system, using natural materials for walls, steps, and railings. Roads were built to reach the north end of the park, designed to carry visitors with the minimum of trouble away from the viewshed, rather than be scenic drives for visitors to enjoy the views of the gorge. Visitor enjoyment of the park was designed to be active, involving hiking, walking, picnicking, and other recreational activities.

D. *Letchworth State Park has yielded, or is likely to yield, information important in prehistory or history.*

Archaeology
Letchworth State Park is a significant resource under Criterion D for both prehistoric and historic archaeological remains of Native American settlements, and historic resources from the European settlement period. There are fifteen known archaeological sites in the park, eleven of which have been explored and recorded up to this point. In addition, it is quite likely that there are many other prehistoric and historic archaeological sites scattered throughout the park's lands that have not yet been explored. The variety of archaeological resources within the boundaries of Letchworth State Park offer examples of Native American life from the Early Woodland period through the arrival of European Americans in the Genesee Valley, and provide information about the lives of these new arrivals during the late-eighteenth and early nineteenth centuries.

One of the most significant sites is Squawkie Hill, a former Native American settlement dating from the Early Woodland period (140 AD). It is one of the few examples of Hopewellian mound building in New York state. Another site, Gardeau, was once a small Iroquois village, and also the home of Mary Jemison and her family. The abandoned villages of Gibsonville and St. Helena, on the edges of the former Gardeau Reservation, could yield information about the settlement and industry of the Genesee Valley in the nineteenth century.

Narrative Statement of Significance

Pre-Historic Occupation of the Genesee Valley[3]

The human occupation of the Genesee Region followed in the wake of glacial recession and the subsidence of a series of vast meltwater lakes which covered much of the region. As modern drainage patterns became established, pioneer plant communities of a park-tundra character gradually spread into the newly freed land. The animal communities that followed included numerous genera and species that were soon to become extinct and others, like the caribou and muskoxen, which now dwell in environments far to the north of western New York. Their human predators, called Paleo-Indians by archaeologists, probably lived in small, mobile extended family groups. These small bands probably united seasonally with other neighboring bands for trade and social interaction.

Paleo-Indian sites are recognized primarily by the presence of distinctive fluted spear points, known as Clovis points, among their stone tools. The Paleo-Indians are thought to have subsisted, in part, on large game mammals now extinct, as did their western counterparts, or upon other animals such as caribou. The remains of mastodon, mammoth, and Pleistocene forms of elk, deer, and peccary have been found in Genesee, Livingston, Ontario, and Monroe counties, New York.

The traces of Paleo-Indian occupation are rare in western New York, but sites of this period have occasionally been found on elevations overlooking former lakebeds and low marshy areas. No Paleo-Indian sites have as yet been directly dated in western New York, but radiocarbon dates from five fluted point sites in the Northeast suggest an antiquity of between 11,000 and 10,000 years.[4]

As the Pleistocene glaciers waned, a succession of changes took place in the plant and animal communities until about 4000 B.C., by which time essentially modern environmental conditions had developed. The human communities also adapted to the changing conditions with innovations in subsistence strategies, technology, and

[3] Adapted from the GZA GeoEnvironmental of New York. *Phase I and Phase II Cultural Resource Investigation for the Akzo Nobel Salt, Inc. Mining Permit Application Project Towns of Groveland, Geneseo, and Leicester, Livingston County*. July 1995, pages 13-18.

[4] Work is currently being done at the Lamb site in Batavia, New York. Points found here may date to the Paleo-Indian period.

social behavior. A 7000-year span from approximately 8000 B.C. to 1000 B.C. is known as the Archaic Period. The nature of the adaptations and innovations of the Early and Middle Archaic Periods (8000-4000 B.C.) are poorly understood in western New York. Few sites of this period are known, and fewer have been adequately studied. It would appear that populations were relatively low and were widely dispersed across the landscape. It is suggested that these people relied considerably upon aquatic and marshland resources, as these habitats may have presented the greatest biological carrying capacity in an otherwise immature and resource-poor northern forest. Evidence from throughout the Northeast suggests a considerable reliance upon fish, waterfowl, small mammals, and reptiles, as well as moose and white-tailed deer.

Throughout the late Archaic Period (4000-1000 B.C.), the aboriginal populations increased in proportion to the changing productivity of the temperate deciduous forest. An increase in the frequency and variety of mast-producing tree species provided greater forage for deer and turkeys, as well as a rich and storable staple for humans. Greater biological productivity of lakes and streams is also indicated. A broad spectrum subsistence strategy of hunting, fishing, and gathering presented the possibility of greater sedentism and increased settlement size. All in all, the success of this cultural pattern can be measured by its apparent stability and longevity.

The tool inventories of this period are noted for their diversity as well as their abundance. Tools of flaked chert include a variety of projectile forms, scrapers, drills, and knives. The raw material for these tools was mostly derived from the nearby Onondaga limestone formation. Igneous and metamorphic rock types obtained from the glacial till were pecked and ground into a wide variety of axes, adzes, gouges, spearthrowers, and fishing weights as well as food processing tools. Where soil conditions favor their preservation, bone and antler tools are not uncommon. These include needles, awls, fishhooks, harpoon points, and tools for flaking chert. Ornamental and recreational devices of bone, antler, and shell are also known and include beads, combs, rattles, and flutes. The extensive use of wood and basketry is inferred, and rare charred fragments of fishnets, trotlines, and textiles attest to considerable skill in these crafts. The first common appearance of funerary ceremonialism occurs in the Late Archaic Period. Non-perishable containers of soapstone appear at the end of the period, making a transition to the Woodland Period.

The Woodland Period (1000 B.C.- A.D. 1600) in western New York is distinguished from the Archaic primarily by the advent of ceramic containers. The period is divided into three subunits: Early, Middle, and Late. Subsistence strategies and settlement patterns during the Early and Middle Woodland Periods are in essence a continuation of the Archaic lifeways. What distinguishes these cultures materially are the increasing variety of and reliance upon ceramics for cooking and storage containers, the introduction of smoking pipes, and the increased development of widespread trade and communication of ideas across the entirety of the Eastern Woodlands. The earliest known sites in Letchworth State Park date from around 140 AD, during the Middle Woodland Period.

This widespread interaction is most clearly observable in the elaboration of mortuary practices demonstrating considerable influence from the highly developed Adena and Hopewell Cultures of Ohio in the Early and

Middle Woodland Periods, respectively. Several Hopewellian burial mounds have been located in the western and central sections of New York State, particularly at Squawkie Hill, in the modern town of Mt. Morris. These represent the northeastern-most extension of a cultural tradition that had its core areas in Ohio and Illinois but also extended as far west as Kansas City.

The Late Woodland Period, beginning about A.D. 1000, is distinguished from earlier cultural periods by several subsistence, technological, and social changes. The Owasco Culture, which is generally identified as the precursor of the historic Iroquois, is the first group in western New York known to have practiced extensive horticulture. The remains of maize and beans have been recovered from the Sackett Site, near the foot of Canandaigua Lake. Squash was probably cultivated as well. The bow and arrow are thought to have completely replaced the lance, javelin, and spearthrower/dart weapons of earlier times. Village sizes had grown substantially, and many were probably year-round settlements. Some villages, such as Sackett, were fortified in some fashion, and warfare of murder-feuding is first in common evidence. Hunting, fishing, and gathering continued to be important procurement activities.

Historic Overview of Native American Occupation

The transition from Owasco to identifiable Iroquoian cultures was gradual, and continuity of populations is inferred. By A.D. 1300, most of the archaeological indices of the Iroquoian tradition were in place. Sometime between A.D. 1500 and 1550, the locally scattered Iroquois, or Seneca, villages consolidated into two very large villages, each with an associated satellite village. These villages were moved every 15 to 20 years as ready supplies of wood and game and soil productivity diminished. The preferred village locations were no longer in the valley flats along the major rivers and creeks but on defensible hilltop locations. Special purpose camps of short duration may have been located in other environments, however, to gain access to particular resources. Village house types had changed from small circular or oval structures to the multifamily longhouses. An emphasis on canoe travel seems to have declined, and major overland trails were relied upon for travel.

In the early sixteenth century, the Seneca villages were located close together a few miles north of Hemlock Lake along Hemlock Outlet and Honeoye Creek. With each village abandonment, the Seneca moved northward two or three miles. Composed of one village and its satellite, the Western Seneca, followed the course of Spring Brook to its confluence with Honeoye Creek. The Eastern Seneca villages moved north and eastward to the Honeoye valley and later to the valley of Mud Creek, near Victor, New York.[5]

The Seneca proved to be influential in eastern North America far beyond what their small population and relatively restricted home range would suggest. Their population is estimated not to have exceeded 3000 to 4000 individuals, and their homeland to have been restricted to approximately 100 square miles in western New York, mostly in Livingston, Monroe, and Ontario counties. Nonetheless, at the height of their power, the Seneca

[5] The place names mentioned in this section of the nomination are the current place names for the different communities and bodies of water found in western New York.

sent war parties from western New York to sites along the St. Lawrence River in the north to at least the Tennessee River in the south, and from New England to the banks of the Mississippi River. If their political influence can be measured by the number and strength of their enemies, the Seneca were probably without parallel in the northeastern United States and eastern Canada.

European Contact

The beginning of the historic era in this part of western New York may be figured from about A.D. 1600. Available evidence indicates that Étienne Brulé, an agent of Samuel de Champlain, was likely the earliest European to explore the area in 1610. European contact brought about considerable change in the native cultures. The economic imperative of the fur trade and the demand for European goods affected the subsistence, social, technological, and political structure of aboriginal life. Conflicting alliances with competing European powers and economic competition between tribes intensified the earlier pattern of small-scale intergroup warfare. As the beaver populations declined in traditional Seneca hunting territories, Seneca military might was applied to the conquest of further beaver grounds and to control the fur trade as middlemen. Between 1600 and 1650, many aboriginal groups were dispersed or eliminated. In 1680, six hundred Seneca warriors raided as far west as the Illinois and Mississippi Rivers and destroyed the might of the Illini Confederacy. At about the same time, the Ohio River Valley was essentially depopulated.

The Iroquois had formed an elaborate confederacy of five nations by the end of the sixteenth century, and were called the "People of the Long House."[6] Councils were regularly held to discuss problems, plan war parties, and settle disputes. The Seneca occupied the western-most portion of the Iroquois Confederacy and were called the "Keeper of the Western Door" during a period of time which extended roughly from the middle of the seventeenth century until the end of the American Revolution. The Senecas were considered by some to be the most warlike and powerful. During the mid-1600s they conquered both the Kah-Kwas and the Erie Indians, giving them undisputed claim to the lands west and south of the Genesee River as far as the Niagara River.

In 1687 all of the Seneca villages in the area of Hemlock Lake and Honeoye Creek were destroyed by the French under the orders of the French governor of New France, the Marquis de Denonville. Most of the settlements were eventually relocated between the Genesee River flats of the Geneseo area and the area at the north end of Canandaigua Lake. The area was called the Gen-nis-he-o, or beautiful valley. The fertile land of the valley brought in plentiful harvests of vegetables and grain from fields and fruit from orchards. Three of the villages are known to have been within the modern boundaries of Letchworth State Park. Deo-wes-ta was a scattered village that lay on the east side of the river between the lower falls and the modern hamlet of Portageville; De-yu-it-ga-oh, or Squawkie Hill, located on the bluffs near the present site of the Mt. Morris dam on the west side of the Genesee; and Ga-da-ho or Gardeau, a small, previously abandoned village which lay in the flats north of the lower falls on both sides of the river. Since the Seneca were farmers as well as hunters, when the soil wore out they would move their villages. There are likely to be more village remains scattered

[6]After 1715 the League was known as the Six Nations, due to the addition of the Tuscaroras from North Carolina, who had been defeated by the British settlers in the Tuscarora War.

around the park; however, the three listed above were the only settlements in the area upon the arrival of European-Americans. Gardeau was to become the best known of the three settlements in the current park boundaries. In the eighteenth and nineteenth centuries it was the home of Mary Jemison, the famous White Woman of the Genesee.

Mary Jemison[7]

Mary Jemison was born about 1743 during the voyage of her parents from Ireland to America. In 1758 she was taken captive at Marsh Creek, Pennsylvania, by a Shawnee war party. Her parents, with her sister and two of her brothers, were slain. Her life was spared and she was given to two Seneca sisters, by whom she was taken to their village about eighty miles down the Ohio River. There she was adopted as a sister and named Deh-ge-wa-nus (Two Falling Voices).

In the second year of her captivity, 1760, she was married to a Delaware Indian named She-nin-jee, who, like her adoptive sisters, treated her with kindness and respect. The family into which she was adopted was Iroquois Seneca originally from the Genesee River Valley. She and her husband, with several other Seneca including her adopted brothers[8], decided to relocate to the Genesee Valley and left the Ohio Valley as a party in the spring of 1762. She-nin-jee briefly left the party in early summer 1762 and was to later rejoin them. In late summer he was taken ill and died away from his family. He never saw his wife again, who gave birth to their son, Thomas, later that fall. She, with her newborn son and two adoptive brothers, remained with the party and continued the long journey of about six hundred miles from the Ohio River Valley to the Genesee River Valley. The party traveled on foot and Mary Jemison carried her infant son Thomas on her back. During this journey she and her family rested at the Seneca village of Caneadea, located south of the present park boundaries.

When Mary Jemison and her infant son arrived in the Genesee Valley in early 1763, they made their new home at the Seneca stronghold, Little Beard's Town, on the Genesee River (near present day Cuylerville). Mary Jemison was now twenty years of age and was soon remarried to the respected elder Seneca chieftain, Hiokatoo. They remained at Little Beard's Town for nearly seventeen years until late in the summer of 1779, during which time she and her second husband had four daughters and three sons.

The American Revolution divided the loyalties of the different tribes of the Iroquois Confederacy. The Seneca,

---

[7]Adapted from Crawford & Stearns, *Historic Structure Report: Nancy Jemison Log Cabin, Letchworth State Park, Castile, New York*, (Syracuse, NY: September 1995).

[8] Mary Jemison's life story was told to Dr. James E. Seaver in 1823 and published under the title of *A Narrative of the Life of Mary Jemison, The White Woman of the Genesee*. This story was reprinted and edited by a number of writers, including William Letchworth. In 1918 the American Scenic and Historic Preservation Society reprinted a new edition of the text in its original form from Seaver's first edition. Textual facts have been taken from this version. While most other sources say that Mary went to the Genesee Valley with her adopted sisters, according to the original version she traveled with her adopted brothers. According to the notes to the text, the sisters had already moved to the Genesee Valley.

the most powerful of the six tribes, chose to side with the British. During the war they attacked white settlers on the frontier and proved a major threat to the Revolutionary War effort. In 1779, the Clinton-Sullivan campaign was ordered by George Washington to break the Iroquois military might in the then central/western New York frontier all the way to Fort Niagara. The scorched earth tactic employed by the campaign literally burned and destroyed every Seneca settlement and agricultural development in its path. In August of 1779, the campaign reached Little Beard's Town and the fertile agricultural flats of the Genesee Valley.

Like other Seneca settlements, Little Beard's Town and the surrounding area of the valley were destroyed and the extensive crops and orchards were cut and burned. Mary Jemison, her family and the other Seneca fled the Genesee Valley for the Buffalo area. However, while most of the other Seneca left the valley for good to relocate near Buffalo, Mary Jemison and her family went only to the next valley west where they hid in the alders at the foot of Silver Lake while General Sullivan was laying waste to Seneca villages in the Genesee Valley.

When she and her family returned to the valley in the fall of 1779 after the Clinton-Sullivan campaign, they could not find food or shelter for the ensuing winter season. She later told her biographer, Dr. James E. Seaver, that, "Accordingly we all returned to Little Beard's Town; but what were our feelings when we found that there was not a mouthful of any kind of sustenance left, not even enough to keep a child one day from perishing from hunger." Thus, they were forced to search for food and shelter farther south in the river valley. Following the river south, Mary Jemison and her family found a small cabin occupied by two Negroes in the vicinity of Gardeau Flats.

Mary Jemison and her aged husband Hiokatoo (71 years of age) had five children with them in 1779: Thomas (17 years of age), John (13 years of age), Nancy (6 years of age), Betsey (2 years of age), and Polly (less than one year old). The Negroes had grown a crop of corn on the flats. Eager to find shelter for her family, Mary Jemison hired out to the Negroes to shell the corn crop from which she earned twenty-five bushels, which was enough to keep her family alive that winter. It is believed that she and her family also lived with the Negro family in the small cabin during the unusually harsh winter of 1779-1780. In the spring of 1780 she built her own cabin at the southern end of the Gardeau Flats.

It is inferred from local lore that when she came to the Gardeau Flats area in 1779, that the location of the Negro cabin was somewhat north of Gardeau Flats, possibly in the vicinity of the Smoky Hollow area. However, the exact location and particulars of the cabin that she shared with the Negroes in 1779 are not documented. The fate of the Negroes after 1780 is also undocumented.

After the Revolution, Mary Jemison was given the opportunity to return to white man's culture. She refused to leave her adopted people, the Seneca, whom she loved and respected. She opted to stay with her family at Gardeau Flats and maintain her Seneca family environment and traditions on the land owned by the Seneca.

At the Big Tree Treaty, signed in 1797, the Seneca gave up their rights to most of the lands west of the Genesee River. It was during the negotiations of this treaty that Mary Jemison was instrumental, for both sides. Twelve

reservations were set out in what is now western New York State for Seneca ownership and occupation. Of these reservations, Mary Jemison received the Gardeau Flats with nearly 18,000 acres of land, called the Gardeau Reservation, as a personal grant for her use. The extensive Gardeau Reservation was the fifth largest of the twelve western New York Indian reservations. It is located on both sides of the Genesee River in the present day towns of Castile and Mt. Morris. It was over six miles long east to west and nearly 4 ¾ miles wide from north to south. This was distinctive in that few other such land grants were given to individual Indians, and none, before or since, to a woman. Cornplanter, for example, had received a similar land grant from the Commonwealth of Pennsylvania after the Revolution. The grant of land to Mary Jemison by the United States government and the Seneca chiefs was made in appreciation and respect for her by her fellow Seneca. The Gardeau Reservation straddled the Genesee River and held some of the most prime agricultural lands in the region. It is about this time, c. 1797, that she is believed to have built the two cabins for her daughters, Nancy and Betsey.

By 1811, Mary Jemison and her family had resided on the Gardeau Flats for thirty-one years, and in that year, her second husband, Hiokatoo, died at the age of one hundred and three years. Tragically, all three of her sons, Thomas (d. 1811), Jesse (d. 1812), and John (d. 1817), were to be killed in fights. Thomas and Jesse were killed fighting with John, and he was later killed by two other Indians. After John's death in 1817, just three daughters of her eight children survived.[9] She and her daughters, Nancy, Betsey, and Polly, remained with their families at Gardeau Flats. White settlers continued to pressure her to sell her lands for development and in 1823 she finally agreed to sell off the majority of the Reservation lands. However, she retained ownership of a two square mile strip of land on the flats for her and her family's use. It was here, within her log cabin, during 1823 at Gardeau Flats that she was interviewed by Dr. James Seaver for his book to be published the following year. Seaver's popular book, *A Narrative of the Life of Mary Jemison* was published nine years prior to her death. The book made her life's story famous immediately, and she became the most widely recognized name of the hundreds of white Seneca captives.

While at Gardeau, Mary Jemison mingled freely and in a friendly but aloof manner with the white settlers on surrounding lands for the last thirty years of her life, gaining their respect and admiration. She remained upon her lands at Gardeau Flats until 1831, when she sold her beloved flats area and homestead and, at age eighty-eight, she and her three daughters, with families, removed to the Buffalo Creek Reservation, where she died September 19, 1833.

Mary Jemison was buried in the old Buffalo Creek Mission burial ground, then near the village of Buffalo; but in 1874, as the new city stretched its limits outward, it seemed probable that its streets would cut through the burial place. Her grandson, Dr. James Shongo, approached William P. Letchworth about the possible re-interment of her remains in the Genesee Valley. Under Dr. Shongo's guidance and through Letchworth's influence her remains were carefully disinterred and brought to Glen Iris, where they were buried upon the Council House Grounds with due ceremony on March 7, 1874.

[9]The other two daughters died at a young age.

A white marble pedestal resting on a local bluestone plinth marks her burial place at the Council House Grounds. Unhewn stone slabs which were laid about the grave at the Council House Grounds were once the rude headstones that marked the graves in the Seneca burial ground on the Gardeau Reservation. The burial ground had been desecrated and the stones used for building a road culvert during the relocation of Smoky Hollow road by the Town of Castile after Mary Jemison's departure from Gardeau Flats. From this they were rescued by Letchworth and Dr. Shongo in 1879 and brought to the Council House Grounds for preservation. Her daughter Nancy's cabin was brought to the Council Grounds in 1880 to prevent its destruction. In his last public appearance on September 19, 1910, Letchworth attended the dedication of the bronze statue in Mary Jemison's likeness by renowned sculptor Henry Kirke Bush-Brown which he had placed atop the marble pedestal at her grave.

The legend of Mary Jemison is part of western New York state history and lore; it has been chronicled in books and publications across the country since Seaver's publication of *The Life of Mary Jemison* in 1824. Retaining its popularity, the 25th edition of *The Life of Mary Jemison* is still in print, as are numerous reprints of earlier editions, including the 1824 edition. Thus, the written legacy of this astonishing woman is unusually complete and accessible.

The physical legacy of Mary Jemison is, however, more limited and lies solely within the boundaries of Letchworth State Park. That legacy consists of the abandoned site of her homestead at Gardeau Flats, her grave on the Council House Grounds, and the log cabin of her daughter Nancy Jemison Green, also sited on the Council House Grounds. These physical remainders were assembled here in memorial by William P. Letchworth within fifty years of the death of Mary Jemison.

Noted Iroquois historian George H.J. Abrams comments in the foreword to the 1990 reprint of the 1824 edition of *The Life of Mary Jemison* that Mary Jemison was a contemporary of several famous Iroquois of the period. The famed Cornplanter, Handsome Lake, Joseph Brant, Governor Blacksnake, and Red Jacket were well known to her as were many other white captives (of which she is the most renowned) such as Horatio Jones, Moses Van Campen, and Peter Crouse. Mary Jemison emerges as one of the few females to gain prominence and recognition in the history of the Seneca. Indeed, Mary Jemison is among the most famous of all female captives, and is certainly the best known of any of the Seneca captives, who numbered in the hundreds. Her story has captured the attention of Indian and non-Indian alike, giving rise to outdoor drama and novels about her life. With the conclusion of peace and the beginning of a series of land cessions by the Seneca, the Reservation period began. The 1797 land grant to Mary Jemison, Gardeau Reservation, was where she gained distinction in Seneca history by becoming the only woman signatory to an Iroquois treaty. Mary Jemison's importance in the history of the Seneca derives from her having been an observer and later chronicler of a critical period for the Iroquois. Her observations as recorded by Dr. James Seaver offer a unique opportunity to learn about what Seneca life was like at the time. Seaver's efforts have left us not only with a unique and valuable record of an important period of Iroquois history but his work also stands among the best accounts and is a major contribution to the literature of Indian captives.

The Caneadea Council House[10]

By the late nineteenth century there were few traces of the Native American presence in the Genesee Valley. Most early villages had been destroyed during Sullivan's raids, and many settlement-era buildings had been torn down by later European-American settlers.[11] The settlement at Caneadea was well removed from the focal Seneca settlement area and was literally the western outpost of the Seneca. It was considered so remote during the Revolution that American forces of the Clinton-Sullivan campaign in 1779 did not trek to Caneadea to burn and destroy the settlement, even though the Americans knew of its existence. With the peace that ended the American Revolution, most of the vast lands west of the Genesee River were to remain in the possession of the Seneca. The Seneca village at Caneadea was one of several that remained occupied as an important trade and meeting place between the Seneca and the white man. The British were still in control of Fort Niagara and they maintained continued interaction with the Seneca. The Treaty of Big Tree between the Seneca and the United States, signed in 1797 near Geneseo, opened up the lands west of the Genesee River to settlement. As part of the treaty, twelve scattered Indian reservations were set aside to remain in Seneca ownership. Six of those reservations were located on the Genesee River. Caneadea became one of these reservations. It was sixteen miles square and located near the present day village of Houghton, in Allegany County. This is approximately fourteen miles south of the present day park boundaries.

The name Caneadea is a corruption of the Seneca name meaning "Where the heavens rest upon the earth."[12] The village had been an important meeting place and stopping-off point on the vital north-south trail between the Genesee Valley and the Ohio Valley. The Council House at Caneadea continued to play a focal role in Seneca councils and meetings with the white man during this period. In addition, significant Seneca long house calendar events, councils, and ceremonies were held there throughout the period of the Caneadea Council House. During the first years of the reservation period, Caneadea Reservation was important for the same reasons. However, after the Treaty of Big Tree in 1797, the areas of western New York quickly became politically and economically tied to the east, and the importance of the former north-south trail diminished.

Caneadea came to be the capital village of the Seneca, the official Western Door of the Six Nations, and its Council House was unsurpassed in importance by the late eighteenth century. Caneadea's chiefship was associated with the Snipe Clan, traditionally one of the leading clans of the western group of the Seneca. The exact construction date for the Caneadea Council House is unknown. The building was certainly in use by 1779

[10] Adapted from Crawford & Stearns, *Historic Structure Report: Caneadea Council House, Letchworth State Park, Castile, New York*, (Syracuse, NY: August 1995).

[11] One of the exceptions was the "BuffaloTom" Jemison Cabin. Thomas Jemison, a.k.a. "Buffalo Tom," was the grandson of Mary Jemison. He lived at the Squawkie Hill Reservation all of his adult life. His house stood on its original location until 1969, when the current landowners asked the Park if they wanted the building and would move it to the Council Grounds. The park agreed, dismantled the house, and brought it to the park. Due to money shortages, the timbers were not reassembled in a timely manner, and they were left to rot. Today the remaining structural pieces are stored at the Labor Center-Administration Area.

[12] Crawford & Stearns, Historic Structures Report, Caneadea Council House, p 11.

and may have been built as early as the 1750s. Mary Jemison mentions staying in the Council House during her journey from the Ohio Valley, but whether it was the same building is not verifiable. There are no archaeological remains at Caneadea, as the original site of the building has since been eroded away and fallen into the Genesee River gorge. Historical documentation of the Council House begins with the Revolutionary War period, when it was the site of running the gauntlet by Moses Van Campen (1781) and Horatio Jones (1783),[13] and when it was the base for Tory raiders leading Tory-Indian war parties against frontier settlement during the Revolutionary War. It was a public structure, one built for service to the whole community. There was a linking function associated with the Council House and its various roles; it was both the goal and the neutral, safe-haven in the gauntlet; it was the place where adoptions were announced; it mediated worship and communication- from its high bluff above the Genesee River- between the Creator and His people; it was the locale of the celebration of renewal at year change; it was the place where the representatives of clans, nations, and races met to debate and determine their future.

By the 1820s, the Seneca saw their lands and way of life in most of the region as irreversibly lost as the pressures from the whites to sell became insurmountable. The Seneca sachems decided, at council, to sell off most of their Reservation land entitlements and relocate their people to the three larger Reservations, Tonawanda, Buffalo Creek, and Cattaragus, all located on the Niagara frontier. The Caneadea Reservation was sold in 1826 for $48,216 to land speculators Robert Troup, Thomas Ogden, and B.W. Rogers.

The land upon which the Council House stood was sold to Joel Seaton in 1828. He moved the building away from the edge of the river and altered the building for his own use as a residence. Seaton later constructed a new home for his family and turned the former Council House into a barn. The Seaton family owned the structure until 1871. Plans were made by the family to demolish the building, as it was now in ruins.

Local historian and surveyor John S. Minard was very concerned about the fate of this building. He knew its origins and did not want it to be torn down. While he did not have the resources to preserve it himself, he contacted William Letchworth, whose interest in Seneca history was well known. Minard asked him to come and view the building, which led to its purchase by Letchworth on October 5, 1871. Letchworth's actions to save the Caneadea Council House were quite unique for the period. Historic preservation as it is now known was not practiced; groups such as the Society for the Preservation of New England Antiquities (SPNEA), the American Scenic and Historic Preservation Society(ASHPS), and the future leader in preservation, the federal government, were either not formed or were not yet interested in the preservation of the nation's built heritage. In addition, most buildings that were being saved by private individuals in this period were representations of famous American patriots or examples of high style architecture. Letchworth's efforts to save a vernacular building associated with Native Americans was quite unusual in the late nineteenth century.

[13]The gauntlet was a trial for white captives to see if they would be accepted as members of the tribe. The captive was forced to run between rows of Indians wielding rocks, tomahawks, and spears. The Council House was at the end of the pathway, and was the safe house for the triumphant participant.

After acquiring the building Letchworth hired John Shanks, a local Seneca who had lived at Caneadea as a boy and remembered the Council House on its original site, to restore it on a new site at Glen Iris.[14] The move from Seaton's land to Letchworth's was described by Henry Howland in his 1907 *Guide to the Genesee Valley Museum*: [15]

> During the fall of 1871 [sic] set about removing it to the elevated tract of land set apart for it above Glen Iris. A considerable work force of workmen, with a competent foreman, was employed for the purpose of the removal. Preparatory to doing this, each log and piece of woodwork was so marked that it could be adjusted to its proper place when the building should be reconstructed. It was then drawn by teams to a flat canal boat, or scow, on the Genesee Valley Canal, and was then towed to a point on the Genesee Valley Canal where it was unloaded and carefully guarded until the Genesee River was frozen over, when it was transported to its present site. It was set up the following spring. The rustic benches still within the building (in 1907) were placed there by John Shanks, with another Indian assisting him, who obtained the material used from the surrounding woods. Under Mr. Shank's instructions, the roof shakes and withes was [sic] restored as in olden times. The stone back of the fireplace in the westerly end of the building was constructed when the building was erected here, in order to fill the opening made for a similar fireplace by Joel Seaton, who occupied it with a large family for many years after the Indians had left.

While the building was being re-constructed, Letchworth decided that it would be appropriate to have a solemn dedication ceremony. This ceremony would take the form of a Council Fire, similar to those held in the building by the Iroquois for many years. Letchworth wanted the council fire to be symbolic as a rededication, a celebration of the Iroquois people, and a reunion of the Mohawk and Seneca tribes. The two groups had cut off relations after the Revolutionary War, when the Seneca stayed with the Americans and the Mohawk left New York and moved to Canada with their British allies. During the War of 1812 the Mohawk fought on the side of the British, while the Seneca stood with the Americans. This further exacerbated the relationship between the two groups.

The Last Council Fire on the Genesee took place on October 1, 1872, at the Caneadea Council House on the Glen Iris grounds.[16] The event was recorded by Henry Howland, a local writer and friend of William Letchworth:[17]

---

[14] John Shanks was also the son of Chief Shongo and the grandson of Mary Jemison.

[15] Crawford & Stearns, Historic Structure Report, Caneadea Council House, p 74.

[16] While this was the last council fire at the Caneadea Council House, council fires are still held on a regular basis within the Seneca nation and between the different groups of Iroquois.

[17] Henry R. Howland, *The Caneadea Council House and its Last Council Fire*, pp 15-33.

...all climbed the hill to the spot where the ancient Council House stood with open doors to receive them. They were the lookers-on who found their places at one end of the council hall where rustic seats awaited them, save that in a suitable and more dignified chair was seated a former President of the Republic, Hon. Millard Fillmore of Buffalo, whose gracious and kindly presence-that of a snowy-haired gentleman of the old school- honored the occasion.

The holders of the council were "robed and ready." Upon the clay floor in the center of the building burned the bright council fire, and as the blue smoke curled upward it found its way through the opening in the roof to mingle with the haze of the October day.

Upon low benches around the fire sat the red-skinned children of the Ho-de-no-sau-nee who had gathered from the Cattaraugus and the Allegany and from the Grand River in Canada as well; for on that day, for the first time in more than seventy years, the Mohawks sat in council with the Senecas. They were for the most part clad in such costumes as their fathers wore in the olden days, and many of the buckskin garments, bright sashes and great necklaces of silver and bone and beads, were heirlooms of the past, as were the ancient tomahawk pipes which were gravely smoked while their owners sat in rapt and decorous attention as one after another of their orators addressed them. No sight could be more picturesque than was that combination of bright colors and nodding plumes, the drifting smoke of the council fire, and, most of all, the strong faces of the score or more of councillors, the appointed representatives of their people, to speak for them that day.

. . .one of their number arose and following the ceremonial method of the ancient custom, announced in formal words, and in the Seneca tongue, that the council fire had been lighted and that the ears of those who were convened in council now opened to listen to what might be said to them. Resuming his seat, there was a moment of quiet waiting, as if in expectation, and then the opening speech was made by Nicholson H. Parker, "Ga-yeh-twa-geh," a grand-nephew of Red Jacket and a brother of General Ely S. Parker, who served with distinction upon General Grant's staff during the Civil War.

'Brothers: We are holding council, perhaps for the last time, in Gen-nis-he-o. This beautiful territory was once our own. The bones of our fathers are strewn thickly under its sod. But all this land has gone from their grasp forever. The fate and the sorrows of my people should force a sigh from the stoutest heart.

Brothers: We came here to perform a ceremony, but I cannot make it such. My heart says that this is not a play or a pageant. It is solemn reality to me, and not a mockery of days that are past and can never return. Neh-hoh- this is all.'

Most picturesque of all who lingered around the dying council fire was the figure of old Solomon O'Bail, "Ho-way-no-ah", the grandson of the wisest of Seneca chiefs, John O'Bail, "Ga-yant-

hwah-geh," better known as "Cornplanter." Rising gravely in his place he said:

'Brothers: It is true, as has been said by the speakers who proceded me, that our fathers formed and established a mighty nation. The confederacy of the Iroquois was a power felt in the remotest regions of this continent before the advent of the pale-face, and long before the white men came and began to grow numerous and powerful, the friendship of the Iroquois was courted as Dutch and English and French struggled for the contest. They poured out their blood like water for the English, and the French were driven from this great island. Our fathers loved their nation and were proud of its renown. But both have passed away forever. . . .
Brothers: When the War of Revolution was ended, our Great Father, General Washington, said he would forget that he had been enemies, and would allow us to repossess the country we had so long called our own. Our brothers, the Mohawks chose, however, to cast their lot with the British, and follow the flag of that people to the Grand River in Canada. . . . In the last war with England the Mohawks met us as foes on the warpath. For seventy-five years their place has been vacant at our council fires. . . . We are now poor and weak. There are none who fear us or court our influence. We are reduced to a handful, and have scarce a place to spread our blankets in the vast territory owned by our fathers. But in our poverty and desolation our long estranged brothers, the Mohawks, have come back to us. The vacant seats are filled again, although the council fire of our nation is little more than a heap of ashes. Let us stir its dying embers, that by their light, we may see the faces of our brothers once more.

Brothers: My heart is gladdened by seeing a grandson of that great chief Thay-en-dan-ega-ga-onh (Captain Brant) at our council-fire. His grandfather often met our fathers in council when the Six Nations were one people and were happy and strong. In grateful remembrance of that nation and that great warrior, and in token of buried enmity, I will extend my hand to our Mohawk brother. May he feel that he is our brother, and that we are brethren.'

With visible emotion Colonel Kerr [of the Mohawk] arose and warmly grasped the outstretched palm. 'My brother,' said he, 'I am glad to take your hand once more held out in the clasp of friendship; the Senecas and the Mohawk now are both my people.'

. . .there was a surprise for all who were present, as one of the pale-faced guests quickly arose, and stepping to the charmed circle of red-skinned orators, spoke to them in their own tongue. It was the tall figure of Orlando Allen of Buffalo. . . . As a boy of sixteen years he had come to Buffalo to live with Dr. Cyrenius Chapin, while it was still a rude hamlet, encircled with forests, which were the hunting grounds of the Senecas, who were then still living on the Buffalo Creek and its tributary streams. He addressed the council in Seneca as follows:

. . .'Brothers: This valley of the Genesee where your fathers once ruled is filled with remembrances of old days and we are gathered here to revive those memories. This is of great importance, as is the preservation of this old council house which your fathers parted with when

they gave up their lands, but which has once more been restored.'

Attending the council fire were representatives of the Seneca and Mohawk tribes. The Mohawk sent Col. W.J. Simcoe Kerr, grandson of Captain Brant, a famous Mohawk chief and grandson of Sir William Johnson, the Indian agent for the British government. He was accompanied by his sister, Mrs. Kate Osborne. The Seneca were represented by two grandsons of Mary Jemison, Dr. James Shongo and Thomas Jemison, by the grandson and grand-nephew of Red Jacket, John Jacket and Nicholson Parker, George Jones, the grandson of Tommy Jemmy, two grandsons of Tall Chief, William and Jesse Tallchief, William Blacksnake, the grandson of Governor Blacksnake, Solomon O'Bail, the grandson of Cornplanter, and Isaac Johnny John, John Kennedy, John Shanks, Maris B. Pierce, Thomas and Polly Doxtater, Julia Jacket, John Wilson, John Spruce, John Harris, and William Alleck, all born on one of the Genesee reservations.

After the ceremony was completed and everyone had gone down to Letchworth's Homestead, the Indians approached Letchworth about becoming a brother of their own blood. This was the highest tribute they could bestow on this man that they had come to respect for his care of their Council House. He accepted the honor, and was given the name Hai-wa-ye-is-tah, or "the man who always does the right thing."[18] Letchworth would go on to collect Indian artifacts to be displayed on the Council House Grounds, to move the Nancy Jemison cottage to the grounds, and assist in the re-burial of Red Jacket and five other Seneca chiefs whose graves were being damaged by the expansion of the city of Buffalo. His dedication to the heritage of the Seneca earned him his name throughout his entire lifetime.

Settlement Era (ca. 1792-late 1850s)

The end of the Revolutionary War meant a change in the development of the Genesee River Gorge. General Sullivan's campaign against the Seneca brought European Americans into the valley in large numbers for the first time. His soldiers saw the bounty of the land and coveted what had long been Seneca territory. Unfortunately for the Seneca, they had sided with the British during the war and therefore could expect some form of retribution from the new American government. This came in the form of land confiscation throughout the Genesee River Valley. All of the Iroquois land from Seneca Lake to the present western New York state border was considered spoils of war.

Due to conflicting claims, the land was given to Massachusetts to sell, although it was still under the political control of New York. All of the land east and west of the Genesee River was sold to Oliver Phelps and Nathaniel Gorham in 1788 for approximately three cents an acre, with the agreement that the total sale price would be paid to Massachusetts in three years. The Seneca agreed to give up their land east of the river and approximately 200,000 acres west of the Genesee. A formal agreement was not reached on the balance of the land on the west side of the river at this time. Phelps and Gorham attempted to sell the land, but were unable to raise the full amount owed. In 1790 the land was returned to Massachusetts. Robert Morris bought the eastern portion of the Phelps and Gorham Tract in 1791; however, he was forced to sell most of the land to Sir William

[18]Ibid., pp 35-36.

Pultney in 1792. This allowed Morris to purchase the land on the west side of the river, which had been sold back to Massachusetts by Phelps and Gorham. Most of this land was sold to Dutch land speculators and became known as the Holland Purchase. Morris was not given the full price for the land, since some of the property was still in the hands of the Seneca.

The Senecas' claims to the southern Genesee River Valley had not been settled after the Revolution. Morris met with important members of the tribe at Big Tree, where a treaty was negotiated. The Senecas were relegated to reservations consisting of less than 200,000 acres of land. Mary Jemison was given 17,000 acres along both sides of the Genesee known as the Gardeau Reservation for her own use. The rest of the land west of the river was now open for settlement by European Americans. Part of this newly opened area became known as the Cotringer Tract, which constituted much of the land now included in Letchworth State Park. Named for Gerit Cotringer[19], the 50,000 acre parcel was sold to him by Robert Morris. Elisha Johnson was the first surveyor of this land in 1807. He later became mayor of Rochester and a builder of the Genesee Valley Canal.

One of the land agents for the Cotringer Tract was George Williams, who became a well-known citizen of the Genesee Valley. Williams had come to the region with his father at the beginning of the century. He attended Yale College and fought in the War of 1812. From that time on he was known as Colonel Williams. At Yale he studied law, which helped him in his land sales for John Hornby, a representative of the Cotringer investors. He bought his own land on both sides of the Genesee River around what became the village of Portage. He owned land near all three falls and at Big Bend, north of the Lower Falls, much of which he later sold to William Letchworth. He was elected to the New York State Legislature in 1826, but after switching parties during his term he was not re-elected. He was very active in trying to attract settlers and industry to the area, in part by promoting new transportation methods such as the Genesee River Canal and the Erie Railroad.

Settlement patterns were a result of the topography of the Genesee River Gorge. Much of the river could not be crossed due to the deep canyon and the power of the river. Crossings could be attempted at a few places, and when European Americans came to the valley they tended to either establish settlements near the river fords or individual homes near the falls where the force of the river could drive their sawmills. The best places to ford the river were near the Gardeau Flats where the villages of St. Helena and Gibsonville were established, and just below the Lower Falls at what is known as Lee's Landing. While a town was never established at Lee's Landing, it was the location for the shipment of lumber from the local mills to be rafted down river to Rochester. Two sawmills were built here, one on each side of the river. A bridge was located here during the middle part of the nineteenth century, which was known as Rogers' Bridge. The land on the west side of the river was called Rogers' farm until 1878, when it was sold to Harvey Lee and acquired the name Lee's Landing.

Most of the settlers in the Genesee Valley came to farm the land, often bringing their families with them from communities across New England. They had been forced to move west due to land shortages in the more

[19]Sources from the period spell the name both Cottringer and Cotringer

established areas along the eastern seaboard, and were lured to the Genesee Valley by good land prices and the rich soil. However, the land they purchased along the Genesee River had to be cleared of heavy tree growth before it could be planted. The removal of the trees from the land offered settlers the opportunity to raise funds through the sale of the lumber. The burnt remains of the smaller trees, called potash, were also valuable. Used in soapmaking, bleaching, calico printing, and as a fertilizer, potash was used by both farming families and urban dwellers. These products could be sent north towards Rochester, along the river from places such as Lee's Landing. During the early years of settlement, small sawmills were operating all up and down the Genesee River. The first in the Gorge area was established near the Upper Falls in 1812, and was still in place when the first railroad bridge was erected in 1852. The mills would ship their loads down to Lee's Landing to be stored until spring, when the river was running high. These loads would then float down river to Rochester. The journey down river took three to four days from Mt. Morris, at the north end of today's park, to the city of Rochester. Later lumber was sent to Rochester on the Genesee Valley Canal after it was opened. By that time, however, the lumber industry was beginning to wind down in this area, and by the 1850s most of the mills had fallen into decay from disuse. Most of the trees had been removed from the slopes and flat land around the Falls, providing the settlers with rich farmland.

Once the land was cleared it could be planted with crops. The earliest settlers were subsistence farmers, growing corn and wheat and raising livestock for their own uses. By the mid-nineteenth century the residents of the Genesee Valley could ship their products to market via both the Genesee Valley Canal and the Erie Railroad. Wheat continued to be a big product on the east side of the river, where the land was more fertile and rolling. The rocky, poorer soil of the west side of the river forced farmers to move toward animal husbandry, particularly raising dairy cattle, to make a living. The milk, cream, and butter could then be shipped along the canals to Buffalo, Rochester, and points beyond. Farmers were becoming more prosperous, and raising enough food for themselves was no longer a concern. By the end of the century farms had diversified into such far-flung agricultural pursuits as breeding draft and carriage horses, growing tobacco, hops, and hay, and harvesting maple sugar for syrup.

Among the earliest residents of the gorge region were Reuben and Perry Jones. Like many of the early residents of the area. They settled south of the Big Bend area near the Lower Falls on the west side of the river around 1816-1817 and established a sawmill. Eventually they both married and built larger wood frame homes. Reuben Jones's home, known as Chestnut Lawn Farm, stood on Letchworth's land until the 1930s.[20] Letchworth used the farm as a dairy facility. Perry Jones's farm, called Prospect Home, was later used as a retreat for Buffalo orphans who were brought to the farm for a couple of weeks at a time by Letchworth and the Wyoming Benevolent Institute. Prospect Home still stands today in its original location, although it has been altered since Perry Jones built it.[21]

[20] Chestnut Lawn was located near the Lower Falls. It was razed in the 1930s by the Genesee State Park Region. Today the land is used as the Group Camping Area. It was a two-and-one-half-story vernacular Greek Revival house with a gable roof and a pedimented entrance.

[21] The dates of construction for both Chestnut Lawn Farm and Prospect Home are unknown due to extensive alterations done by Letchworth in the 1870s. It is likely that the houses were built ca. 1820s-40s.

One of the first men to settle the Middle Falls[22] area was Alvah Palmer, who arrived in 1821. He knew there would be a market for the abundant timberland of the valley, so he established a sawmill near the falls on the west side of the river which was in operation by 1824. His mill was later carried away by flood waters, so he rebuilt it bigger and better, this time including a planing mill, gang saws, and a sash and blind factory. He also built a small house near the Middle Falls, that would later become a wing of William Letchworth's beloved Homestead. Palmer sold the land to Michael Smith in 1832, who expanded the house and bought more land for his estate. In 1858 the planing mill and sash and blind factory burned down, and Michael Smith was heavily in debt. He sold the land to William Letchworth in 1859.

In 1840 a master plan was developed for a subdivision of land around the Middle Falls on the west side of the river. A map of the plan, laid out by Olcott and Smith, developers from Albany, is on file at Letchworth State Park. It shows plans for mills, raceways, streets, numerous buildings, a bridge, a power dam, and projected building sites. A site titled "Palmer's House" shows the location of what would later become William Letchworth's house at the Middle Falls. The village of Portage Falls was never incorporated, and the plan was defunct by the 1850s when the Genesee Valley Canal was completed through the area.

Transportation Development[23]

Navigation on the Genesee River had always been hampered by the waterfalls at both the Portage gorge and at the city of Rochester. Barges and later steamboats were unable to fully take advantage of the south-north waterway, except for a short distance between the town of Mt. Morris and the rapids and falls near Rochester. Shallow draft Durham boats were best suited to the river due to its lack of depth, although larger barges could be pulled by teams of horses. Shortly after the Erie Canal linked Lake Erie with the waters of the Hudson River and the Atlantic Ocean in 1825, the men who had their lives and fortunes invested in the Genesee Valley pushed for a lateral canal, a man-made water route, which would overcome the constant problems and hazards inherent to the natural waterway. If such a canal were built from the Erie Canal to the Allegany River, it would mean that Genesee Valley lumber, wheat, and other crops could be sent to such markets as New York City, Buffalo, and New Orleans at very little overhead.

The idea was to follow the general windings of the Genesee and its tributaries as far south as possible before swinging southwest to meet the Allegany. A private survey undertaken in 1826 by civil engineer William Jones, who had been hired to assess the feasibility of the canal, disclosed that such a route was indeed feasible and the task relatively easy- except in one area- the rugged terrain of the Portage Falls area.

[22] In this text the Upper, Middle, and Lower Falls will be referred to in the plural, as they are described by the Genesee State Park Region today. Technically, however, the Upper and Middle Falls are singular, as they only fall once each, not multiple times on the way down. The Lower Falls have multiple drops and are correctly called falls. William Letchworth was very precise about calling them the technically correct name, but for the sake of consistency they will all be referred to as falls.

[23] Adapted in part from Thomas Cook's *A History of Letchworth State Park*, (1978).

New York State was impressed with the survey and authorized an official survey in 1834 which, in turn, led to the passage of an act on May 6, 1836, which, "provided for the construction of a navigable canal from the Erie Canal in the city of Rochester, through the Genesee Valley, to a point at or near Mt. Morris, and thence by the most eligible route to the Allegany River at or near Olean. . . ."[24] Unfortunately there wasn't much choice in selecting an "eligible route" -the main obstacle in their path was still the Portage Falls area.

The first few years saw the construction of the Genesee Valley Canal fly forward until fifty-one miles of waterway from Rochester to Dansville had been completed. However, since the work had been let out in sections by the state to private contractors, work had already been started on the sections that lay between the villages of Nunda and Portageville, which had the distinction of being, in the words of the Canal Commission, "the most difficult and expensive portions of the canal. . . ."[25] Since the original plans for that length included a multitude of locks, a deep cut, a tunnel, and an aqueduct, it did not take long for the optimism of the early years to be dashed at Portage.

The task bordered on the impossible. First, seventeen massive locks were constructed in a stretch of under three miles in order to lift the canal out of the Keshequa Valley onto the summit of Portage Hill (near present-day Oakland). Then, to avoid the construction of more locks, a cut was made in the hillside, the tons of earth moved without the aid of heavy machinery. The result was a manmade ravine nearly two miles long and over fifty feet deep. Known as the "Deep Cut" it can still be seen today within the park, a reminder of the confidence and energy of nineteenth-century engineering.

By far the most difficult task was near the Middle Falls on the east side of the river, where Elisha Johnson was contracted to build a tunnel through the ridge first described in the original survey as being the most difficult obstacle on the canal's route. At first, work on the tunnel went smoothly with much of the main tunnel and a lateral tunnel dug out of the ridge. Then a public work stoppage was called in 1842, which left the tunnel idle for six years. When the work was resumed in 1848 it became evident to Johnson and others that the ridge was composed of sliding rock and that the tunnel was not only impractical to build, but also dangerous. Johnson was considered a brilliant engineer, but also scheming, completely without conscience, and irascible. A former mayor of Rochester, he was allegedly conning the government out of thousands of dollars. When the canal commission investigated suggestions of fraud, Johnson was one of the primary suspects. Colonel George Williams said that Johnson was bankrupt when he started the project, but by the time the tunnel was given up he had gained at least fifty to sixty thousand dollars. Johnson confirmed the suspicions by quickly moving south to his new home called "the Mansion" in east Tennessee.[26]

---

[24]Ibid., p. 22.

[25]Ibid., p. 23.

[26]During his time at the falls, Johnson built and lived in his house, which he called Hornby Lodge, completed in 1840. Built on the brink of the gorge on the east side, the building was considered something of a curiosity. The bottom floor was octagonal, the second floor was square, with four stories in all. The floors were joined by a winding staircase attached to a live oak tree growing in the

After a huge expenditure of time and money the tunnel was abandoned and the ridge itself blown away so that the canal could be pinned to the very edge of the cliff, hundreds of feet above the river. But even then the problems didn't end, for just above the Middle Falls a slide area developed that forced several additional aqueducts to be built along with the massive one at Portageville, which carried the canal across the river in the south end of today's park. Remains of the Portageville aqueduct are visible in the river at the north side of the village of Portageville. These consist of two piers built into the north and south banks of the Genesee and two freestanding piers in the middle of the river.

Although the construction of the Genesee Valley Canal would not be finished until 1863 when the final connection was made with the Allegany River, the line was completed to Olean on November 6, 1856. The original proposal had been for a total cost of $2,002,285. The actual cost at contract prices was $4,900,122, which rose to over six million when additional costs and improvements were added in. It was an expensive, time consuming battle of dubious honor- the canal would never, even in its best years, break even. Some historians guess that the canal lost one million dollars annually, although it did contribute to the overall success of the Erie Canal. The Genesee Valley Canal was officially closed by law in 1878, much to the disappointment of many who lived in the Genesee Valley.

One of the main reasons why the canal never reached its full potential was the advent of the railroad. As with the canal, the Portage Falls area found itself in the middle of the planning and construction, since its location placed it between the two thriving communities of Hornellsville to the southeast and Attica to the northwest on the line between New York City and Buffalo. Plans were filed for the Attica and Hornellsville Railroad on February 2, 1851, and by July of the next year the line was opened for traffic as part of the Erie Railroad except for a short 800 foot section across the Genesee River gorge.

Since the original survey had called for a bridge across the gorge of the Genesee River near Portage, a spot was chosen just above the Upper Falls. Designed and constructed by Silas Seymour, the wooden high bridge that was subsequently built there became an engineering wonder of the world. It contained 1,602,000 feet of timber; the product of 205 acres of heavily timbered land, 108,862 pounds of iron, and was completed August 14, 1852, at the cost of $140,000.[27] A handbill distributed on one of the frequent sight-seeing trains was bold enough to announce that "Passengers should not fail to see the longest and highest wooden bridge in the United States, if not in the world, and one of the grandest views on the Western Continent!"[28] One important passenger on the way from New York City to Buffalo was curious about the structure, and like many other passengers, he disembarked and walked onto the bridge. William Pryor Letchworth later recounted his experience, noting:

middle. It was furnished with stuffed skins along with birds and squirrels mounted on projecting poles. The house was so severely damaged by falling fragments from the blasting of the cliff that it had to be razed in 1849. Hornby Lodge is well-documented by sketches and a painting by noted artist Thomas Cole.

[27] The timber from the bridge came from the land near the bridge site, and was responsible for much of the clear cutting seen by Letchworth when he first came to the gorge.

[28] Cook, p. 29.

> I perceived the valley's capabilities and determined that, if I could get a foothold within its borders, my lot should be cast here. The Glen at that time presented a very different appearance from what it does at present. There were unsightly objects in the form of ruinous buildings, wrecks of abandoned enterprises and bare points that had been stripped of their foliage and were looking forlorn enough. In every direction the eye encountered something that shocked the esthetic sense. But I saw that nature was endeavoring to recover herself and I was so charmed with the infinite variety of delicate beauties which nature had brought so close together- which seemed to invite me to a study of her yet uncomprehended attractions, just as the white hand of your fair friend holds out to you a charming book, saying, "Read."[29]

Letchworth was in awe of the beauty of the spot, but also dismayed by the devastation caused by the lumber industry. This led to his purchase of the lands around the falls and the eventual gift of the Glen Iris estate to the state of New York to prevent such damage from ever happening again.

The High Bridge was undoubtedly a sight to behold. The eight hundred-foot long structure stood two hundred and thirty-four feet above the river on thirteen massive piers. People came from all over the state and beyond to view the beauty of the falls and marvel at the impressive engineering structure. The popularity of the Genesee Gorge soon led to its development as a tourist destination with two hotels near the High Bridge Station on the east side of the river near the railroad tracks and the gorge.[30] But the bridge's glory days did not last long, for after its dedication in August of 1852 the bridge stood for only twenty-three years before it was completely destroyed in a mysterious fire on a windy May night in 1875. Letchworth was a witness to the fire and recorded his view for the *Buffalo Courier*:

> The watchman, Pardon Earl, states that he was at the east end of the bridge when the train passed, that he crossed the bridge to the west end immediately thereafter, and returned near to the east end, when looking west, he saw a small blaze in the decking of the bridge, not far from the west end. He returned to it and endeavoring to stamp it out with his feet broke a hole through the deck of the bridge. The floor broke through so easily that he concluded the fire must have come from under the deck or uppermost covering of the bridge. . . . I was aroused from sleep at ten minutes to four o'clock; and in a few minutes was standing upon the lawn of Glen Iris from which point every portion of the bridge was visible, as well as the Upper Falls, river, and Middle Falls. The spectacle presented at precisely four o'clock was fearfully grand, every timber in the bridge seemed then to be ignited, and an open network of the fire was stretched across the upper end of

[29] Speech given at a dinner for journalists at the Cascade House, July 17, 1875, reprinted in the *Buffalo Courier. Genesee Echoes*, p. 95.

[30] The two hotels were called the Cascade House (built ca. 1853) and the Emerald House (built ca. 1867). The area around the east side of the bridge was known as the hamlet of Portage Bridge, and in 1881 was made up of a "few scattering homes, the depot, and two hotels." *History of Livingston County, New York.* Syracuse, NY: D Mason and Company, 1881.)

> the valley. . . . The water in the river was glistening with the bright glare thrown upon it, and the whole valley of Glen Iris was illuminated in tragic splendor. . . . At fifteen minutes past four the superstructure of the west end of the bridge sank downward and the depression rolled throughout its length to the east end like the sinking of an ocean wave. . . . Burning fragments of the bridge fell all about the upper end of the valley, covering hillsides apparently with steady burning signals. . . . The wind partially lifting the curtain of smoke revealed a blazing tower dazzling with fire. This was the central pier of the bridge, the top still wreathed in smoke...a little later still. . . the tower staggers, and another roar and crash, and the tower sinks down into the burning mass among the stone piers, and the Portage bridge is a thing of the past . . . Daylight revealed an inky basin at the base of the Upper Falls which had been discolored by the coals. The fall itself was amber tinted, and the river below flowed dark from discoloration of the burning masses that it had swept down. The chasm after the fire seems broader and deeper than before and, had we never seen the bridge, what now remains would appear an incomprehensible ruin.[31]

The iron bridge that replaced it three months later still stands high above the falls. It was erected in only three months, primarily because the framework had already been constructed and was laying on a dock, ready to be shipped to Africa. It was easily diverted to Portage, and the contract for the work was given out within two days of the fire. Many people thought that the fire had been "suspicious," because it was known that the railroad wanted a newer bridge, the supplies were sitting on the dock, and it appeared to the bridge watchman that the fire had started from underneath the track. Nothing could be proved, however, and the new bridge was quickly erected.

The Watson Manufacturing Company of Paterson, New Jersey, constructed the new high bridge. George S. Morison, one of the leading bridge builders in America during the nineteenth century, was the engineer. Plans were made to replace this bridge in 1902. Instead, in 1903, the bridge was renovated, and the woodwork on top replaced. At the same time the single track was replaced by double tracks. Bridge expert Carl Condit had this to say about the span:

> The thirteen cast and wrought iron spans are composed of Pratt deck trusses with double diagonals in the center panels. What is remarkable about the bridge is the extensive iron trestlework of high bents which takes the place of the conventional piers. The ends of two adjacent spans rest on a single pair of wrought iron columns set side by side, the ends of two adjacent trusses thus falling on one column. Alternate groups of four such columns are laced together by horizontal wrought iron beams and a double set of diagonal rods in each panel formed by the beams. In place of piers, then, the bridge is carried on a series of six four-post bents, or trestles, of extraordinary size. Their unusual width resulted from the fact that the structure was built for two tracks, although only one was laid. Morison's design of the trusses and the bents was based on careful calculations of wind as well as traffic loads. Perhaps the most

[31] Found in Vertical File 7.5, Letchworth State Park collection.

impressive of the facts associated with the Portage bridge is that the whole structure was erected in 82 days, between May 10 and July 31, 1875. It was a powerful demonstration of what a bridge builder could do, and given the unusual height of the structure, it was as significant as great length of span for the advancement of the art.[32]

In 1880 the abandoned Genesee Valley Canal was sold to the Genesee Valley Canal Railroad for $11,400. Local residents, including Letchworth, wanted the railroad to provide transportation of agricultural goods to larger cities. The rail line was constructed along the former canal bed and tow path between 1881 and 1883. The Pennsylvania Railroad bought the line in 1902. This line was not a huge success, however, because it had some of the same problems which plagued the canal during its use. Rock and sand continued to slide at the Portage section and, in the 1950s, the railroad was abandoned. The section within the park is now part of the Genesee Valley Trail on the east side of the river.

Civil War Regiments

The Erie Railroad indirectly played a part in the development of two Union regiments who participated in the Civil War. The presence of the nearby railroad stop at Portage contributed to the development of a training camp for Federal troops not far from the High Bridge. The year 1862 was a difficult one for the Union Army. The Confederates were waging a successful war, and the Union forces had not been prepared for it, either with men or supplies. A presidential Proclamation, dated July 2, 1862, called for 300,000 new recruits for the army. Each state had a quota to meet. New York had to recruit tens of thousands of volunteers within forty days.[33] New York state officials decided to divide the state into sections based on senatorial districts. One such district was made up of Livingston, Allegany, and Wyoming Counties. This district had to create three regiments plus 338 men, or 20 men per town in the area. A regiment was traditionally made up of 1,000 men.

The training ground for these men was hotly debated, but in the end land in the town of Portage was selected since it was near the geographic center of the recruiting district and near the railroad station at Portage. The property was owned by Colonel George Williams, a former land sales agent and investor in the Genesee Valley Canal. His land, located a mile north of the railroad bridge on the east side of the river, was ideal for the 14-acre camp, aptly named Camp Williams for the land's owner. It was also called Camp Portage, the Barracks Grounds and, later, the Parade Grounds, which is still used today. The land was flat enough for military drills and had an ample supply of spring water. Barracks were quickly built and by the middle of August the camp was ready.

The first regiment began training on August 18th, 1862, and was called the 130th New York Volunteer Infantry. Training was completed on September 6th, and soon the 130th was sent down to Virginia with 1,001 men. In 1863 the group was transferred to the cavalry and called the 1st New York Dragoons. It was the only regiment to

[32]Carl Condit. *American Building Art: The Nineteenth Century*, (New York: 1960), pp. 111-112.

[33] The quota number is disputed, it was either 30,000 or 50,000 men within 40 days, or they would be drafted.

carry the "Dragoon" designation because it was a mounted infantry, similar to European units. The regiment fought in the famous battles of the Wilderness and Cold Harbor. They were also present at Appomattox Court House for Lee's surrender. The regiment also had the dubious distinction of being the cavalry unit that lost the most men in a single engagement in the war.[34]

In order to meet the district quota, another regiment was soon formed at Camp Williams. It was named the 136th New York Volunteer Infantry, and trained at Portage from September 26th through October 2nd, 1862. The 136th also headed to Virginia, where the regiment fought at Chancellorsville. The unit fought in 49 engagements in all, including the well-known battle of Gettysburg, the siege of Atlanta, and the Campaign of the Carolinas. The 130th and the 136th regiments were the only units to use Camp Williams, and were the last volunteer regiments from the area.

On January 23, 1863, Colonel Williams announced that he would sell the barracks buildings. The frame buildings at the camp were disassembled and the wood salvaged. All of the lumber was sold, and the Camp Williams land returned to its natural state. The land was later purchased by William Pryor Letchworth from Colonel Williams' son so that he could expand his Glen Iris estate.

After the war, the veterans of the Dragoons and the 136th held their reunions at the Cascade House, located near the High Bridge Station on the east side of the river. This was where the troops had said their farewells to their families before leaving for Virginia and the war. In 1903 a granite obelisk was erected near Portage Station by the 1st New York Dragoons to honor their comrades who died during the war. It weighed 24 tons and was designed by D.W. Harrington of Buffalo. The monument was moved across the river to Letchworth State Park in 1916. Gradually, as the soldiers passed away, the survivors felt that something should be done to commemorate their experiences. They approached the Genesee Park Commission in the early 1930s about preserving the grounds where Camp Williams had been located. This was agreed upon, and gradually the land was once again cleared and improved with roads, shelters, and a marker. The land became know as the "Parade Grounds." It was dedicated as a soldier's shrine in 1933 at the 64th annual reunion of the 1st New York Dragoons.

Early Genesee Valley Communities[35]

One of the earliest communities built along the Genesee River Gorge was Gibsonville, settled in 1792. The village was located north of Mary Jemison's Gardeau Reservation, on the west side of the Genesee River at the outlet of Silver Lake. The first sawmill established at what would become Gibsonville was built in 1792 by Ebenezer Allan, known locally as "Indian Allan." Allan arrived in the area in the 1780s, first living with Mary

[34]The battle of Todd's Tavern, May 7, 1864. Mildred Lee Hills Anderson. *Genesee Echoes*, (Dansville, New York: F.A. Owens Publishing Company, 1956). Historic Highlights of Letchworth State Park, April 1988.

[35] While there were numerous towns and villages along the Genesee River, the villages of Gibsonville and St. Helena are the only two villages within the boundaries of the present day Letchworth State Park.

Jemison and her family and working her land. The first inn was built in the community in 1796. The village of Gibsonville was named for Henry B. Gibson, who owned the land in the early 1800s. The community slowly grew into a thriving village, with a paper mill employing many of the residents. By the 1840s, the village had a general store, schoolhouse, a post office, blacksmith shop, and sixteen houses. It was a shipping point on the river for products to go to the Rochester markets.

The community never recovered from a fire in 1894 that destroyed the Silver Lake Paper Mill. Many people left the community, and only farmers remained. The community tried to continue, but in 1930 the Gibsonville school was closed. In 1933 Gibsonville became the site of one of four Civilian Conservation Corps (CCC) camps at Letchworth State Park. Aside from the work on the park grounds, the CCC enrollees razed all of the buildings remaining in the village. The only building associated with Gibsonville that was spared was the Littledyke House, which is now a caretaker's house inside the park grounds. The building stood outside of the town center and was home to Robert Gibson[36], the last man to leave the dying town.

Another settlement era village was St. Helena. First located just south of the Gardeau Reservation along the Genesee River, St. Helena gained size in 1823 when Mary Jemison sold all but two square miles of her land to Micah Brooks, Jellis Clute, and Henry Gibson. Brooks took the portion east of the river, Clute the northern portion on the west side, and Gibson the southern section on the west side. A surveyor laid out the plans for the village during the early 1800s. The village was to be divided into three sections: residential, business, and manufacturing.

Early on the abundance of timber and water power attracted many settlers to the community, which was on both sides of the Genesee River. Sawmills were built, and the timber was rafted down the river to the markets. A bridge across the river was built in 1835 to connect the main St. Helena settlement on the west side of the river with the scattered farms located on the east side. This was the first of several bridges built at this location.[37] With the completion of the Genesee Valley Canal in 1863 and the railroads in 1852, St. Helena residents were able to take their goods to market easily.

In 1860 the village was quite prosperous. It had a flour mill, two sawmills, a shingle mill, paper mill, two general stores, a hotel, twenty-five houses, and a school with seventy-five students in the winter term. Not long after, however, the timber began to run out, and the saw and shingle mills closed. Many people began to farm the land now that it was cleared. In 1880 the hamlet's population had dropped to between twelve and fifteen houses. By 1885 St. Helena's residents were concerned about a proposed dam on the Genesee River. Two sites were suggested, one in the town of Mt. Morris, the other at Portageville, above the Upper Falls. Either one would be devastating to the people of St. Helena. A dam at Mt. Morris would turn the St. Helena land into a flood plain; one at Portageville would lower the level of the river and dry out the town. By 1920 only a half dozen families were still living in the area. The land was being bought up by utility companies in preparation for the dam. Anyone who wished to remain until the dam was built was allowed to rent back the land. The graves in

[36] Robert Gibson is not related to Henry B. Gibson, the town's namesake.

[37] The last bridge at this site was demolished in 1950.

the St. Helena Cemetery were moved to Grace Cemetery in Castile. The CCC also used St. Helena as a base during their work at Letchworth State Park from 1934 until 1936. By the time the dam was completed in 1952 there were no more residents in this once thriving community.

Another site associated with the settlement period is the pioneer cemetery, located on the west side of the river, north of the Glen Iris Inn. Many of the identified gravestones are from the families such as the Jones', the first to settle there in 1816-1817. Many of the families identified are still living in the area. It is questioned by some as to whether the graves were moved by Letchworth from an area south of the Homestead during his residence at Glen Iris, but the answer is unknown. Ten families have been identified in the cemetery, although there are some unmarked graves. The last burial was in 1915, and at that point the cemetery fell into disrepair. It was refurbished in the late 1950s or early 1960s.

William Pryor Letchworth Era

William Pryor Letchworth was born on May 26, 1823, in Brownsville, New York. He was one of eight children born to Josiah and Ann Letchworth, devout Quakers, who brought him up in a strict but loving environment. William was a dreamer and an idealist, traits he carried throughout his life. As a young boy he was fascinated by tales of elves and fairies, medieval knights, and noble Indians. He felt that to achieve greatness, it would be necessary to run away from home. His father found out about his plans and told him that it was all right for him to leave if he had to, but he shouldn't sneak away, as his family would want to say goodbye before he left. His comments had their intended effect, and William never tried to run away again. His father instilled in him Quaker values of hard work, dedication, and care for the less fortunate. These ideas would be important throughout William's life and direct his future activities.

At the age of 15 he went to work as an apprentice with the firm of Hayden & Holmes, manufacturers and dealers in saddlery hardware in Auburn, NY. He made forty dollars a year plus room and board and managed to save part of his salary. Working hard and learning a great deal about the business was very important to him. He wrote up his own Rules of Conduct, which included, "In business affairs keep in mind that 'procrastination is the thief of time' and that 'time is money,'" "Attempt great things and expect great things," and, "Aim to do all possible good in the world, and so live as to live hereafter and have a name without reproach."[38]

Letchworth worked for Hayden & Holmes for six or seven years, then moved on to another associated saddlery company in New York City during the summer or fall of 1845. As in Auburn, Letchworth worked very hard, to the exclusion of most other activities. His family was concerned about him, and his sister wrote, " I hope thee will form some agreeable acquaintances: but, do not have too many of them; for too much company is of no advantage to a young man."[39] After three years he was offered the chance to become a partner in a hardware

[38]Irene Beale. *William Letchworth, A Man for Others*. (Geneseo, NY: Chestnut Hill Press, 1994), p. 9.

[39]Ibid, p. 16.

firm in Buffalo that was expanding into the saddlery industry. Letchworth accepted and, in 1848, he moved to Buffalo and began his work with Pratt & Letchworth, specialists in saddlery and carriage hardware and trunk trimmings.[40]

As in New York City, Letchworth worked hard in Buffalo with his new company, learning all aspects of the business, to the exclusion of social activities for the first few years. He gradually brought other family members into the business, and they were able to take some responsibilities off his shoulders. During this time he was attempting to discover how to make iron more malleable and easier to work. This process had first been discovered by Henry Bessemer of England, and Letchworth wanted to perfect the technique and bring the knowledge, and potential profits, to Pratt & Letchworth. He gradually became friends with other young men in town, who introduced him to famous figures such as William Seward and Millard Fillmore. In 1856 he fulfilled a long time dream and traveled to Europe, visiting France, Italy, England, Germany, and Switzerland. He was particularly fascinated by the history and architecture of England. While Letchworth was overseas his father, who was a pivotal figure in his life, passed away.

Upon returning to Buffalo, Letchworth began joining social organizations. These groups would play a large role in developing his future activities. One such organization was the Young Men's Association, a literary, cultural, and artistic organization that was founded in 1836 to save the collections of the Buffalo Library and Lyceum. The group sponsored lectures by famous authors such as Tennyson, Hawthorne, Whittier, Thackery, and Mann. Letchworth also became active in the Young Men's Christian Union. From this group a smaller group of friends and followers of literature was founded and called "The Nameless." Founded by writer and poet David Gray, the organization encouraged its members to write and explore their creativity. This group provided an outlet for the creative impulses that had stirred in Letchworth all of his life. He wrote short stories with titles such as the "Burial of a Broken Heart" and "Aston Hall." Both were later published in *The Home Monthly* under the name Saxa Hilda.

Throughout his life, Letchworth was concerned about his "delicate health." He was a small, finely boned man, and often worried about over exerting himself. He wrote to his brother wishing for an iron constitution, so that he could more easily do all of the things he needed to do. Instead, he decided to buy a home in the country where he could relax and care for his health after all of the time he had dedicated to business matters. A friend suggested the Genesee Valley region. On a train trip on the Erie Railroad home to Buffalo from New York City, Letchworth stepped off the train near the wooden high bridge to see the view. What he saw, a beautiful river gorge with waterfalls, inspired him to purchase this land. While he was amazed by the beauty of the spot, he was also appalled by the devastation wreaked by the logging and mills over the past four decades. He was determined to conserve the valley and restore it to its former glory for the enjoyment of people for years to come. The current owner of the land, Michael Smith, was heavily in debt to Theodore Olcott. Letchworth paid Smith one dollar for his land, and Olcott seven thousand dollars for the debts. This purchase in 1859 gave

[40]Pratt & Letchworth Company is still in business in Buffalo today. The foundry for Buffalo Malleable Ironworks/Pratt and Letchworth is located on Tonawanda Street in northwest Buffalo.

Letchworth 190 acres surrounding the Upper and Middle Falls of the Genesee River. He named the area Glen Iris, and this estate became his refuge from the world throughout the rest of his life.[41]

Letchworth's development of the Glen Iris estate was part of a burgeoning national movement to save and enhance rural landscapes in America. Wealthy industrialists across the country were becoming disenchanted with urban life. They felt the need for a retreat from the problems of industrialization, the rise in immigration, and the loss of rural areas to development. Nature had become important once again, and the ideas of great naturalists such as Lancelot "Capability" Brown in Britain and A.J. Downing in America were considered very fashionable. Gone was the trend toward restrained gardens with straight paths and manicured hedges. Emphasis was now placed on developing winding paths, scenic vistas, irregular plantings, and rustic walls and bridges. The Victorian period was in full swing, and with it a trend toward the dramatic and mysterious, known today as the Romantic Movement. A reaction against the restrained classical styles of the eighteenth and early nineteenth centuries, the Romantic Movement could be seen in art, literature, music, architecture, and landscape design. Painters such as Thomas Cole and John Constable, writers like Herman Melville and Charles Dickens, and architects and designers such as Richard Morris Hunt and John Nash exemplified the glorification of the beauty, power, and drama of nature seen throughout the mid- to late-nineteenth century.

A.J. Downing was an inspiration to many landscape architects during the middle and late nineteenth century. His book, *A Treatise on the Theory and Practice of Landscape Gardening Adapted to North America* (1841) was the first book on "rural art"[42] in America, not just a guide to gardening. He firmly believed that human behavior is affected by environment, for good or ill. He held the opinion that beautifying the environment in a romantic, emotional, and sentimental way would appeal to those "imaginative and cultivated few" who were capable of "refined enjoyment" because they had "cultivated and refined minds."[43] He advocated designing rustic buildings that harmonized with the environment, such as the Swiss chalet style in a heavily wooded area. These ideas would influence a whole generation of landscape architects, including the famous Frederick Law Olmsted.

Downing, his contemporaries, and his followers believed in the importance of the beautiful and the picturesque.[44] The beautiful was an idealized version of natural scenery in which the scenery is simplified, while picturesque design attempts to symbolize the complexity and irregularity found in natural landscapes. Downing

[41]The name Glen Iris refers to the beauty of the Middle Falls of the Genesee River. On sunny days, the light strikes the mist and creates a rainbow. "Iris" was the Egyptian goddess of the rainbow. Letchworth and his Nameless Club friends gave fanciful names to a number of spots around the estate, including Inspiration Point and Devil's Oven.

[42]Norman T. Newton, *Design on the Land*, (Boston: President and Fellows of Harvard College, 1976), p. 261.

[43]Ibid., p. 263.

[44] A good definition and discussion of the picturesque and beautiful styles can be found in Philip Pregill and Nancy Volkman's *Landscapes in History*, (New York: Van Nostrand Reinhold, 1993), pp. 403-404.

described the different aesthetic styles this way:

> The Beautiful in Landscape Gardening is produced by outlines whose curves are flowing and gradual, . . . in the shape of the ground, it is evinced by easy undulations melting gradually into each other. In the form of trees, by smooth stems, full, round, or symmetrical heads of foliage, and luxuriant branches. . . . In walks and roads, by easy flowing curves, following natural shapes of surface, with no sharp angles or abrupt turns. . . . The Picturesque in Landscape Gardening aims at the production of outlines of a certain spirited irregularity, surfaces comparatively abrupt and broken, and growth of a somewhat wild and bold character. The shape of the ground sought after, has its occasional smoothness varied by sudden variations, and in parts runs into dingles, rocky groups, and broken banks. The trees should in many places be old and irregular, with rough stems and bark. . . .[45]

However, Downing did not believe that these two aesthetic styles were completely separate from one another. In reality they were ends of a continuum, with multiple variations and a mixing of styles in between. Downing himself often preferred to use the beautiful style when he was working near a building, and move towards the picturesque as he moved away from the building, using plantings to frame the views in the distance.

One disciple of the naturalistic style of Downing was William Webster of Rochester, the landscape designer hired by Letchworth in 1860 to restore the Glen Iris lands. Webster was born in Hamstead, England, around 1817. He came to America by 1828, and settled in Rochester in 1833. Little is known about his background, and aside from a few professional references, he is an enigmatic figure. Rochester business directories list him as a gardener, landscape engineer & grapery, and landscape engineer. In addition to his work for Letchworth, Webster laid out the grounds of the University of Rochester (Prince Street Campus), Alfred College, Keuka College, and designed the entrance to Cornell University. He worked on a number of projects in Tennessee, including the assembly grounds at Monteagle, and Maplewood Park in Nashville. He also worked with horticulturist James Vick in the design of Hyde Park in Chicago. While in Illinois he was hired to design the landscapes for the Chicago Exposition of 1893. In addition, he designed the grounds for the Western House of Refuge at Albion, which was one of William Letchworth's projects during his tenure on the New York State Board of Charities. Webster died in 1911, and his obituary proudly states that he was the oldest landscape gardener and horticulturist in Rochester.[46]

When Letchworth purchased the Glen Iris land in 1859, his first order of business was to clear the debris left over from the lumbering and sawmills around the middle falls. Webster was brought in to help with the reforestation and to plan the roads, paths, stone walls, buildings, and plantings for Letchworth's approximately 200 acres. Webster's plans were in the style of Olmsted, who had just completed drawings for New York's

[45] Ibid., p. 404.

[46] "William Webster Dies at Age of 94 Years," *Union and Advertiser*, (Rochester, New York, March 9, 1911).

Central Park. He was focused on the beautiful, rather than the classical, which meant winding paths, naturally shaped bodies of water, and irregular plantings. Letchworth and Webster envisioned a park in Olmsted's use of the word: a place of repose, to be protected from the invasion of the city.[47]

By 1861 Webster had already implemented some of his design plans. He wrote an article called "The Ornamental Farm," which was published in *Moore's Rural New Yorker* in March of 1861. In it Webster discusses the importance of rural estates, his designs, and the general layout of the Glen Iris grounds. The article discusses some of the changes made to the estate, including stone walls, entrance gates, fish ponds and lakes, shelters, overlooks, and gardens near the Homestead.[48] He bemoans the fact that the Homestead and the outbuildings were placed where they were, as they were not in what he considered an aesthetically appealing location.[49] Webster worked with Letchworth throughout his lifetime on improving the property. By 1875 Letchworth had planted between 8,000 and 9,000 new trees throughout his acres to replace the ones cut down by the lumbermen. A contemporary wrote that ". . . in planting these [trees] so closely has nature been imitated that most of them are mistaken for original growths."[50]

As a nineteenth-century gentleman, Letchworth believed that life was enriched by natural and beautiful surroundings- an ideal in sharp contrast to the rise of urban industrial America. The natural movement of this period was also part of the intellectual's search for the truth-and truth was to be found in nature; Letchworth reflected, "all great art results from an earnest love of the beauty and perfectness of God's creation, and is the attempt to tell the truth about it."[51] Thus we have a wealthy industrialist who, at an early age, escapes from the oppression of the urban life and delves into the retreat of a country estate with all its romantic trappings. Letchworth's own writings speak of his love for romance, with passages about lovers and gardens such as, ". . . [the lovers] might indulge that tender passion which becomes so romantic by moonlight, so tender among roses, so interesting and enticing among myrtle and jasmine."[52] When he met with some of his Nameless friends at the Homestead they would take turns reading from authors such as Herman Melville, Sir Walter Scott, and Henry Wadsworth Longfellow. In contrast to his professional success, Letchworth was a dreamer by nature. He had always been fascinated by the romance written about Indians and the pioneers who first settled the frontiers of America.

---

[47]Beale, p. 38.

[48] William Letchworth called his original 200-acre estate Glen Iris, and his house the Homestead. Today his Homestead is the Glen Iris Inn.

[49]William Webster, "An Ornamental Farm," in *Moore's Rural New Yorker*. Volume 12, (March 16, 1861), p. 87.

[50] *History of Wyoming County, New York*. (New York: F.W. Beer & Co.,1880) p. 199.

[51] Crawford & Stearns Architects and Preservation Planners, *Historic Structure Study: Glen Iris Inn*. (Syracuse, New York, 1988), p. 19.

Compared to the beautiful and romantic designs of the Glen Iris grounds, the Homestead was designed in a very Classical style. First built in the Greek Revival style, Letchworth kept this traditional design throughout his changes to the property. He hired architect A.F. Oakey to add on a library for his work and correspondence, which was placed on the new third floor of the building. Oakey also added a stairtower to the third floor and redesigned the porch so that it was on both the first and second floors and wrapped around the building. Even with these changes, the building retained its Classical facade. In keeping with the Downingesque beautiful approach, Webster, who was not happy with the house's style or placement, added exotic plants and vines around the Homestead to essentially disguise the building and make it blend into the landscape. The house was covered in vines, screened by trees, and bounded on one side by a pond. The pond was stocked with goldfish, had a thirty foot jet of water spouting above it, and had a rustic wooden bridge at the east end. A small wooden boat was tied to the bridge and available for friends and family to row around the miniature lake.

In the same spirit, the design of the Council House grounds was also an expression of the romantic spirit of the past. Letchworth was honoring the original settlers on this land, the Seneca Indians. The saving of these buildings, and the landscaping of the grounds around them, the burial of Mary Jemison, and the statue in her honor all intended to evoke the spirit of the Seneca for the visitor to the estate. The previously open grounds were planted for a future heavy forest, in keeping with Letchworth's view of the untamed wilderness inhabited by Native Americans. A reflecting globe was placed in the center of the plateau to provide visitors with a wider view of the grounds. The addition of rustic arches, gazebos, and the planting of numerous trees by Webster brought an air of mystery and romance to the grounds that was in keeping with the spirit of the estate.[53]

Of the two Swiss chalet-style residences designed by Letchworth and Webster in the park only one survives. The Swiss Cottage was moved to the Council House Grounds from its original location between the Upper and Middle Falls to be used as a caretaker's cottage. The building was razed once the American Scenic and Historic Preservation Society took over the park in 1911.[54] The Society expected that the caretaker would live in the Nancy Jemison Cabin. Lauterbrunnen, the other Swiss chalet, was the main house for one of Letchworth's farms. The Society kept it and many of it's outbuildings in good repair and the main house was used as the Park Superintendent's residence. The decorative woodwork and fanciful design of the building are in keeping with the romantic ideals espoused by Downing and Webster. Webster's design included the pre-requisite cut-out patterned balustrade, second-story porch, and wide eave overhangs. This picturesque style had been

[52] Beale, p. 32.

[53] For a more detailed historic description of the Council House Grounds, see George W. Curry and Associates, *The Council House Grounds Landscape Preservation Plan*, 1996.

[54] Sources differ as to the reason for the demolition of the house. According to the December 19, 1911, minutes of the Letchworth Committee, the Council House Grounds were too congested to accommodate the visiting public, and therefore the Swiss Cottage should be razed and the Nancy Jemison cottage moved to open up the area. It also might have offered a visual distraction from the rustic park-like appearance of the grounds, as is suggested by *The Council House Grounds Landscape Preservation Plan* prepared by George W. Curry and Associates.

recommended by Downing for "bold and mountainous sites."[55] The sighting of the building on top of an open plateau gave it a wonderful view over the gorge. While the original farm-like appearance and setting associated with the building has been changed with the addition of paved roads, additional buildings, and re-forestation, the romantic spirit of the Lauterbrunnen property is still apparent.

Today the original Glen Iris estate has lost some of the mid-nineteenth century flavor so desired by Letchworth and Webster. The land around the Homestead has been cleared and a large parking lot exists where the formal gardens were once located. As the trees on the property grew they lost some of the romantic flavor and made the grounds more substantial. The miniature lake is significantly smaller, the bridge has been removed, and the fountain turned down so that it no longer sprays as high. However, many parts of the Letchworth and Webster designs remain; the Homestead, with its severely diminished formal gardens and the altered pond; Reuben Jones' Prospect Home Farm with the home, barn, some outbuildings, and the allee of trees; the Council House and Nancy Jemison Cabin on the Council Grounds, along with some of Letchworth's memorial trees; and the Lauterbrunnen farm with its main house, outbuildings, and landscaping features. In addition, the road and trails system throughout the estate begun in the late-nineteenth century can still be seen in the park roads and paths still used today, along with the stone walls throughout the park which were initiated under Letchworth and Webster.

While the beautiful style was an exaggerated version of nature, the picturesque was a celebration of the nature unspoiled by man. The picturesque style was utilized throughout Letchworth's 200 acres in the trails along the gorge, rambles in the woods, and vistas from sites all over the Glen Iris lands. The overlooks along the trails were designed to present the dramatic view of the untamed river and falls. Trees were planted around the gorge not for effect but to restore what had been removed by man. The beautiful designs around the Homestead gradually flowed into the picturesque scenery that could be viewed from the edge of the gorge or the overlook designed by Webster behind the Homestead where Pinewood Lodge now stands.

In 1861 Letchworth, like many Americans, was shocked by the beginning of the Civil War. He attempted to enlist, but his "delicate health" prevented him. Instead he supported the war effort in many ways, including contributing to soldiers funds. The iron works in Buffalo were thriving, and Letchworth took comfort in the fact that while he was prospering, he was also helping the soldiers by manufacturing plenty of harnesses for the soldiers' horses. Letchworth also provided many hundreds of soldiers with work upon their return, employing them in his factories.

The Young Men's Association, with whom Letchworth had been very involved, opened the Buffalo Academy of Fine Arts in 1864. Letchworth became president of the organization in 1871 and brought the financially struggling group into the black. He also established the Wyoming Benevolent Institute, "To establish and

[55] Virginia and Lee McAlester. *A Field Guide to American Houses*. (New York: Alfred A. Knopf, 1985), p. 231.

maintain in the County of Wyoming an institution for the support and education of indigent young persons."[56] Letchworth was supported in his crusading activities by his friends, particularly those in the Nameless club. He personally supported children as well, including adopting a young boy named Harvey D. Blakeslee who had been working as an orange seller.

In 1865 Letchworth established the Buffalo Malleable Iron Works, which was an instant success. He had recently invented a new bridle bit for horses that was not as breakable as solid metal, or as hard on the horse's mouths as twisted wire. This patent increased the profits and the prestige of Pratt & Letchworth significantly. At his new factory he improved general standards by having clean water, fresh air, general sanitary conditions, and even a reading room for the workers. His design for the iron works would become a model for his crusade for better conditions at asylums and hospitals in the future.

Letchworth surprised many people in 1871 when he began to retire from business at the age of 47 to become a full-time philanthropist and reformer. He felt that there was a great deal of good that he could do in the world, and that his life had been spared in a carriage accident years before so that he could help people, particularly children. He had seen the rise in poverty and was appalled at the conditions under which some children lived. He was a trustee in the Buffalo Female Academy, and would soon form the Buffalo City Children's Aid Society with P.P. Pratt. He was also dismayed by the crowded, unsafe, and unsanitary conditions under which children lived at the Erie County Poorhouse. The destitute, along with prostitutes, murderers, thieves, and children, were crammed together inside the building. The children were hungry, ragged, and uneducated. Letchworth felt that the influences and environment in the poorhouse would keep any chance of a good life from coming to these children.

An opportunity came to Letchworth to effect change on a broad scale. In 1873, after his full retirement from business, he was appointed to the New York State Board of Charities, a forerunner of the State Department of Social Services. The Board was designed to oversee all charitable organizations in the state, including both government and private agencies. Letchworth decided he would do all in his power to bring about sweeping reforms, particularly as they affected children. He also decided that he would receive no salary or compensation for his work. He believed that this would protect him from the appearance of political favoritism.

His first order of business was to bring children out of the poorhouses and almshouses. While Letchworth felt that such institutions were necessary, he felt that the placement of children in places with the sick, insane, and dissolute was very dangerous. He toured the almshouses and studied the issue before approaching the Erie County Poorhouse once again. He consulted with children's groups and orphanages in the county and convinced them to take a share of the 72 children currently in the poorhouse. Once he had their agreement, the children were released and taken to their new homes. Letchworth then had to find a way to prevent them ever going back. A law would be needed to remove all children from the almshouses in the state. He surveyed all of the poorhouses, reporting on the horrible conditions in which he found children. In 1875 he submitted his report, and later that year the Children's Law was passed. The law removed all children between the ages of three and

[56]Beale, pp. 52-53.

sixteen from poorhouses and almshouses. With the implementation of the new law children were cared for exclusively in institutions designated for children.

In addition to this project, Letchworth was also involved with other institutions. He organized the Buffalo Society for the Prevention of Cruelty to Children and was involved in assisting the Thomas Orphan Asylum on the Cattaraugus Indian Reservation.[57] He attended the first National Conference of Charities and Correction, a group with which he would be associated all of his life. At the second Conference, two of Letchworth's recommendations were passed by the delegates: 1. Secure legislation in the various states to remove all children from poorhouses; 2. Provide a systematic plan of visitations to families with foster children.[58] These recommendations had far-reaching effects on the care of dependent children all over the United States.

Letchworth's interests were wide and varied. He was elected president of the Buffalo Historical Society in 1878, and was active during this time in preserving Native American history on the grounds of Glen Iris. He founded the Charity Organization Society, a city-wide agency in Buffalo that investigated relief requests and referred applicants to the appropriate charitable organization. He was also elected president of the New York State Board of Charities in 1878 and traveled extensively studying the conditions in poorhouses, orphanages, and other institutions. He was looking after the children's general welfare, but also the architecture and design so that heating, ventilation, sewerage, and outdoor recreation areas could be improved.

In 1880 he moved from the care of children to the conditions of the insane in poorhouses. He was a great admirer of Dorothea Dix, a crusader for the care of the insane. Letchworth felt that care of the mentally ill was more advanced in Europe, so he sailed from New York City to study the treatment methods employed by various European countries. He wanted to discover if there were more methods than just custodial care- he wanted

Upon his return to New York, he toured the county asylums across the state. He recommended that the state take over the institutions. Many people believed that the insane were immune to pain and that they could spread their madness to others. Therefore they were often kept chained or in tiny cells, barely large enough for one person to lie down. Letchworth was later appointed Chairman of the State Insane Asylum Commission. Based on his travels, he wrote and published *The Care of the Insane in Foreign Countries* in 1889. It was the first important book on the subject published in America, and was a critical success.

Letchworth had long been a proponent of women's rights, especially in charity organizations. He felt that in many cases women were better managers and more caring for the disadvantaged than many men. He was also concerned about the temperance movement. While he did drink wine, he believed that drink was dangerous to many people and could lead to poverty. When confronted for his own social drinking, he gave up alcohol

[57]The Thomas Indian School has been listed on the National Register of Historic Places, however, there are no buildings left from the Thomas Indian Orphan Asylum, which predated the building of the present school in 1900.

[58]Beale, p. 68.

altogether.

Juvenile reformatories also caught Letchworth's attention. He believed industrial education was important in the reform of many of the young men. He also found that all of the juvenile offenders were usually kept together in the reformatories, and that this promoted more destructive behavior among the boys whose worst offense was simply "high spirits." He believed segregation by crime would help prevent bad behavior rubbing off on these mild offenders.

Industrial education was also important to the Thomas Indian Asylum, a favorite institution of Letchworth's. The women of the program sewed shirts for the government to raise money to keep the institution open. Letchworth was so fond of this program he supported it financially for many years. He was also busy at Glen Iris. He was trustee of the Genesee Falls School, and when the school became too run-down for use during the winter, Letchworth offered to build a new school on his property for free.[59] Even after this he took a keen interest in the school; he continued to bring the students to his estate for picnics, award prizes for achievement, and even lecture on Wyoming County geography. He also established a program of bringing groups of Buffalo orphans to Glen Iris for two weeks in the summer. The children got to enjoy the outdoors, eat fresh food, and learn about nature.

Letchworth was very interested in farming, particularly the breeding of cattle. Originally he had kept Jersey cattle on the estate, but he soon moved to purebred Shorthorn cattle, a breed that was easy to care for, fast growing, and gave rich milk. He became interested in selective breeding of the herd, giving his cows names such as Second Rose of the Valley and the Princess of Ingleside. He had five working farms on the estate where he was constantly experimenting with the latest techniques and inventions.[60]

In 1888 Letchworth retired as president of the State Board of Charities after ten years. While he remained on the Board, he wanted time to complete other projects. He was also 65 years old, and had been on the Board for fifteen years. However, even though he was retiring, he was not giving up his crusading. His next focus was the care of epileptic patients. Epilepsy was not yet understood, and while there were a few private institutions for epileptics, these were financially out-of-reach for many families. In some cases, families were forced to place epileptics in poorhouses or insane asylums. Treatment was not appropriate, and while epileptics were clearly not insane, their fits often scared the mentally ill patients.

Letchworth believed the solution was a public institution for the care of epileptic patients. In 1892 he went looking around the state for a location with Oscar Craig, the new president of the Board of Charities. They chose

[59] The Genesee Falls school was razed in 1947. The Genesee State Park Region rebuilt the schoolhouse on Trout Pond Road, and it is now used for concessions storage.

[60] There is a discrepancy between the secondary sources on the number of farms on Letchworth's estate. Five farms are mentioned in Irene Beale's *William P. Letchworth: A Life for Others*, but other sources found only refer to four farms. The four known farms were Chestnut Lawn farm, Prospect Home farm, Lauterbrunnen farm, and the Homestead farm.

Sonyea, in Groveland, Livingston County. The land was owned by the Shakers, a communal religious society, who were planning to sell the property due to a dwindling number of members. They sold the 1800 acres of land for $115,000, and the property was named Craig Colony in honor of Oscar Craig, who died during the property search.[61] Letchworth helped with the plans for the institution, using his interest in architecture to remodel the old and design the new buildings. His suggestions for this project led to the New York system of almshouse construction, which was eventually adopted throughout the United States.

In 1893 Letchworth had been on the Board of Charities for twenty years. In honor of this achievement he was awarded the degree of Doctor of Laws by the Board of Regents of the State University of New York. This was quite an honor for a man who had finished his formal education at the age of 15. In 1896 he retired completely from the Board of Charities. He continued to attend the National Conference of Charities and Correction, and the 1898 meeting led to the founding of the National Association for the Study of Epilepsy and the Cure and Treatment of Epileptics. Letchworth was elected president, and soon after he published his new book, *The Care and Treatment of Epileptics*. In 1901 he attended a meeting of the Association for the Study of Epilepsy in Washington DC. While he was there he visited Clara Barton, the founder of the Red Cross, at her home outside the city.

In 1903, at the age of eighty, Letchworth suffered a stroke, which finally began to slow his pace. The patients at Craig Colony honored him that same year by presenting him with a silver loving cup which had been paid for by the patients and staff. Over 1,000 people contributed, none giving more than five cents. The cup was inscribed with the words, "Inasmuch as ye have done it unto one of the least of these, my brethren, ye have done it unto me."[62]

Letchworth remained interested in the study of the Seneca throughout his life.[63] Along with moving the Council House and Nancy Jemison cabin to Glen Iris, he also collected many Native American artifacts from around the region. He housed many of them in a small fireproof structure on the Council Grounds, but died before a more permanent museum could be built near the Homestead as he desired. The American Scenic and Historic Preservation Society erected the Pioneer and Indian Museum, which Letchworth had helped design and plan, after his death. Letchworth also edited numerous versions of *The Life of Mary Jemison*, which were sold at the park and at the Cattaraugus Reservation. In 1908 he commissioned sculptor Henry K. Bush-Brown to design a statue of Mary Jemison for her grave. Using a Scots-Irish girl as the model, and original Seneca clothing, Bush-Brown sculpted a bronze statue of what Mary Jemison might have looked like. On September 19, 1910, the statue was unveiled at Glen Iris. Members of the Livingston County Historical Society, the American Scenic and

[61] Approximately 65 buildings from the Sonyea settlement, Craig Colony, and a later mental health hospital are still located in Groveland. The buildings have been determined to be National Register eligible. They reflect the historical evolution of a significant private and state social institution during the nineteenth and twentieth centuries.

[62] Beale, p. 178.

[63] See Native American Occupation section.

Historic Preservation Society, and Mary Jemison's descendants were present. Letchworth was also honored that year with the prestigious Cornplanter Award for Iroquois Research. This award was sponsored by the Cayuga Historical Society of Auburn and funded through drawings and writings of Jesse Cornplanter, a descendant of the famous chief.

While Letchworth was planning for the future of his estate, programs he had fought for through the years were moving forward. The women of the Rochester Asylum were finally moved out of the antiquated building and into the new, modern, Western House of Refuge for Women at Albion. The boys from the same institution were also moved into a new complex called Industry which was made up of 31 cottages, 25 boys, and one teacher. The children learned farming and trades that would be useful to them in later life. The Buffalo Children's Aid Society, which Letchworth started for newsboys and bootblacks, moved into a new and larger building. A Pennsylvania epileptic clinic was named the Letchworth Clinic for the Home Treatment of Epileptics. A new state asylum for mentally retarded children in Rockland County, New York, was named Letchworth Village.[64] Letchworth had assisted in planning for the new institution, and was greatly honored by the state's gesture. Letchworth also wrote the foreword to a new book, *In Spite of Epilepsy,* by Dr. Matthew Woods of Philadelphia. Letchworth was fortunate enough to be able to see much of his life's work coming to fruition, but he always felt there was more work to be done. On December 1, 1910, Letchworth began planning a memo for starting a new organization. This one would be called "The Protective League for the Benefit of Young Persons Seeking Employment," and was based on his concern that some advertisements for employment for young people were not for honest labor, but instead were lures to trap unwary children into illegal practices. Unfortunately, this memo was never completed. William Pryor Letchworth died that day at the age of 87. He left behind a legacy of good works and service that few people can match.

Flood Control/Hydro-electric Proposals for the Genesee River During the Letchworth Era

Since it plowed its course through what is now the Genesee Valley, the Genesee River had always had periods of flooding. Heavy snows up river and a sudden melt regularly brought the river up over its banks along its length north of the Genesee River Gorge. There were serious floods in 1785, 1817, 1818, 1835, 1841, and 1865. Settlers along the river continued to dam sides of the river and build mills, and the river regularly swept them away down river toward Rochester. Crops were ruined, farms destroyed, and businesses permanently closed. In 1865 the Mayor of Rochester asked the U.S. Army to release the men of Rochester from military duties to help in the flood recovery, but his request was denied. The Army still needed all of its men for the Civil War effort, and Rochester, already suffering from the effects of the war, had to deal with the flooding unaided.

A commission was formed to study the flood conditions in Rochester and come up with recommendations to prevent its recurrence. The commission suggested that retaining walls be built, ice breakers be installed, flood gates be built on the Johnson and Seymour Dam, the ruins of the first Erie Canal aqueduct be removed, and the river bed be excavated. The Main Street bridge would also be raised to allow more water to pass beneath it. Another flood due to an ice jam in 1875 showed the city that its preparations were not solving the problems.

[64] Letchworth Village has been determined to be eligible for the National Register.

In 1889 a surveyor of canals for New York State suggested that a reservoir of water from the Genesee River would benefit the flow of water in the Erie Canal, should it ever run low. A committee then studied the issue and recommended that a storage dam be built between the Lower Falls and Mt. Morris. The Mt. Morris location was approved by a legislative commission in 1894. The following year an act to authorize the construction of the dam was passed, but soon vetoed by Governor Levi P. Morgan. He believed that the reduced use of the Erie Canal did not warrant the expense of such a project. However, he did agree that the proposed locations, all near Mt. Morris, were good locations for the structure.

By 1896 the hydro-electric dam at Niagara Falls had been built. Investors began looking for a new site for a similar power plant, and the Genesee Falls seemed like an ideal location. Surveyors began saying that the best place for the dam was above the falls at Portageville, not below at Mt. Morris. While it was stated that a dam located here would be cheaper to build and work better, the true drive behind this location was the profitable use of the water power to generate electricity. The presence of a dam, 1,000 feet upstream from the High Bridge, would create a lake fifteen miles long and reduce the water flowing over the falls to a trickle. Letchworth fought long and hard to prevent the Genesee River Company from being incorporated and authorized by the state to build the dam at this location. The act passed, but with the provision that the dam had to be started or ten percent of the Company's capital spent within five years, or else the corporation would lose its authorization and be dissolved. When the five years were up in April of 1903, no money had yet been spent, in part because there were few investors to be found. Letchworth could relax and believe that the dam above the Upper Falls would not become a reality.

Three years later a state senator from Rochester introduced a bill to renew the life of the Genesee River Company for another five years. Due in part to the timing, Letchworth was not aware of the bill until it had already been passed. He pleaded with the governor to veto the act, but was unable to sway him. One state official wrote Letchworth saying:

> I am amazed at the extensive rights which are placed at the disposal of this private corporation. If . . .they carry out their project, they will own and use for their purposes and private benefit both the Genesee River and the Genesee Valley. It seems to me to hold a record among land and water grabs.[65]

Letchworth was worrying over the fate of his beloved Glen Iris estate. He wanted it to remain a place for visitors to explore and enjoy. He had originally intended to give it to the Wyoming Benevolent Institute, but decided the group was not strong enough to fight the conservation battle that seemed imminent. He began looking for an organization that would be good stewards of his property. Letchworth contacted the American Scenic and Historic Preservation Society, a newly formed organization that had already helped to limit development around Niagara Falls and protect the Palisades from being cut away for building material. Letchworth became a

[65]Beale, p. 179.

member of the Society, and began discussions with its officers about how best to preserve his estate. The final plan was to present the lands as a gift to the State of New York, retaining a life tenancy on the property, and upon his death the Society would have control and jurisdiction over the lands as a state park. This plan was adopted by the state, and his Glen Iris estate and the surrounding land owned by Letchworth became known as Letchworth Park. In making this agreement, the state agreed that no power development would be allowed on any land donated by Letchworth.

The Genesee River Company was not yet defeated, however. While Senator Alfred R. Page tried to revoke the Company's charter, another senator who was also a Company owner said that Letchworth had become reconciled to the dam project and even considered buying stock in the Company. This was patently untrue, but the lie convinced enough senators that the revocation bill was defeated. Another Company owner, Assemblyman Edward Schoeneck, introduced a bill to amend the Company's charter. The result would be the submersion of part of the park, the diversion of water from the falls, and allow the condemnation of land all along the river. An outcry from the public and newspapers demonstrated how important the gift was to the people of New York. The bill did pass the Assembly, but was not passed in the Senate. The Genesee River Company was finally gone. The State of New York did try to build the dam itself, but through the efforts of the Scenic and Historic Preservation Society, the bill was finally defeated and Letchworth Park was safeguarded for the future. The dam, when it was built, was constructed down river, near the village of Mt. Morris.

Letchworth's Estate as a Public Park

During the second half of the nineteenth century Americans were faced with social problems, caused in part by increasing urbanization, industrialization, immigration, and the advance of technology. Problems such as crime, poverty, and insanity seemed more prominent now that there were more people in a more confined area. Many people began to believe in the restorative powers of nature. Individuals such as William Letchworth felt that a closer tie with nature would assist in curing some of the problems of society. By opening his estate to the public, he provided visitors with beautifully planned vistas, educational opportunities, and even a reading room near the gorge. He, along with many other individuals across the country, believed that the chance to get away from the crowded, urban environment, even for just a few hours, would improve the outlook of society. He also firmly believed in the value of conservation of both built and natural resources. His feelings were well expressed on this subject in this statement: "Whatever may be preserved now, unless quickly gathered, may be lost."[66] He exemplified this idea through his acquisition of the land around the Genesee River falls, the purchase and restoration of the Caneadea Council House and the Nancy Jemison Cabin, and his planting of trees to restore the balance of nature. In this he was well ahead of most of society, most of whom would not discover the importance of conservation until the early twentieth century. A few efforts were beginning, however, mostly surrounding specific scenic wonders and important historic sites in the United States.

[66] Ruth Rosenberg-Napersteck and Edward P. Curtis, Jr. *Runnin' Crazy: A Portrait of the Genesee River*. (Virginia Beach, VA: The Donning Company/Publishers, 1996), p. 7.

The National Conservation Movement

A concern for the preservation of the natural environment was slowly becoming important during the late nineteenth century. Americans were becoming aware that their natural resources were quickly disappearing due to industrialization and exploitation. Efforts were made by a variety of private citizens to save lands from desecration, particularly in the western states. These lands would eventually become the basis for America's national and state parks. This movement toward conserving the nation's natural heritage became part of the Progressive Era. Progressive politicians such as Theodore Roosevelt, William Howard Taft, and Robert M. La Follette were interested in reforming corrupt government, "cleaning up" society through prohibition and women's suffrage, and conservation. Their interests were not necessarily those of the common people; rather, they spoke for the upper and upper-middle classes from which they came. Private organizations, including the Sierra Club, Landmarks Club, and the Association for the Preservation of Virginia Antiquities were formed in the late nineteenth century from this same segment of the population to save natural and man-made wonders all across the United States.

A key event in the conservation movement at the federal level was the purchase of land in Wyoming on March 1, 1872, that later became Yellowstone National Park. Individuals who had visited the area successfully lobbied Congress to establish the park; however, no funds were allotted for the park, which was expected to be self-sustaining. Beginning in 1886 and for the next thirty years the Army controlled the park under the supervision of the Department of the Interior. At this time roads were built, laws prohibiting poaching and hunting were enacted, and the park boundaries were marked. During the 1890s Yellowstone was joined by Yosemite, Sequoia, Mt. Rainier, and General Grant National Parks.

One of the primary leaders behind the National Park movement was President Theodore Roosevelt, who strongly believed in the value of the conservation of natural resources. In the early 1900s he established Grand Canyon National Park by presidential proclamation, as well as Devil's Tower National Monument in Wyoming. All told, Roosevelt created five national parks, four game preserves, and fifty-one wild game refuges. During his term in office the Antiquities Act of 1906 was passed, protecting Native American sites from the depredations of "pot-hunting." The Act also allowed the president to set aside land already owned or controlled by the United States as a national monument if it had historic, prehistoric, or scientific importance.

In 1908, Roosevelt, aided by Gifford Pinchot, the first director of the National Forest Service, convened the Conservation Conference of Governors to explore ways to preserve natural resources such as minerals, soils, water, and forests through a national plan. While the conference did not achieve its intended goal, which was to sway members of Congress to support the conservation movement, it did lead to the establishment of the National Conservation Commission, whose mission was to inventory all of the water, forest, land, and mineral resources in the United States. Unfortunately, the Congress would not look at the document, and even refused to

have it printed.[67] The document finally was printed by the Commission members through their own funds. In addition, the Conservation Conference led some states to establish conservation commissions of their own.

In 1916 the National Park Service was officially established to bring all of the National Parks under the control of one central administration. Until this time each park was controlled by its own supervisor and staff, each had been established by its own act, and all operated in different ways. The National Park Service was housed in the Department of the Interior, with Stephen Mather as its first director. The National Parks Act, enacted August 25,1916, stated its purpose as follows:

> This service thus established shall promote and regulate the use of Federal areas known as national parks, monuments and reservations hereinafter specified by such means and measures as conform to the fundamental purpose . . . to conserve the scenery and the natural and historic objects and the wild life therein, and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations. [68]

The example of the National Park Service inspired and guided many states into developing their own state park services, although a few states had already begun to conserve their significant resources and sites prior to 1916. The first state park was Yosemite in California in 1864; it was given to the federal government in the 1890s. Another state park was not established until 1885, when New York created the Niagara Falls Reservation and granted one million dollars for land purchase and expansion. New York also established the Adirondack Forest Preserve to protect large tracts of the mountains from lumbering during the same year. Other parks were slowly developed in the states during the end of the nineteenth century and the beginning of the twentieth century. The establishment of state parks throughout the nation was partly the result of private conservation groups who urged state legislatures to preserve and protect scenic areas.

The American Scenic and Historic Preservation Society Era

One of the earliest and most widely known of these private groups was the American Scenic and Historic Preservation Society (ASHPS). Founded in 1895 by conservationist Andrew Green, the ASHPS members considered it their mission to protect scenic and historic sites. The ASHPS was chartered by the New York State Legislature in 1895 as:

> . . . a national organization of men and women for the protection of natural scenery and the

[67] The United States Congress was not in favor of many of Roosevelt's programs and tried to block him at every turn. In addition, many Congressmen were big businessmen with their money in lumber, hydroelectricity, and cattle raising. All of these industries were adversely affected by Roosevelt's conservation goals.

[68] Newton, p. 530.

preservation of historic landmarks, in the city or country made beautiful by nature or art; to preserve landmarks, objects, and other records of the past and present; to erect historic memorials, and generally to promote popular appreciation of the scenic beauties of America and respect for the history of the nation, its honored names and physical memorials.[69]

The ASHPS was headquartered in New York City, and its chief method of operation was to act as a custodian for parks and sites around New York, acquiring them, maintaining them, and keeping them open to the public free of charge. Their collection of sites and parks included John Boyd Thatcher Park near Albany, Battle Island Park between Fulton and Oswego counties, Stony Point Battlefield Reservation on the Hudson River, Fort Brewerton on the Oswego River, Watkins Glen near Seneca Lake, Letchworth Park on the Genesee River, Philipse Manor Hall in Yonkers, Hamilton Grange in New York City, and John William Draper Memorial Park in Hastings-on-Hudson. Many of these sites later were released into the hands of the State of New York.

In addition to managing sites, the ASHPS worked on behalf of numerous sites not under its care, supporting or opposing pertinent legislation. The Society worked for the improvement of cities through the protection of parks, historic buildings and historic districts. They erected monuments and plaques, helped to establish parks, and pushed for the creation of the New York State Conservation Department. The ASHPS was active on behalf of sites throughout the United States and Europe. Some sites which benefited from the Society's efforts were the Octagon House in Washington DC; Niagara Falls, Palisades Interstate Parkway, and Storm King Mountain in New York; Washington Square, Inwood Park, Fort Washington, Fraunces Tavern, and the Morris Jumel House in New York City. They assisted in reconstruction efforts in France after World War I, and assisted in establishing cemeteries in France for American soldiers who died in the First World War.

Each site under the stewardship of the ASHPS was controlled by a committee which oversaw the paid staff working at the park or site. Letchworth Park came under the supervision of the ASHPS in 1911. While the park was owned by the State of New York, the Society was responsible for the management and funding for the park during its first thirteen years. There were twelve members on the Letchworth committee, although only the ones who lived near the park in western New York were regular visitors and influential members of the committee.[70] The chairman of the committee, Charles Dow, also became the director of the park from 1911 until his death in 1920. Dow, a family friend of William Letchworth, had talked with him many times before his death, and he had a clear vision of the direction the park should take. Letchworth had also written a letter to the Society expressing his wishes for the land.[71]

---

[69] *Bulletin of the American Scenic and Historic Preservation Society*, Volume 1, Number 2 (June 1929): 3.

[70] Members of the first committee were: Charles Dow, Chairman; Liberty Bailey, Robert Fryer, Francis Whiting Halsey, Wolcott J. Humphrey, Thomas Kingsford, Henry Lipziger, Ogden P. Letchworth, N. Taylor Phillips, Henry Sackett, Charles Vail, and George Kunz.

[71] William Letchworth's letter can be found in the collection of the American Scenic and Historic Preservation Society at the New York Public Library. The letter is part of the minutes of the Letchworth Park Committee, dated December 19, 1911.

Among the primary features Letchworth had envisioned for the park were a new museum to house his Indian collection and an arboretum at the northern end of his 1000 acre estate. A small metal fireproof building had been erected by Letchworth at the Council Grounds to house some of his artifacts, but a more permanent structure was needed. He had planned for a new building to be placed near the Homestead, but passed away before the plans were finalized. In 1912 the ASHPS broke ground on the new museum and library, which would be managed by Caroline Bishop, Letchworth's secretary. The museum's collection included important Indian artifacts, a mastodon skull found in a nearby village, items of natural history such as local birds and plants, Letchworth's books and letters, and items relating to the early settlers of the region. On November 9, 1912, the cornerstone was laid for the structure. Liberty Bailey[72], a member of the Letchworth committee, sent his remarks to Dow to be read at the ceremony:

> I am looking for an essentially new kind of work to come out of Letchworth Park. This enterprise will represent not merely the ornamental, the static and the sentimental, but rather more the active and virile contact with the larger aspects of nature. Letchworth Park is to stand singularly for trees and forest, and for the things that are large and rugged.[73]

The arboretum was a continuation of Letchworth's interest in the reforestation of the Genesee River gorge. Ever since his first view of the falls he had wanted to replant the hills and lands around the river. During his lifetime he planted approximately 10,000 trees on the grounds of his estate. When he presented his ideas for the future of his land to the Society he pointed out areas that needed planting and encouraged the development of an arboretum, which would bring more trees to the lands and provide educational opportunities for visiting forestry groups and scholars alike. Booklets were published for the public, describing the project and listing the trees planted on the park's tree plantations. Letchworth Park committee members consulted Gifford Pinchot of the United States Forest Service and George Sudworth, an eminent dendrologist, about filling the post of Park Forester. They suggested Overton Price, Vice-President of the National Conservation Association, for ten years the Assistant Forester of the United States, and "a great factor in the 'Conservation Movement.'"[74] Price accepted the position and remained with the park until his death, upon which time George Sudworth took over the Forester post.[75]

---

[72]Liberty Bailey was dean of the College of Agriculture of Cornell University. He was appointed by President Theodore Roosevelt in 1908 to head the Country Life Commission to survey conditions of rural America and make recommendations for their improvement. He was the editor of *The Cyclopedia of American Horticulture* and the *Cyclopedia of American Agriculture*. He was honorary member of the American Society of Landscape Architects.

[73]Letter from Liberty Bailey to Charles Dow, November 7, 1912. Reprinted in minutes of the Letchworth Park Committee, (November 9, 1912), p. 9.

[74]Minutes of the Letchworth Committee, (December 19, 1911), p.18.

[75] George Sudworth (1864-1927) was the Chief of Dendrology of the U.S. Forest Service from 1904 until his death. He became dendrologist at Letchworth in 1912, a post he retained throughout the rest of his life.

The arboretum was a critical success among foresters and dendrologists, as well as providing trees for other parts of the park over the years. The climate and topography of the park were well suited for many of the trees planted, which came from all over the world. Numerous forestry groups came to the site and approved of the work being performed at Letchworth. The worst problems came from seedling damage by rabbits and from fire, which was usually started by sparks falling from either the Erie or Pennsylvania Railroad trains. Eventually guards had to be hired to patrol the lands near the train lines during the dry seasons to watch for any potential damage.[76]

While the committee was generally respectful of Letchworth's wishes, they did make some changes to the property. Some of the most noticeable were at the Council House Grounds, where, in addition to the Council House, the Nancy Jemison Cabin, and Mary Jemison monument, Letchworth had erected a number of small structures including gazebos, rustic arches, a pavilion, and fences.[77] The Society felt that many of these structures were extraneous and should be removed. The original museum structure was torn down when the new museum was completed, and the caretaker's house, which was Letchworth's Swiss Cottage, located at the Council Grounds, was also demolished because it added to the congestion of the area. The caretaker was expected instead to live in the Nancy Jemison Cabin, which had been moved to the opposite side of the Council Grounds. This shifted it away from the Mary Jemison grave and bronze statue. Letchworth's gazebos, viewing pavilions, rustic arches, and landscaping were all removed to clear the area and make it more accessible for the park's large crowds of visitors. The piece of the Treaty Tree so prized by Letchworth was found to be completely rotted from the inside out and had to be thrown out. A maple grove and many other trees planted for Letchworth were removed and the grounds were landscaped to present the Mary Jemison statue to the best advantage and make the grounds more open and park-like. This was on the advice of Henry K. Bush-Brown, the sculptor of the statue. The Council House was moved to higher ground because its original location had caused the lower boards of the building to rot. An added advantage of the move was that now the building was more visible. In 1921 the Council House had to be re-shingled. Plaques were placed on both the Nancy Jemison Cabin and the Council House to explain their history and significance.

The Society also removed most of the outbuildings near the Homestead, which was becoming known as the Glen Iris Inn and being run by concessionaires. Storage buildings, chicken coops, a carriage house, and other

---

[76] The arboretum can still be seen in Letchworth State Park, although it is not managed as it was under the ASHPS. Today blocks of trees can still be seen along the main park road near the Administration building and near the Erie Railroad lines on the west side of the river.

[77] For a more detailed analysis of the changes to the Council House Grounds, see *The Preliminary Historic Landscape Assessment for the Council House Grounds*, prepared by Doell & Doell Garden Historians and Landscape Preservation Planners, 1994. In addition, George W. Curry and Associates have completed *The Council House Grounds Landscape Preservation Plan* and the *Homestead Grounds Landscape Preservation Plan*, completed in 1996 and 1997, respectively.

farm structures were razed. The maintenance work that was formerly done in the outbuildings at the Glen Iris was now being practiced at Prospect Home and its barns, now known as the Labor Center. The foreman of the park lived at Prospect Home, and this is where the workers gathered for meals and work each day. Old fences and walls that were in poor condition were removed, along with the hedges and gardens near the Glen Iris. The gardens were considered to be in poor condition and would be troublesome to care for. They were also no longer needed now that the park was not a private semi-self-sufficient estate. Trees around the house were removed to clear the sight line of the property, remove dead wood, and prevent fires. Letchworth's orchard to the south of the Glen Iris had been destroyed by high winds and lightning storms and was pulled down and used for firewood by the workmen who lived in the park. These changes opened up the west lawn and gave it a more park-like appearance than had been planned by Letchworth and Webster in the late-nineteenth century. George Kessler, a well-known landscape designer from St. Louis, Missouri, visited the park during its early days and again in 1921. He approved of the work being performed by the ASHPS and remarked that the Society had not ruined the natural design by removing trees and branches and opening everything up.[78]

The Glen Iris Inn was also in need of refurbishment and changes in preparation for visitors who came to dine or stay overnight. The Society added bathrooms, extended the size of the dining room, and divided rooms to accommodate more guests. Beginning in 1912, modernization changes were made, such as indoor water lines and telephones. In 1914 Jamestown Construction Company was hired to renovate the house, add plumbing, and alter the house to increase its size. Lighting was added to the building that year as well. In 1915 a fire escape was installed on the building for the safety of the guests. The Inn was carefully developed by the ASHPS in accordance with Mr. Letchworth's wishes to retain it, with his collection of writings, for public enjoyment. Designs for alteration were carefully executed to be compatible with the existing style of the building.

Changes were also made to the park as a whole. The tenant farmers who leased land from Letchworth were told that their leases were expiring now that the land was part of a state park. This land was turned into pastureland or nurseries for the arboretum. The Society was interested in bringing the area back to their idea of its natural form, and encouraged the settlement of birds and deer in the park by creating a wildlife sanctuary. They had less fondness for rabbits and mice, since they ate the small seedling plants and harmed the growth of the arboretum. To keep the pasture lands under control they decided to import sheep, as well as a shepherd with a dog to care for them. The sheep would eat the grass and weeds in the pasture, and it would be picturesque for visitors to the park. During World War I some of these same lands were planted in wheat and other grains.

Visitor facilities began to be erected during the early ASHPS period. The Society hired men to work on improvements and new development programs in the park. Among the first additions were comfort stations built in 1912 at the Middle Falls, Council House Grounds, and near the rail stop near the Portage High Bridge. Roads were widened and graded to allow more vehicles in to the park. William Letchworth had not anticipated the

[78]Kessler was a noted landscape designer of residential subdivisions, city parks, and cemeteries. He would later design master plans for cities including El Paso, Texas, and Wichita Falls, Kansas.

quick rise in popularity of the automobile, and his roads were designed for wagons and carriages. The sharp curves in the roads were smoothed out, and gravel was spread over all roads to improve traction. Since the roads were not yet paved with asphalt, the upkeep on the roads after a heavy rain or snowstorm was time consuming. In 1914 an open fireplace was built at the Lower Falls for the use of park visitors who wanted to cook, and numerous picnic tables were erected all over the park. Materials for all of these projects came from several quarries that were located within the park grounds.

By 1914 the committee began to discuss building a new hotel inside Letchworth Park. The Glen Iris could only accommodate a handful of guests at a time, and every summer weekend the staff had to turn people away due to lack of space. Letchworth himself had realized this might be a problem and had suggested building a new hotel at the Middle Falls. The committee felt that a point of land called Cole's Cliff, on the west side of the river north of the Glen Iris would be appropriate. The committee considered two different plans for overnight accommodations. One plan was for a large 112-room "English" style inn. In 1924 Wolcott Humphrey, then chairman of the committee, consulted with Cass Gilbert, the well-known architect of the Woolworth Building in New York City, about the design of the proposed hotel.[79] Other committee members, including E.H. Letchworth and Robert H. Treman, questioned the wisdom of constructing an inn at the park. An alternative was to build a "central eating house" with nearby cottages.[80] Treman stated that the park should not be made into a "Coney Island resort, but it should be secluded rather than thrown open . . . to attract the mere pleasure hunter. . . . " He was against the idea of building a hotel noting that, "we ought not to build accommodations to attract the tourists and that the people who wanted to come for a day or so could be taken care of as at Bear Mountain Inn with an open pavilion, dining rooms with beautiful views, and a few sleeping rooms upstairs or in cottages."[81] The committee also investigated the possibility of a golf course at Chestnut Lawn and tennis courts which would have offered more recreational opportunities. Eventually the ideas were dropped and never re-introduced.

Within the ASHPS there were difficult challenges in administering Letchworth Park. The Letchworth committee was responsible for the management of the park on a day-to-day basis and felt that they knew what was right for the park better than the whole Society did. Society officials based out of New York City rarely visited the park, and were not in touch with the issues surrounding its use. Letchworth had left the residue of his estate, approximately $60,000, to the Society for the development of the park. In 1914 the Society recommended that whatever had not been spent should be used to create an endowment fund. The Letchworth committee felt that the money should be spent and that Letchworth expected his money to be used for work on the property now, not saved for an endowment fund. In the minds of the committee members, Letchworth had known his money wouldn't go far, so he wanted the Society to make as many improvements as possible with it, and eventually the State of New York should support the property, since it was under their jurisdiction. Committee member Robert

[79]Letchworth Park Committee Minutes, (May 26, 1924).

[80]Letchworth Park Committee Minutes, (September 27, 1924).

[81]Letchworth Park Committee Minutes, (December 17, 1924.)

Treman pointed out that the ASHPS trustees "are not qualified to administer a park like Letchworth through their New York office."[82] Eventually most of the money from the estate was placed into a fund and called the "Letchworth Legacy."

In later years there were other misunderstandings and power struggles between the Letchworth committee and the ASHPS trustees. Decisions affecting land acquisitions and capital improvement projects had to be approved by the trustees, as well as the state of New York. The committee submitted monthly reports to the trustees that summarized projects in the park. The debate over whether or not to build a new hotel came to a head in 1926 when the trustees went ahead and approved an allocation of $50,000 for the hotel project from the proposed State Bond Issue for parks. The committee members had not yet come to a decision on the hotel and were still studying the pros and cons. The entire committee threatened to resign unless the trustees changed their administration. Adelbert Moot said that the action by the trustees "placed the committee members in a false light with the other members of the State Council of Parks and the members of the Legislature as it made us apparently asking for something which we did not in fact approve."[83] Not long after this controversy, the proposed hotel plans faded away.

Beginning in 1921 the debate about the Mt. Morris Dam resurfaced. While the proposal for the dam at Portageville was finally dropped, the specific plans for the placement and use of the Mt. Morris Dam was still undecided. The Mt. Morris Water Power Company and Rochester Gas and Electric were interested in designing the dam so that it could also accommodate hydro-electric power generation. The dam, as planned at the time, would create a reservoir sixteen miles long behind it, ending within approximately 1500 feet of the Lower Falls. The committee members approved of the idea, since it gave them the opportunity to develop more water-centered activities in the park, such as boating and swimming. A final permit was signed between the ASHPS and the Mt. Morris Water Power Company in August 1926. The Mt. Morris Water Power Company bought land around the affected areas of the river for construction, much of which would be given to the park after the dam was built. Surveys were completed along the northern end of today's park to begin to plan for future recreational development. The Letchworth Committee was later approached by the Commonwealth Power Company about building a dam at Portageville, which the company claimed would not affect the flow of water over the falls. After a great deal of discussion the Committee decided that the dam would have an adverse affect on the park and decided not to support the proposal.[84]

The State of New York, through the ASHPS, began purchasing land to the north of Letchworth's 1000 acres in February 1924. The Society intended to develop the land with more picnic grounds, scenic vistas, and roadways. In some cases the members of the Committee purchased land with their own funds and later gave it to New

[82]Ibid.

[83]Letchworth Park Committee Minutes, (March 24, 1926.)

[84]Letchworth Park Committee Minutes, (November 1927.)

York as a gift for the park. One of the important areas for development was Wolf Creek, just south of the village of St. Helena. As early as 1924 the committee was discussing land purchases in the area so that the land could be linked to the rest of the park via a scenic highway. Land acquisition in this area began in 1925, and by the end of the decade this new scenic and recreational area was in full use. The committee also began purchasing land on the east side of the river to permanently protect the scenery of the gorge from development. Long-term plans were already being formed to extend the boundaries of the park to the north on both sides of the river in the area around the proposed dam in Mt. Morris.[85]

Plans for the future of Letchworth Park were proposed by Dr. E.H. Hall, Secretary of ASHPS, to the State of New York in 1923. The Society wanted to expand the park, develop more roads, and expand the recreational opportunities by building campgrounds. The plan was sent to Robert Moses, soon-to-be Chairman of the new State Council of Parks. New vehicle entrances to the park were proposed for the southwest end at Portageville and on the east side of the park leading to a proposed automobile bridge over the Genesee River between the Upper and Middle Falls. The committee also wanted a road built from Inspiration Point to the Lower Falls on the west side of the river. During 1923 the committee built a refreshment stand at the Middle Falls and supplied water and comfort stations to the Lower Falls, where tents were being used at the first campground in the park.[86]

The Rise of the New York State Park System

At the end of World War I the speed of state park development was suddenly intensified. One cause was the increase in automobiles. Now people could easily travel, and the demand for outdoor recreation areas greatly increased. Stephen Mather, Director of the National Park Service, added to the interest in state park systems. In 1921 he organized the first National Conference on State Parks in Des Moines, Iowa. The conference sparked debate and brought out many shared concerns about the parks already in existence and those in the planning stages. The goal of the conference was to encourage state and local governments to acquire and preserve special scenic and natural areas. It also inspired many states to form integrated park systems based on the model of the National Park Service. By the following year wholly new parks were added in twenty states, eight of which had not had any parks the year before. The National Park Service also encouraged the parks and state park systems to initiate master plans for future development of parks. They felt that development should be controlled and designed as a whole, not piecemeal as needs arose. They realized that a holistic approach would lead to more uniform and appropriate development and a less intrusive appearance. From its inception in 1916, the National Park Service had been interested in the development of parks on the state and local levels. The leaders of the

[85] One large scale plan that was not realized for Letchworth State Park in the late 1920s was the development of two parkways proposed by Robert Moses that would run on either side of the Genesee River and connect up to the city of Rochester. One scheme was for a scenic winding parkway running along the west side of the gorge. The other was essentially a speedway placed on the east side of the river. The parkway debate raged on, until finally traditional park roads were developed on both sides of the river. The speedway and parkway ideas stalled and eventually were dropped due to continual debate and arguments and the arrival of the Great Depression.

[86] Most of these plans were implemented, with the major exception of the automobile bridge over the Genesee River at the Middle Falls.

Park Service realized that the federal government could not manage parks at all of the important scenic locations across the country. State and local parks at these locations allowed for the conservation of the resources without burdening the federal government with their upkeep. The formation of state and local parks also took visitation pressures off the limited services at the national parks.

Unlike some states, New York already had a number of state parks by the time the National Conference of State Parks met in 1921. Aside from Niagara Falls, parks had been established at Palisades on the Hudson, Watkins Glen at Seneca Lake, Letchworth, Bear Mountain on the Hudson, and many other sites around the state. All of these parks were established by private individuals who were concerned about development threats to the areas. The parks were given to the state in the hopes that they would be protected from future depredations. However, in many cases private organizations retained control of the day-to-day operations of the parks. This made the oversight of these different parks by the state very difficult, if not impossible.

The New York State Council of Parks, organized by the legislature in 1924, was placed under a new Division of Parks in the State's Department of Conservation. This new legislation provided definite organization for one of the nation's largest and strongest state park systems. It divided the state into regions, each under the charge of an unpaid commission of private citizens appointed by the governor and each with a professional staff, including in most cases at least one landscape architect. The chairmen of the several regional commissions constituted the State Council of Parks, which was responsible for allocation of funds provided by the state's budget.

The first Chairman of the New York State Council of Parks was Robert Moses, who was one of the architects of the legislation establishing the new state park plan. Moses was also appointed the chairman of the Long Island State Park Commission.[87] A member of the Council beginning in 1925 was Franklin Delano Roosevelt, who represented the Taconic State Park Region as its first Commissioner. His home, Hyde Park, was located in this region, and he was well known for his interest in conservation and forestry work on his own estate. The American Scenic and Historic Preservation Society was represented by Dr. George Kunz, President of the Society.

One of Letchworth Park's longtime advocates was Robert H. Treman, who was appointed to the first Council as the Chairman of the Finger Lakes State Park Region. A native of Ithaca, New York, Treman had long been interested in the preservation of scenic wonders in the Finger Lakes. As well as being a member of the ASHPS, he was a wealthy banker who had a long association with Cornell University. Treman bought land around the Enfield Falls and Buttermilk Falls in the Finger Lakes, planted 1,000 trees, and presented the two properties to the state in the 1920s. After his death in 1937 the state of New York renamed Enfield Falls Park the Robert H.

[87]Other members of the first Council were: Alexander McDonald from the Conservation Commission, J. DuPratt White from the Palisades Interstate Park Commission, Robert H. Treman of the Finger Lakes State Park Commission, A.T. Clearwater from Niagara, W. Delavan Baldwin of the Westchester County Park Commission, A.T. Fancher from the Allegany Region, and Henry F. Lutz, the first Recording Secretary. Within a year Harry C. Walker would represent the Central New York State Park Region and Richard S. Persons, the Erie County Park Commission.

Treman State Park in his honor.

The State Council of Parks was formed for a variety of reasons. One of the primary ones was the desperate need for a comprehensive and unified state park plan which would bring all of the disparate sites together so that policies affecting their growth could be formulated. With the growth in population there was an increase in the number of visitors to the parks that were now in operation. Traffic problems and congestion were already issues at some of the parks, and these problems would only get worse in the coming years. Cities were growing dramatically in New York, and their residents were finding a need to escape to the outdoors. The increase in automobiles that were affordable for the average consumer added to the crowds at rural parks, since people could now get in their cars and drive to the parks for the day, instead of needing a long vacation to get there and back. In addition to the crowds, there was a concern about conserving more lands across the state that were potentially threatened by development pressures. The state park plan included suggestions for expanding the existing parks and purchasing new lands for parks in other areas of the state.

As part of the State Council of Parks legislation, Governor Alfred E. Smith proposed a 15-million dollar bond program to improve and expand New York's state parks and historic sites. The bond program passed along with the plan for the State Council in 1924. Letchworth Park received $250,000 of this bond money for expansion northward and construction in the park.

One of Moses's major interests was the development of a parkway system across the state. He wanted all of the parks easily connected to one another and to the urban areas by automobile. He and the other members of the State Council wanted to build a parkway between Rochester and Letchworth State Park, with another parkway connecting it to Buffalo through the Niagara Frontier and a spur road to Allegany State Park. An engineering survey was prepared along the corridor of the Genesee River from Rochester to Letchworth State Park in 1924 to see if this idea was feasible. Discussions of the future development of the park within the context of the construction of the dam were also considered. The State Council and the Letchworth Committee felt that the dam at Mt. Morris would contribute positively to the development of the park and recreational possibilities to the north, particularly due to the flooding of some of the area and the presumed creation of a 15-mile long lake below the Lower Falls.[88]

The ASHPS ceded full control of Letchworth State Park to the state in 1930. The job of operating the park in light of the growing crowds and the administrative headaches was becoming difficult for the Society to handle. In addition, Robert Moses was very determined to remove the ASHPS from any influence in the operation of the

[88]The ASHPS and the Genesee State Park Region continued to talk about the new lake to the newspapers from its inception in the 1920s to the 1940s. Articles were written talking about a 16-mile lake extending almost to the Lower Falls. However, the reservoir was not in the final design plans. While in the 1920s the dam was designed for hydroelectric power, the completed dam was only for flood control. There was no need to hold the water in reserve on a regular basis with a flood control dam, therefore the reservoir was not deemed necessary.

State Council, where they had a seat as stewards of Letchworth. Moses alienated the members of the Society and finally convinced them to cede control of the park.[89] The Letchworth Park Committee proposed the idea of resignation in November of 1929 at a meeting at which:

> The sole subject for discussion at the meeting was the question of the future form of administration of Letchworth Park. The Chairman, Mr. Humphrey, recited recent events in the exchange of views between officers of the American Scenic and Historic Preservation Society and members of the Letchworth Park Committee, regarding the question; and occurrences in connection with conflicts between Dr. Kunz, President of the Society, Mr. Torrey, its Secretary, and Mr. Robert Moses, Chairman of the State Council of Parks, which has brought the matter of the future custody of Letchworth Park into renewed controversy.[90]

The Committee decided that William Letchworth would have approved of its decision, since the state park system had developed and expanded a great deal since he made his gift in 1907, and members were sure that now the state was committed to protecting the natural environment. The trustees of the ASHPS agreed with the Letchworth Park Committee's recommendations for the park's future, and on January 3, 1930, a letter was sent to Governor Franklin D. Roosevelt, tendering the Society's resignation. The State Council of Parks and the New York State Assembly then established a new regional commission-the Genesee Region- in 1930. By this point the park had grown to approximately 6,000 acres.

New York State parks continued to grow in popularity during the twenties, but during the Depression there was a drop in visitation to the state's more rural parks. The State Council of Parks continued to promote the parks, however, as they saw a building up of the parks during the Depression as a way to boost morale by bringing relief from economic pressures. Master plans were made for the parks, including large projects such as parkways and dams to be built once the economy was better. Projects were put on hold indefinitely, both small and large. Only with the assistance of the federal government and the Civilian Conservation Corps were some of the plans implemented before the end of the World War II.

The Great Depression and Letchworth State Park

The Great Depression gripped the United States during the years following the stock market crash of 1929. Soon after his inauguration in March 1933, President Franklin Delano Roosevelt enacted numerous innovative

[89]Moses had difficulties working with the ASHPS at Letchworth and other parks. He wanted total control of the Council and would not stand for any interference. When Raymond Torrey, Secretary of the Society and member of the Council went counter to his orders Moses railed at him, attempted to strangle him, and threw a cigarette stand at him. His only regret, he would say later, was that he had not been permitted to "finish the crackpot." Robert A. Caro, *The Power Broker: Robert Moses and the Fall of New York*. (New York: Vintage Books, 1975), pp. 317-318.

[90]The Letchworth Park Committee to the American Scenic and Historic Preservation Society, November 5, 1929.

programs under "The New Deal." One of FDR's earliest and most successful programs was the Civilian Conservation Corps (CCC). The CCC was designed to help unemployed young men earn money for their families, learn some skills, and assist in the improvement of the natural resources of the United States. Letchworth State Park was a recipient of the time and effort of hundreds of CCC enrollees, and their accomplishments laid the groundwork for future development of the park.

Roosevelt's commitment to conservation began in his childhood at his family's 1200-acre estate in Hyde Park, New York, where his father experimented with forest management. Roosevelt realized that the abundant natural resources of the state could be improved by putting to work young men who, in turn, could help support their families. As a member of the New York State Senate, Roosevelt first tried out the Roosevelt Conservation Camp in 1924 at Palisades Interstate Park along the Hudson River. The program was later expanded to include Taconic State Park. These programs were the testing ground for some of his New Deal programs.

Roosevelt's Civilian Conservation Corps bill passed Congress on March 31, 1933. Roosevelt went to work immediately to work out all the details. The objectives of the CCC were to provide temporary employment for young men, ages 18-25, whose families were in need of financial assistance and to conserve and improve the nation's natural resources. Enrollees received 30 dollars a month, twenty-five of which went directly home to their families. The impact of this money on the communities where the families lived was enormous. The money infused many of these towns and cities with much needed capital to help them to continue to function. The camps themselves spent $5000 a month for supplies in the towns nearby, which was a big boon to these areas as well. The young men were provided with transportation, clothing, food, and shelter, as well as the five dollars per month of their salaries. Enrollees could also learn to read and write, be trained for jobs, and most important, have the opportunity to raise their self-esteem and pride. The United States was able to get these men off the streets, offer them job training, and conserve the nation's resources. An incidental benefit was the military discipline they received, which prepared them for participation in World War II.

Roosevelt selected members of the Departments of Interior, Labor, War, and Agriculture to work on the Advisory Council for the program. Robert Fechner was appointed as National Director of the Emergency Conservation Work Program to oversee the CCC. The Department of the Army was responsible for camp set-up, logistics, and discipline. The Departments of Agriculture and Interior organized and planned the work program. The Department of Labor selected and enrolled the applicants. Within 90 days 300,000 enrollees were put to work. Tasks included clearing underbrush to prevent forest fires; building roads, bridges, paths, and shelters; hooking up water lines; and painting park structures.

Before the camps could be established, the parks needed to list all of the proposed projects, material, and man-hours needed for the improvement of their facilities. Once a report was prepared it was sent to the federal government for review. The scope of work was then summarized in the Proposed Development Scheme then submitted back to the parks.

The work being performed at the parks was reviewed and approved by the CCC division of the National Park Service, as part of the Department of the Interior. The Park Service was concerned about proper development of

their national parks, but they also wanted to assist with the growth of park systems on the local and state levels. To help with the design aspects of the new work parks, the CCC hired landscape architects to work directly with the parks on-site to design recreation areas and preserve natural areas of the parks. This was a great boon to the field of landscape architecture. In 1933 approximately ninety percent of the landscape architects in the United States were unemployed. By 1935, with the arrival and eventual expansion of the CCC, over ninety percent of landscape architects in this country were employed by some form of government in the parks.

While the work of the CCC was a great turn-around for the landscape profession, it did cause some changes in design focus. Since the beginning of the twentieth century most landscape architects had been working on private commissions in the "country place" style. In many cases this style was quite formal and very different from the naturalistic style needed in the parks. Many designers began to recall the work of landscape architects such as Frederick Law Olmsted and A.J. Downing, who promoted the picturesque style. This older style was more appropriate for scenic park design than the current fashionable styles.

All of the camps were organized in a fashion designed by the federal government. The camp was run by a Captain who had engineering or infantry background, who took care of the health, transportation, discipline, housing, feeding, and clothing of all men in camp. Other officers were in charge of specific areas such as mess, welfare, exchange, supply, and transportation. Medical, dental, educational, and spiritual needs were supplied on a regional basis. Civilian supervisors were responsible for the men during the day while they were working in the park. The Camp Superintendent had overall charge of the work program that had been approved by the Departments of Labor and Agriculture. He was assisted by Senior Foremen, Foremen, and technical assistants. The enrollees were also chosen for supervisory positions if they showed leadership ability. A First Sergeant was appointed at each camp to assist the company officer in the daily duty assignments and reporting on enrollee status. Mess and supply Sergeants helped keep the men supplied with meals and uniforms. In addition assistants were appointed for the PX Officer, the Company Commander, and the Educational Advisor.

As with camp staffing, camp design was planned by the federal government. Each camp had a bakery, commissary, mess hall, shower building, supply house, recreation hall, five barracks, a medical building, and officer's quarters. Although they allowed for geographical variation, the camp buildings were ideally set up in a U shape. The structures were wood frame and built from local trees that had been cut at the sawmill. To brighten the area up, sidewalks, lawns, and flowerbeds were laid out near the buildings. The barracks competed for weekly prizes for cleanest and most organized. The recreation areas had items such as radios, phonographs, and records which had been brought by enrollees.

The New York State Council of Parks was very interested in taking part in this program. Most of the parks in the state had been hit hard by the Depression, and while there were plans in place for improving the visitor resources, very few parks had either the money or manpower to implement the designs. The CCC was an ideal solution, and between 1933 and 1941 there were sixty-seven CCC camps in the State of New York.

During the late spring of 1933 Colonel John F. Brown of the United States Army Corps of Engineers toured Letchworth State Park with Charles Van Arsdale, the Secretary-Treasurer of the Genesee State Park

Commission, to see what projects the CCC could do. After reviewing the proposed projects four camps were assigned to Letchworth. The first camp, Great Bend, located on the east side of the river, was opened on June 1933.[91] In the beginning the enrollees lived in Army tents, and their first task was to build more permanent facilities. Forty of the 160 men at Great Bend worked on building the camp, while the others were in engaged in field work around the park. The entrance road to the camp was widened, and water and sanitation lines were installed for the camp. Other crews removed all gooseberry and currant plants in the park. These bushes were believed to spread White Pine Blister Rust to other trees in the park.

Gibsonville Camp was opened in the fall of 1933 with personnel transferred from Camp Adirondack, NY, and Camp Dix, NJ. Assigned to trail and woods clean-up, men from Gibsonville Camp also worked on the main park road in the northernwestern section of the park from Mt. Morris to the Wolf Creek area. The enrollees also worked on the Kisil Point picnic area and the "C" cabin area. They were busy running the gravel and stone quarry in the northwest end of the park which produced the materials needed for road construction. During the winter their primary job was woods clean-up to remove dead trees and brush in hopes of lessening the chance of forest fires. During the warmer months they planted native stock trees and shrubs along the newly constructed roads.

May 1934 brought the opening of St. Helena Camp on the west side of the river, and the development of the central part of the park. Woods improvement, road construction, and development of public areas were performed. Abandoned buildings in the St. Helena area were razed, and over 4700 feet of new road were constructed in the area. A fifty-car parking lot and picnic area were built at St. Helena, and 3000 feet of water line were laid for the comfort station and water fountains nearby. The enrollees also built stone tables and fireplaces, constructed stone walls for the new picnic area at the upper St. Helena shelter, and graded the main park road. Over fifteen miles of new trails were constructed in this region of the park, with twelve log and timber bridges crossing the numerous streams.

The fourth and last camp, Lower Falls, began work in May 1935. This would be the longest lasting CCC camp of the four, not closing until October of 1940. During the time the camp stood on the west side of the Lower Falls the men built the Lower Falls Parkway; established an entrance to the park at Five Corners, near Gardeau; constructed a maintenance road to the campground; built a larger parking lot at the Lower Falls; and built new parking areas at Wolf Creek, Eddy, and Tea Table Areas. There was also a tree and shrub nursery at Lower Falls, which produced over 30,000 plants for landscaping around the park.

In addition to the camp specific projects, all of the groups worked on a number of large projects. This included water storage reservoirs at the Middle Falls, Lower Falls, St. Helena, and Gardeau areas. These would serve as future picnic, cabin, and shelter areas. Other small reservoirs were established at "E" cabins, Wolf Creek, Tea Table, and the Barracks (Parade) grounds. One of the biggest projects was the construction of a footbridge over

[91]This camp was variously known as Great Bend or Big Bend, so named after the curve in the river where the camp was located.

the Genesee River near the Lower Falls. Forty-six feet in length, it is the only crossing of the river within the park by a foot trail. Two quarries, one on the east and one in the northwest end of the park, were established to produce the stone and gravel needed for the roads, trails, steps, and walls. A sawmill, now located near Prospect Home, was built to supply the camps with needed lumber. The logs came from dead trees and those removed for park improvements. Over 300,000 board feet were cut and used in the park for construction work during the eight years of the camps.

The enrollees also assisted in emergencies in the area as they arose. In 1934 the St. Helena men were called to Alabama, New York, to fight a fire in a muck swamp for a week. Gibsonville men escorted a truck going for supplies after a three-day snow storm. In case the truck got stuck, the men were prepared to hand shovel the snow drifts.

Many of the men of Letchworth came from the nearby cities of Buffalo and Rochester. Others came from cities around the country and had a varied ethnic background. Quite often enrollees had no previous work experience and no previous knowledge of military discipline. The young men took advantage of the educational programs offered by the CCC. Aside from basic literacy courses, enrollees could take classes in subjects such as truck driving, employment, courtesy, and current events. Successful completion of these courses earned the men "Unit Certificates." These certificates helped many of the men find jobs when they left the CCC. The enrollees published their own weekly newspapers, which recorded activities such as talent night contests, stories on specific enrollees, athletic contests, and musical reviews. Local news and events were also recorded, as well as information on classes, sporting events, and dances in the nearby towns. Some of the papers from the Letchworth area were called the *Genesee Gazette*, the *Gibsonville Howler*, and the *Spirit of 76*. A few of the young men became camp entrepreneurs, bringing in tattoo machines, pressing uniforms for other enrollees, and printing stationary on the newspaper printing presses.

In the summer of 1936 Great Bend and St. Helena camps closed due to cutbacks ordered by Congress. Gibsonville Camp continued until October 1937, and Lower Falls Camp closed its doors in October 1940. Great Bend later became a camp for the Works Project Administration (WPA)[92], which it remained until August 1942.[93] The CCC era at Letchworth had come to an end after 7 years and innumerable tasks completed. The accomplishments of the CCC have been termed the backbone of Letchworth State Park. Park officials estimate that the program advanced park development by more than ten years. Many of the young men of the CCC went on to serve in World War II, where they found that their years at Letchworth had prepared them for the discipline of the military. At Letchworth, almost all visible traces of the CCC camps have disappeared, with the exception of a chimney or two at Great Bend and Gibsonville; their legacy in the development of Letchworth

[92] The original, and better known, name for this federal program, the Works Progress Administration, was later changed to the Work Projects Administration.

[93] The camp was used to house single veterans in a work-relief effort. Veterans worked 6 hours a day, five days a week, and were provided with clothing and food and received a monthly wage of $36, $20 of which went to their maintenance.

State Park remains visible today in the roads, trails, shelters, comfort stations, walls, trees, shrubs, and parking lots.[94]

Landscape and Architectural Design Philosophy During the CCC Era

Development at state parks during the Depression and World War II was based on the idea that the less intrusion into the natural environment the better. Americans were realizing that their natural environment was disappearing. The new style of landscape design, based on the use of indigenous plant materials and naturalistic principles of design, "...reflected the general nostalgia and sense of loss experienced by a nation that had reached its westernmost limits and which turned inward toward national parks to recapture the experience of wilderness."[95] This was the theory of the National Park Service as well, which promoted the naturalistic design process. Conrad Wirth, Assistant Director of the National Park Service had this to say about the design process:

> He (the designer or architect) may well realize that structures, however well designed, almost never truly add to the beauty, but only to the use, of a park of true natural distinction. Since the primary purpose of setting aside these areas is to conserve them as nearly as possible in their natural state, every structure, however necessary, can only be regarded as an intruder.[96]

State parks around the United States followed the examples set by the National Park Service in park structure and landscape design. In 1935 the Department of the Interior and the National Park Service published *Park Structures and Facilities*, a book of examples of all kinds of park structures, found both in national and state parks. The book was designed to offer ideas on how work could be done that was naturalistic and functional for the park. Emphasis was placed on making a building appropriate for its site, and on the importance of using landscape designers and architects:

> Only reliance on the best professional advice can reasonably insure against structures appropriate in one locality becoming hideous caricatures elsewhere. Only consummate skill and rare good judgement in adaptation can limit the spread of half caste offspring, the very counterfeit exactness of which is pathetic testimony of the bar sinister relationship.[97]

---

[94]CCC alumni continue to meet at the park for reunions on a yearly basis.

[95]Linda McClelland, *Presenting Nature: The Historic Landscape Design of the National Park Service, 1916-1942* (Washington DC: National Park Service, 1993); p. 61.

[96]United States Department of the Interior and the National Park Service. *Park Structures and Facilities*, (Washington DC: United States Department of the Interior, 1935), p. 3.

[97]Ibid., p. 7.

This book was important in the development of state park's structural resources because it offered ideas on how to construct the needed structures and how to adapt them to their setting. Wirth did not want the state parks to be clones of the National Park Service; rather, they should develop their own style based on their geographic resources, cultural heritage, climate, and history.

Wirth, and Herbert Maier, who became the National Park Service's expert on park structures, believed in the use of natural materials that were indigenous to the local environment in the construction of park buildings. They also approved of design styles derived from those used by the pioneers or the native Americans living in a particular region. However, the use of natural materials in the same ways that the pioneers used them was questionable. In many cases original methods involved the use of large quantities of wood, which was part of what the parks were designed to conserve. On the other hand, the original methods were more authentic and less intrusive than modern building techniques. Efforts were made to use half logs over frame walls as siding for the cabins instead of the full logs that would have been used during settlement days. Most of the materials for these building were found in the parks themselves; therefore the effort was made to use fallen and dead trees, rather than the healthy growing foliage in the parks. This argument was not fully resolved by the National Park Service, although the various parks seemed to prefer to use modern methods of construction to achieve a rustic appearance with a veneer of "pioneer-style" architecture. This rustic style of design was both appropriate for the parks and also cost effective, since most of the materials could be found on site and would not involve high shipping or production costs.

Maier wanted park structures to be as inconspicuous as possible. He had suggestions for the parks to hide or camouflage the buildings. The first was simply to use screening, by rocks, trees, or formations, to hide the structures. He encouraged the use of indigenous materials and methods of construction to make the building blend into its environment. Buildings should have low silhouettes and horizontal lines and be naturally colored. Grey and brown paints were recommended, while green rarely was matched and therefore was not advised. Right angles and straight lines should be avoided, as they make a building stand out more prominently. He also suggested making the line of demarcation between the structure and nature as soft as possible with natural plantings and piled stones and rocks.

Landscape architects were vital to the development of the state parks during the CCC era. It was their responsibility to design the master plans for the park. Wirth, then head of the CCC program[98], explained the priorities for state park development. "The object is first to conserve and protect the entire area . . . then to develop only necessary facilities for the enjoyment of each park feature without interfering with the use of other features. The cardinal principle governing all of this is that park areas are to be kept as natural as possible."[99] In many cases this meant the development of roads and trails, planning of campsites, and design of visitor

[98] Colin Wirth was the first and only landscape architect to ever head the National Park System (1951-1964).

[99] Ethan Carr, *Wilderness by Design*. (Lincoln, NE: University of Nebraska Press, 1998), p. 289.

facilities. The master plans typically were made up of a series of maps and drawings to show the style and plans for the development of the park. Some areas were to be left natural, and roads were kept to a minimum, but would allow access to scenic areas of the park. Developed areas were drawn in more detail and were designated as overnight campgrounds, day use areas, and for other specialized uses.[100]

Standard designs were often used for campgrounds, particularly the "Meinecke System," which was designed with specific parking spurs along the campground loop road. E.P. Meinecke was a plant pathologist who studied the impact of heavy use on the vegetation in Sequoia National Park. His concerns about human trampling and soil compaction led to his campground design to limit damaged areas. Logs and boulders were used to mark parking areas to limit automobile damage to the topsoil and ground cover. The design was issued by the Forest Service as *A Camp Ground Policy* in 1932, and it was quickly picked up and used by landscape architects throughout the National Park Service. This pattern can be seen in both the cabin and camping areas within Letchworth State Park.

In planning for the work to be done by the CCC, Wirth and others in the National Park Service felt that recreational development should be emphasized more in the state parks than the national parks. More activities were considered appropriate for state parks, such as swimming, boating, and fishing. State parks, in Wirth's mind, should be considered in two categories: conservation and recreation. The conservation parks should contain outstanding natural scenic areas that attract statewide visitation. Recreation areas were not as obviously worthy of conservation, but they could satisfy the needs of the residents of the area if developed for recreational uses. A park could be used for both conservation and recreation, but the use areas should be kept separated so that recreation would not impinge or damage the conservation sections of the park.

The naturalistic style, or "parkitecture," grew out of the Arts and Crafts movement which had been popularized in England by William Morris and in America by Elbert Hubbard and Gustav Stickley of upstate New York. At the end of the nineteenth century, there was an artistic revolt against the mass production of applied arts. This reform movement developed in response to the deterioration of design and craftsmanship and the use of cheap inappropriate materials. The most famous of the American "guilds" was Hubbard's Roycroft community, founded in East Aurora, Erie County, New York in 1895. One of the most successful reformers of the movement was Stickley, a furniture maker from central New York, who published the monthly magazine, *The Craftsman*, from 1905 to 1916. Stickley promoted the honest expression of structure through exposed structural members, and the use of simple or rustic building materials. The Arts and Crafts philosophy called for simplicity of style, a respectful use of natural materials (wood and stone), with nature itself a source of inspiration, an emphasis on hand-crafted detailing, and the cultivation of regional character. Focus was placed on the use of wood and stone, and on the methods practiced by the early settlers in this country. The use of indigenous materials was often called "rustic architecture" and was popular among state and national parks across the country. It was "...a steadfast search for sensible, simple, and pragmatic solutions that follow

[100] Ibid., p. 269.

function on the one hand and nature on the other." [101] The New York rustic style of architecture, often referred to as the Adirondack style, helped inspire the regionalization of styles promoted by the Park Service to parks around the United States. Parks in New York and neighboring states had been using variations of this style for many years, and this inspired other states to search for their own unique regional designs.

The National Park Service's style was a natural extension of the picturesque style previously used at Letchworth State Park. William Letchworth and William Webster had developed Glen Iris with a romantic, naturalistic plan, adding trees, designing winding paths and vistas, and building stone walls. While their style tended to exaggerate nature around the buildings such as the Homestead and Lauterbrunnen, the scenic vistas and views were left in a natural fashion. This style was similar to the naturalistic style preferred by the National Park and New York State Parks systems. Webster's romantic Swiss chalets and fountains gave way to stone and log shelters and rustic stone water fountains. Charles I. Cromwell of Rochester was the primary park architect during the CCC period. A native of New York, Cromwell was a graduate of Cornell and Syracuse Universities. He trained at J. Mills Platt and C. Storrs Barrows in Rochester, Dwight Baum in New York City, and with Bryant Fleming in Ithaca, New York. Throughout the thirties and forties Cromwell worked as a consulting architect for the park, as well as designing buildings such as the Genesee County Infirmary, the First Presbyterian Church Education Building in Le Roy, and Le Roy Central School.

Park Structures and Facilities found a number of examples of the naturalistic style in Letchworth State Park to admire and included some in its collection. The Adirondack shelters and cabin, particularly the ones designed for Kisil Point and Tea Table Picnic areas, which used logs, fieldstone, boards, and wood shingles, were inspired by a vernacular building tradition used by the early settlers all over New York and New England. Park facility designers at the National Park Service admired the lines of the structures and the additional benefit of not using large amounts of material in their construction. The buildings were hidden among the trees and well screened from the average visitor. Also mentioned in the book were Letchworth Park-designed stone water fountains, entrance gates, benches, and minor vehicle bridges. Most of the materials came from within the park itself. Dead trees, particularly chestnuts, were plentiful, and clearing these trees assisted in protecting the forest from the quick spread of wildfire. A sawmill was built in the park to process the trees as they were removed. The stone was quarried in the park by the men of the CCC camps. Standardized plans such as the Meineke System were used in Cabin Areas B,C,D, and E, which were built by the men of the CCC. Based on drawings and plans of the park during the mid-1930s, Cromwell and various other architects designed master plans for the roads, trails, recreation areas, and camping systems which are still being implemented today.

By the time the United States entered World War II, New York had 74 parks serving 20 million visitors annually. During the war the State Council of Parks tried to help the war effort by providing free admission to the parks for the military and allowing areas of the parks to be used for growing crops.

[101] McClelland, *Presenting Nature*, p. 236.

At the end of the CCC programs in Letchworth, some of the camps were put to a new use housing German prisoners of war who were brought in beginning in 1944 to provide labor during the manpower shortage of World War II. Most prisoners worked either in the fields harvesting crops or in local food processing plants. Letchworth prisoners were employed at the Letchworth Farmers and Canners Cooperative, in nearby fields during the harvest season, and during the winter in maintaining the park itself. Some prisoners also helped build a larger prisoner-of-war camp at Geneseo.

The prisoner-of-war program in western New York was based in Ft. Niagara, north of Buffalo. The fort controlled thirteen branch camps, of which Letchworth was one. The former CCC facilities were adapted for use by the prisoners by adding fences and watchtowers around the camp. From prisoner comments, Letchworth was well-liked because of its natural beauty. It was also one of the few branch camps that had facilities allowing prisoners to live there year round. A total of 200 German prisoners came through the Lower Falls camp beginning on June 24, 1944.[102] The prisoners continued their work at Letchworth until the end of the war in 1945, when most prisoners returned to their homes in Germany. Little notice was taken of the prisoners during their time at Letchworth. They had only slight interaction with most residents in the area, and it is likely that many citizens did not even know they were there.

In addition to the prisoners, other groups rented out the old CCC camps. Snider Packing Company of Mt. Morris leased the Gibsonville camp in 1944 to house female employees of the Birds-eye-Snider Division. Beginning in 1945, the Genesee Park Commission received requests from teachers and groups about renting the camp for two-week intervals for programs.

As early as 1942 the CCC camps were beginning to disappear from Letchworth Park. Great Bend Camp had been abandoned and most of the buildings had already been torn down. In 1946 most of the Lower Falls Camp buildings had been removed to Buffalo to be reconstructed as Veteran's housing. By February 1, 1946, the Army planned for operating CCC camps to be completely gone from Letchworth.

The Post-War Era

After World War II Letchworth State Park continued the land expansion and development plans that had been mapped out in the 1920s. The primary concern during the late 1940s and the early 1950s was the construction of the Mt. Morris Dam. A dam had been under discussion since the end of the nineteenth century and had been approved since the late 1920s. However, the Depression and World War II had limited funds and manpower for such a large-scale project. The Genesee River could be both a gift and a danger to the people who lived in towns along its banks, particularly in Rochester at the mouth of the river. While the Genesee provided water for growing crops, during the spring the snowmelts could cause the river to run well over its banks, particularly south of the gorge. The Mt. Morris Dam was designed to be the solution to the frequent problem of the spring

[102]Betty Rice, "European Immigration into Perry Community, 1940-50," *Historical Wyoming*, XXV No. 1 (July 1978): 17.

flood.

The Mt. Morris Dam

On December 22, 1944, the United States Congress authorized the construction of a flood control dam to be built on the Genesee River, two miles from the village of Mt. Morris. The task was given to the War Department, who then authorized the Army Corps of Engineers to plan and supervise the project. The Army Corps of Engineers originally recommended an earthen dam, with a storage capacity of three inches of run-off. Another proposal was a multi-purpose dam at Portageville to store an additional nine inches of run-off. The final plan, offered in September of 1945 by the Chief of the Army Corps of Engineers, was for a concrete gravity dam able to hold 5.86 inches of run-off. This plan was adopted, and construction began in March of 1948.

The dam was to be located 17 miles down river from the Lower Falls of the Genesee River. This would prevent an adverse physical or visual impact on Letchworth's original 1,000-acre estate. Five contractors worked together to form the Mt. Morris Dam Builders in 1948. During the four years of construction, from 1948 to 1951, 470 men worked day and night during all seasons to complete the project. Rochester reporter Emmett O'Brien wrote, "Man's struggle to harness nature is a raw, bare-knuckle fight against the elements... Nowhere is this more evident than in the Mt. Morris Dam. . . notched into the time-etched highlands of the Genesee River, the dam is expected to halt forever the ravages of flood from the Genesee Country. . . ."[103]

The work on the dam was both difficult and dangerous. The walls of the gorge had to be scaled using wooden ladders and bare hands. Blasting caps were used to widen the walls in some areas to aid in construction. To aid in later construction, a 110 foot headtower was built on the north side bank of the wall and two 45 foot tailtowers were set on the south bank connected by tracks. Cables run between these towers made the work area reachable, and provided a track for the huge buckets of concrete to be moved to the correct spot to fill the block forms. Half of these blocks built into the dam were left lower to allow the river to continue to flow during construction. The twenty-one monolith blocks that make up the dam were designed so that if one fails, the others will continue to hold back much of the river's flow.

Completed in October 1951, the Mt. Morris Dam was built to control 2,476 square miles of watershed. It is 1,026 feet long, 221 feet thick at the base, 246 feet high with training walls to protect the banks from erosion and a downstream stilling basin to calm the water as it exits the dam. It is the largest concrete gravity flood control dam east of the Mississippi River. A gravity dam relies on its weight for its strength to withstand pressure from water and ice in the river. Most of the weight comes from the concrete used to fill the blocks that make up the dam's structure. There is enough concrete in the dam to build a two-lane highway three hundred

[103]Ruth Rosenberg-Naparsteck, "The Sleeping Giant: The Story of the Mount Morris Dam." *Rochester History*, LVIII, No.3 (1996), p. 13.

miles long.[104]

Under normal conditions the Mt. Morris Dam does not hold back any of the water from the Genesee River, making it a dry dam. Only during severe flooding does the dam create a reservoir upstream. The project cost close to twenty-five million dollars and even before it was completed it had proved useful. In 1950 the floodwaters rose once again, but the partially completed structure prevented damage to the towns and cities down river from Mt. Morris.

The worst flooding threat after the construction of the dam occurred in 1972 as a result of Hurricane Agnes. The huge storm caused a front to stall over the river basin for 4 days, dropping between seven and sixteen inches of rain in Western Pennsylvania and New York. The dam was filled to ninety-six percent capacity, or close to 756 feet above sea level. The dam held firm and slowly released the collected water at a safe rate.

An additional part of the 1944 Flood Control Act was, " ...to construct, maintain, and operate public park and recreation facilities in reservoir areas."[105] In the 1950s and 1960s the land around the dam was developed to provide facilities for the hundreds of thousands of visitors to Letchworth State Park each year. The original section of the park, centered around William P. Letchworth's gift to the state, was being over-used by nearly 430,000 annual visitors in 1951. Enclosed shelters, picnic tables and grills, swimming pools, locker rooms, comfort stations, a restaurant at the dam overlook, new roads, and parking areas were all added to enhance this area in expectation of increased visitation to the newly opened northern end of the park. The Genesee State Park Commission continued to add more land around the dam and the river in accordance with the plans set up in the 1920s to enhance the visitor's experience at Letchworth State Park. Attendance at Letchworth continues to grow, just as it has throughout the state park system. In 1946, when the park was just 6,000 acres, the annual visitation was approximately 125,000. With the addition of the land around the Mt. Morris Dam, and the continued increase in leisure time and mobility, the park's attendance shot up to 430,000 in 1951. Today the park estimates that over 1.2 million people visit the park annually.

New York State Parks after World War II

From its inception, the New York Department of Conservation had been responsible for managing New York's state parks. After the war, a new emphasis was placed on adding acreage to existing parks, including Letchworth, and establishing new parks. The New York State Council of Parks wanted the parks to supply a variety of recreational opportunities, particularly on the water. With the end of the war people had more leisure time and were much more mobile. People flocked to the parks in record numbers. The roads and facilities in the

[104] Rosenberg-Napersteck and Curtis, Jr., *Runnin' Crazy*, p. 119.

[105] Department of the Army, *Mount Morris Dam Master Plan*: 1-2.

parks were in many cases inadequate to handle the crowds.[106]

The end of the war signaled a change in focus in the area of recreation. At the beginning of the twentieth century the park was mostly a place for sightseeing and driving tours. This kind of recreation, know as passive recreation, required comfort stations and shelters be built, but the main park need was for good roads. Visitors commonly used the park as a site to visit during the day, then return home at night. Often visitors arrived by train and returned to cities such as Buffalo or Rochester the same evening. After the war, the park was a site for family vacations, and with the increase in the number of automobiles, more families could come and stay for a week at a time. Facilities were needed to accommodate the influx of people, and the people who came expected to be entertained. Cabins were built, pools, restaurants, and camping areas abounded, and the necessary buildings such as shelters and comfort stations increased. More trails were designed for visitor use, and new roads were designed for moving visitors around the park, not offering them spectacular views as they drove.

In 1949 there were 78 state parks in New York State. Through the 1950s the parks continued to be expanded, and new parks were added as well. In 1959 New York parks saw over 31 million visitors annually-almost twice the population of New York State. A large bond grant for land acquisition was passed in 1960, pushed by Governor Nelson Rockefeller, who was a big supporter of the park system. Upon introduction of the bond, Rockefeller remarked:

> Simply stated, our people need more outdoor living space. Wise, far-sighted provisions must be made to get it. Outdoor recreation is no longer a luxury. I do not need to belabor the importance and immediacy of the challenge which we face. Only a bold stroke and a major investment can save some of the remaining lands and waters for urgently needed outdoor recreation.[107]

The late sixties brought about a restructuring of the park system. In 1966 the Historic Sites Division moved to the Council of Parks, first as part of the New York State Historic Trust, and then under the title of the Division for Historic Preservation in the Office of Parks and Recreation. The State Council of Parks became the State Council of Parks and Outdoor Recreation in 1967, which stressed the recreation side of the system. Today the Office of Parks, Recreation, and Historic Preservation is a full-fledged agency under the Executive Office.

By 1962 the State Council of Parks was responsible for 102 sites scattered across New York state. By 1973 the number had grown again to 139 state parks. Attendance in 1970 was over 47 million people annually. Today there are 152 state parks with over 70 million visitors enjoying the variety of scenery in New York State.

---

[106]Traffic problems had plagued Letchworth State Park since before the Depression, due to a lack of space in the park and few roads in and out of the park. In 1927 an annual agricultural picnic was rained out, and the resulting crush of cars led to a back-up of at least an hour for participants attempting to get out of the park.

[107]*Fifty Years: New York State Parks, 1924-1974* (Albany, NY: Natural Heritage Trust), n.p.

The Mission 66 Era

After the CCC building efforts, the National Park Service began re-examining the designs it was using. A number of schools of thought developed, all with their own theories about the evolution of park structures. Park designers such as George Nason began to feel that the naturalistic style was valuable, but the use of pioneer and indigenous building techniques was wasteful of materials and did not last a long time in the parks due to weathering and insect infestation. The use of natural materials was good, in his opinion, but these were costly to maintain, outmoded, and diminished resources already depleted by the CCC. In his opinion "The precedent of the past decade may be already outmoded, unnatural, and inappropriate to modern man. . . . Well conceived, well built, modern buildings are milestones in the progress of architecture."[108]

Richard Lieber, former head of Indiana State Parks, espoused a different theory. He felt that the less intrusion of buildings into the park the better. Structures such as administration buildings, visitor centers, hotels, and restaurants should be placed on the edges of parks, or else outside the park boundaries. He felt that park designers should let nature "restore her own balances."[109] He did not believe in parkways, rather, there should be minimal park roads running through the constructed areas of the park. Wild areas should be kept natural if at all possible. This was a move away from any previous philosophy of park design. While in the 1920s the parks were not being highly developed with cabins and visitor facilities, roads were designed to offer the best possible views, and the buildings were placed near scenic spots. Leiber preferred the visitors see a completely unspoiled view without man-made intrusions at all. This philosophy, while commonplace today, went against all previous park design philosophies of the nineteenth and twentieth centuries.

Lieber's ideas did not find favor once World War II was over. The move was on to develop the parks for the growing influx of visitors. In 1955 the National Park Service initiated a new program entitled Mission 66. The program was designed to improve the parks in preparation for the fiftieth anniversary of the National Park Service in 1966. Mission 66 emphasized active recreational use of the parks over preservation of the natural scenery. The plan was to build a number of modern facilities using current methods of landscape and architectural design. By using modern materials and techniques more buildings could be built at the parks for the same money as one parkitecture structure. The picturesque was rejected, and architects experimented with glass, concrete, and steel. The buildings were designed to be sturdy, low maintenance, permanent structures. Along with this movement was the arrival of the modern visitor center concept. A new idea at the time, the visitor center was designed to be the center of interpretive activity for the park. The buildings would have exhibits, brochures, and staff to guide visitors to their desired destinations. Large numbers of visitors were also accommodated with large parking areas and open spaces for picnics and sports.

[108] Linda Flint McClelland, *Building the National Parks*. (Baltimore, MD: Johns Hopkins University Press, 1998), p. 456.

[109] Ibid., p. 457.

Following World War II the design emphasis also changed in Letchworth State Park. While landscape and resource conservation were the primary goals during the preceding eighty-five years, the increase in visitation brought about a strong interest in serving recreational needs. New structures were being constructed to serve visitors, such as cafeterias, swimming pools, additional comfort stations and cabins, and more roads throughout the park. While some effort was made to build the structures in a naturalistic manner, more emphasis was placed on the functionality and efficiency of the buildings and the park roads. Cabins were roofed with asphalt shingles instead of wood shingles. Steel and concrete were used as the primary materials for recreation buildings such as the pools, poolhouses, cafeterias, and pavilions. These structures were not designed to visually or physically fit into their surroundings, unlike the earlier CCC-built facilities. The most noticeable example of this trend is the Highbanks Recreation Area, which is designed primarily of glass, metal, tile, and laminated wood. The Highbanks Recreation Area buildings represent the influence of Modernism in park design in the years following World War II. Changes in building technology and materials resulted in a new aesthetic. The Highbanks buildings illustrate technological advances in steel framing, reinforced concrete, and prefabricated components of post-war era. These buildings lie on top of the landscape, rather than being integrated into it. The nearby main park road is also built on top of the plateaus in the north end of the park, rather than easing through the area behind a screen of trees and banks, as it did in the south end. This difference is particularly noticeable near the Wolf Creek Area.

While Letchworth State Park did not build a new building to house a visitor's center, as was popularized by the Mission 66 movement, new efforts were made to accommodate visitors a various sites in the park. A new food concession and information area near the Mt. Morris Dam was originally a concrete testing building for the dam construction. The Administration Building was used to make cabin reservations and pick up maps of the park, and the Pioneer and Indian Museum was used to introduce visitors to the varied history of the area.

Conservationists of the late 1950s and early 1960s criticized the new design methods of Mission 66 and the drive to bring more visitors to the parks. They felt that the more visitors who used the parks, the more damage that would be done to the ecology of the parks themselves. The new structures, such as pool facilities, more campgrounds, expanded road systems, and visitor centers were designed to facilitate an increase in visitation. The concerns of these conservationists became known as the Wilderness Movement. Wilderness was defined as "an area where earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain."[110] The recreational increase, the building of new structures, and the influx of visitors were all damaging to the parks. In 1963 Aldo Leopold, a well respected conservationist stated that in National Parks, "the maintenance of naturalness should prevail."[111]

By the late 1960s the National Park Service was beginning to re-examine the naturalistic movement of the 1930s. Master planning for the recreational and environmental concerns of the parks was once again an

[110]McClelland, *Building the National Parks*, p. 475.

[111]Ibid., p. 477.

important factor in park design. Roads were built where necessary, but they were designed to lay lightly on the ground and not to permanently damage the ecology of the parks. Historic structures in the parks started to be studied after the passage of the National Historic Preservation Act in 1966. The impact of any new structure in the parks was being studied before it was being built. The naturalistic style has remained popular as the neo-rustic style through the seventies and eightics and on into the 1990s.

Letchworth State Park and the lands it encompasses have changed and grown through the many centuries. The influence of Native Americans, settlers, William Letchworth, the ASHPS, the CCC, and the Genesee State Park Region can all be seen in the park, which today welcomes 1.2 million visitors annually. The wide variety of significant historic trends, figures, and designs have left their mark on this remarkable historical park.

(Cont'd from cover sheet)

Designers/Architects/Engineers/Landscape Architects

Letchworth, William P.
American Scenic and Historic Preservation Society
Genesee State Park Region
U.S. Army Corps of Engineers
Bush-Brown, Henry K.
Cromwell, Charles I.
Morison, George S.
Mott, Charles
Oakey, A.F.
Phillips, Edward A.
Webster, William

Builders/Contractors

American Scenic and Historic Preservation Society
Genesee State Park Region
Civilian Conservation Corps
U.S. Army Corps of Engineers
Albert Lindquist & Co.
Attica Prison labor
Berhite, William
Gath, N.H.
Ingersoll, Charles
M.E. Colle, Inc.
Palmer, Alvah
Smith, Michael

9. Bibliography

"Bright Future Forseen for Letchworth." Lois Dawson, Perry Herald, October 11, 1962.

"'Scoop' Morrison Uncovers Story of Civil War Veterans Monument at Park." Perry Herald, July 6, 1961.

"The 50th Anniversary Reunion of the Civilian Conservation Corps in Letchworth State Park." Flyer, 1983.

American Scenic and Historic Preservation Society Collection, Rare Books and Manuscripts Room, New York Public Library, New York City.

Anderson, Mildred Lee Hills. Genesee Echoes: The Upper Gorge and Falls Area From the Days of the Pioneers. Dansville New York: F.A. Owens Publishing Company, 1956.

Anderson, Mildred Lee, The Genesee Valley Canal 1836-1878. N.p.: n.p., 1978

Anderson, Mildred Lee. Gibsonville, The Vanished Village. Dalton, New York: Burt's Printing Service, Inc., 1976.

Anderson, Mildred Lee. School Days in Genesee Falls. N.p.: n.p., 1984.

Anderson, Mildred Lee and Marion Piper Willey. St. Helena Ghost Town of the Genesee, 1797-1954. Dalton, New York: Burt's Printing Service, 1970.

Barnes, Katherine. Rainbow's End: The Story of Letchworth Park. Perry, New York: Moxon Printing, 1967.

Beale, Irene A. William P. Letchworth: A Man for Others. Geneseo, New York: Chestnut Hill Press, 1994.

Beale, Irene. Genesee Valley Events, 1668-1986. Geneseo, New York: Chestnut Hill Press, 1986.

Birnbaum, Charles A. and Julie K. Fix, ed. Pioneers of American Landscape Design, Volumes I and II. Washington, D.C.: United States Department of the Interior, 1995.

Bodner, Connie Cox. The Development of Nineteenth-Century Agricultural Practices and Their Manifestations in Farmsteads in the Genesee Valley. Rochester, New York: Cultural Resource Survey Program, Rochester Museum and Science Center, 1990.

Caro, Robert A. The Power Broker: Robert Moses and the Fall of New York. New York: Vintage Books, 1975.

Carr, Ethan. Wilderness by Design. Lincoln, Nebraska: University of Nebraska Press, 1998.

Clepper, Henry. Origins of American Conservation. New York: Ronald Press Company, 1966.

Condit, Carl. American Building Art, The Nineteenth Century, New York: Oxford University Press, 1960.

Cook, Thomas. A History of Letchworth State Park. Genesee State Park and Recreation Commission, November 1978.

Cranz, Galen. The Politics of Park Design. Cambridge, Massachusetts: The MIT Press, 1982.

Crawford & Stearns Architects and Preservation Planners, Historic Structure Report: Caneadea Council House, Letchworth State Park, Castile, New York. Syracuse, New York, August 1995.

Crawford & Stearns Architects and Preservation Planners, Historic Structure Report: Nancy Jemison Log Cabin, Letchworth State Park, Castile, New York. Syracuse, New York, September 1995.

Crawford & Stearns Architects and Preservation Planners, Historic Structure Study: The Glen Iris Inn, Syracuse, NY, 1988.

Doell and Doell Garden Historians and Landscape Preservation Planners, The Preliminary Historic Landscape Assessment for the Council House Grounds, Syracuse, New York,1994.

Fifty Years: New York State Parks, 1924-1974. Natural Heritage Trust, Albany, New York. 1975.

Fink, Daniel. Barns of the Genesee Country, 1790-1915. Geneseo, New York: James Brunner Publisher, 1987.

Gardner, Robert. "The Civilian Conservation Corps Trilogy." State University of New York- Geneseo research paper, 1981.

George W. Curry and Associates. The Council House Grounds Landscape Preservation Plan, Syracuse, New York, 1996.

George W. Curry and Associates. The Homestead Grounds Landscape Preservation Plan, Syracuse, New York, 1997.

Good, Albert. Park Structures and Facilities. Washington, D.C.: United States Department of the Interior, 1935.

GZO GeoEnvironmental of New York. Phase I and Phase II Cultural Resource Investigation for the Akzo Nobel Salt Inc. Mining Permit Application Project Towns of Groveland, Geneseo, and Leicester, Livingston County. July 1995.

Hamilton, Edward A. "The Civilian Conservation Corps at Letchworth State Park 1933-1941." Master's thesis, Slippery Rock University, 1984.

Hand, Captain John W., Historical Sketch of the 136th Regiment, N.Y.V.I.

Herschensohn & Reed Associates. Historic Building Survey of the Finger Lakes and Genesee State Park Region. April 1983.

History of Wyoming County, NY. New York: F.W. Beers and Company, 1880.

Howland, Henry R. The Caneadea Council House and its Last Council Fire. Castile, New York: Letchworth State Park, 1932.

Larned, J.N. The Life and Work of William Pryor Letchworth. New York: Houghton Mifflin Company, 1912.

Mazuzan, George T. and Nancy Walker. "Restricted Areas: German Prisoner-of War Camps in Western New York, 1944-1946." New York History, January 1978, 55-72.

McAlester, Virginia and Lee. A Field Guide to American Houses. New York: Alfred A. Knopf, 1985.

McClelland, Linda Flint. Building the National Parks. Baltimore: The Johns Hopkins University Press, 1998.

McClelland, Linda Flint. Presenting Nature: The Historic Landscape Design of the National Park Service, 1916-1942. Washington DC, National Park Service, 1993.

Mitchell, Lee Clark. Witness to a Vanishing America. Princeton, New Jersey: Princeton University Press, 1981.

Newton, Norman T. Design on the Land. Cambridge, Massachusetts: Harvard University Press, 1976.

Parks and Parkways for the Genesee State Park Region, New York. St. Louis, MO: Harland Bartholemew & Associates, City Plan and Landscape Engineers, February 1932.

Pregill, Philip and Nancy Volkman. Landscapes in History. New York: Van Nostrand Reinhold, 1993.

Rice, Betty. "European Immigration into Perry Community, 1940-50," Historical Wyoming, XXV No.1, July 1978.

Rosenberg-Narparsteck, Ruth. "The Sleeping Giant: The Story of the Mt. Morris Dam." Rochester History Vol. LVIII, No. 3, Summer 1996.

Rosenberg-Napersteck, Ruth and Edward P. Curtis, Jr. Runnin' Crazy: A Portrait of the Genesee River. Virginia Beach, Virginia: The Donning Company/Publishers, 1996.

Seaver, James E. A Narrative in the Life of Mary Jemison. Canandaigua, New York: American Scenic and Historic Preservation Society, 1925.

Sir Banister Fletcher's A History of Architecture. Edited by John Musgrove. London: Butler and Tanner, 1987.

Smith, Frank E. Editor. Conservation in the United States: Land and Water, 1900-1970. New York: Chelsea House Publishers, 1971.

Smith, Frank E. The Politics of Conservation. New York: Random House, 1966.

[Smith, James H.] History of Livingston County, NY. Syracuse, NY: D. Mason and Company, 1881.

Tilden, Freeman. State Parks: Their Meaning in American Life. New York: Alfred A. Knopf Publishers, 1962.

URS Greiner Consultants, Inc. Mount Morris Dam Master Plan. Department of the Army, Army Corps of Engineers- Buffalo District. June 1, 1998.

VanValkenburgh, Norman J. Land Acquisition for New York State. Arkville, New York: The Catskill Center for Conservation and Development, Inc., 1985.

Vertical Files in the Administration Building, Letchworth State Park, Castile, New York. The historical files contain primary and secondary source materials, bibliographies, indexes, correspondence, etc.

Webster, William. "An Ornamental Farm," Moore's Rural New Yorker. Volume 12, March 16, 1861.

Whiffen, Marcus. American Architecture Since 1780. Cambridge, Massachusetts: M.I.T Press, 1969.

Willard, Kenneth, Assemblyman, "Livingston County Training Camps in the Civil War." speech delivered at the Livingston County Historical Society meeting, November 5, 1961, Geneseo, NY.

"William Webster Dies at Age of 94 Years," Union and Advertiser, Rochester, New York, March 9, 1911.

Letchworth State Park
Name of Property

Wyoming and Livingston Counties, New York
County and State

10. Geographical Data

Acreage of Property 14,345 acres

UTM References (cont'd)
(Place additional UTM references on a continuation sheet.)

	Zone	Easting	Northing
1	18	264151	4720277
2	18	264055	4735524
3	18	263132	4711414
4	18	262060	4737189

Verbal Boundary Description
(Describe the boundaries of the property on a continuation sheet.)

Boundary Justification
(Explain why the boundaries were selected on a continuation sheet.)

11. Form Prepared By

name/title Stacia L. Partin

organization NYS OPRHP Field Services Bureau date May 15, 2000

street & number Peebles Island, P.O. Box 189 telephone (518) 237-8643 ext. 3265

city or town Waterford state NY zip code 12188-0189

Additional Documentation

Submit the following items with the completed form:

Continuation Sheets

Maps

A **USGS map** (7.5 or 15 minute series) indicating the property's location
A **Sketch map** for historic districts and properties having large acreage or numerous resources.

Photographs

Representative **black and white photographs** of the property.

Additional items
(Check with SHPO or FPO for any additional items)

Property Owner (Complete this item at the request of the SHPO or FPO)

name _____

street & number _____ telephone _____

city or town _____ state _____ zip code _____

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C. 470 *et seq.*)

Estimated Burden Statement: public reporting burden for this form is estimated to average 18.1 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Chief, Administrative Services Division, National Park Service, P.O. Box 37127, Washington, D.C. 20503

10. Geographical Data

UTM References

Easting / Northing

5. 262436 / 4732367
6. 260868 / 4730341
7. 260692 / 4729864
8. 259525 / 4728264
9. 258565 / 4727204
10. 257323 / 4724895
11. 256181 / 4722774
12. 254989 / 4719330
13. 256219 / 4718269
14. 253339 / 4718006
15. 250522 / 4717422
16. 250553 / 4718595
17. 250333 / 4717291
18. 248878 / 4717328
19. 249028 / 4719555
20. 250685 / 4720754
21. 251638 / 4721852
22. 251990 / 4722843
23. 253690 / 4723320
24. 254161 / 4725020
25. 255360 / 4727078
26. 256162 / 4728659
27. 257505 / 4731483
28. 259268 / 4732706
29. 259983 / 4734287
30. 263509 / 4736119
31. 263992 / 4736025

Boundary Description

The boundaries of this property match the current boundaries of Letchworth State Park, which includes 14,350 acres on both sides of the Genesee River in Wyoming and Livingston Counties. The outline of the district is outlined in black on the accompanying maps.

Boundary Justification

Letchworth State Park encompasses 14,350 acres of land on both sides of the Genesee River. While the original estate only consisted of approximately 1,000 acres, from the 1920s the American Scenic and Historic Preservation Society and the state of New York were planning on expanding the park to encompass the high banks of the gorge from the Portage Falls to Mt. Morris. Planned construction of the Mt. Morris Dam led to the purchase of land by the federal government for the dam's flood plain. This land was to be given or leased to the state of New York once the dam was completed. Development projects for the road system and eventual recreational development on this newly acquired land went forward during the Depression and World War II years. This land was handed over to the park in the early 1950s. By 1952 most of the land that makes up today's Letchworth State Park had been purchased or given to the state of New York. Scattered parcels were purchased in the late 1950s and early 1960s to complete the park's goals of protecting the gorge and the viewshed from

Portageville to the Mt. Morris Dam. These later purchases of land on either side of the river were almost all included in long range plans beginning in the 1920s.

The purchase of the contiguous land surrounding the seven intact Genesee Valley Canal locks closest to the park in 1978 connects historically with the development of the land within the park during the settlement period. These locks demonstrate the technology used to expand trade and economic opportunity in the Genesee Valley during the nineteenth century. Only seven of the locks were purchased, due to the fact that the locks further from the park are not in good condition or have been torn down.

11. Additional Documentation

Photographs

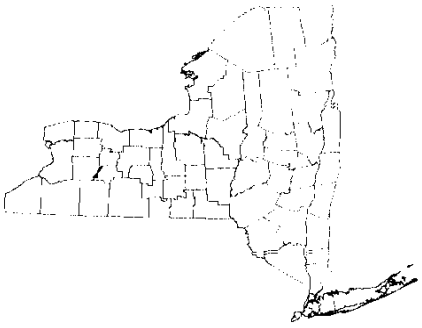
Letchworth State Park
Wyoming and Livingston Counties, New York
Photographer: Kathleen Howe
April 28, 1999-October 27, 1999
Negatives: NYS OPRHP, Field Services Bureau
(Note: The resources shown in these photos have not been altered since 1999)

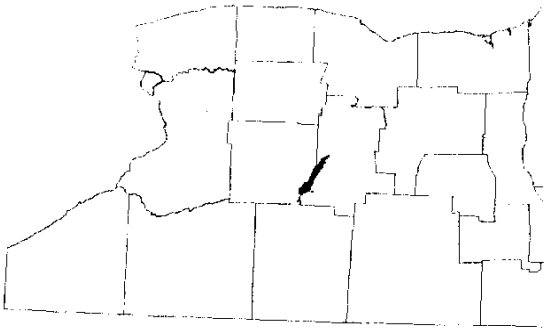
1. View of the Erie Railroad Bridge and Upper Middle Falls Picnic Area, looking south
2. Shelter #6 at Upper Middle Falls Picnic Area
3. Shelter #6, interior view, at Upper Middle Falls Picnic Area
4. Comfort Station #3 at Upper Middle Falls Picnic Area, looking southwest
5. Stone water fountain near comfort station #3, looking northwest
6. (Upper) Upper Middle Falls Picnic Area showing stone picnic tables, looking south
7. Pavilion #5 at the (Upper) Upper Middle Falls Picnic Area, looking southwest
8. Comfort Station #2 at the (Upper) Upper Middle Falls Picnic Area, looking southwest
9. Overlook A at Upper Falls trail, looking south
10. Stone Bridge at overlook C, Upper Falls Trail, looking southwest
11. Upper Falls Trail- stone posts and rails, looking north
12. Footbridge and overlook at De-ga-wa-nus Creek Bridge, Upper Falls Trail
13. Middle Falls, looking south from in front of the road by the Glen Iris Inn
14. Stone wall/steps leading to the Glen Iris Inn, looking southwest
15. Glen Iris Inn, looking northwest
16. Glen Iris Inn, front (northeast) parlor
17. Glen Iris Inn Hall
18. Goldfish pond with fountain, looking east
19. Pioneer and Indian Museum and comfort station at rear
20. Front entrance to Pioneer and Indian Museum
21. Pioneer and Indian Museum interior, north room
22. Stone steps leading up from museum to Council House Grounds Area, looking southwest
23. Council House Grounds Area- Caneadea Council House, looking northeast
24. Council House Grounds Area- Nancy Jemison Cabin, looking southeast
25. Council House Grounds Area, looking east
26. Council House Grounds Area- Mary Jemison Statue and Monument, looking north
27. Dragoons Monument, Lauterbrunnen Area, looking east
28. Lauterbrunnen House with ice house, looking southeast
29. Lauterbrunnen House, looking south
30. Stone vase in yard, Lauterbrunnen House

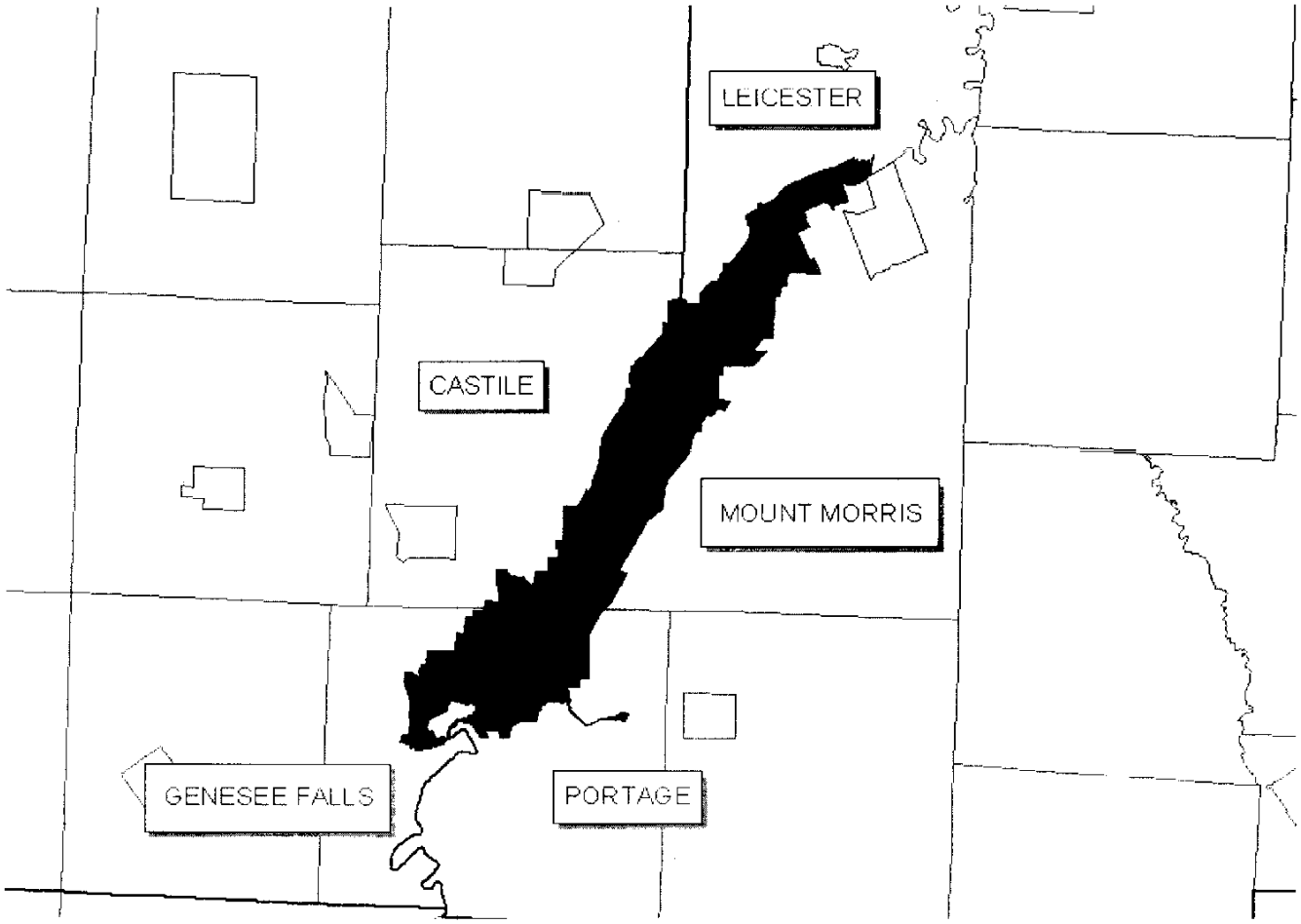
31. Park House #16 at Lauterbrunnen Area, looking west
32. Lauterbrunnen Barn, looking south
33. Commission House, looking northwest
34. Commission House interior
35. Police garage east and north elevations, South Maintenance Area, looking southwest
36. South Maintenance Area garages on north side, looking northwest
37. Pioneer Cemetery, Trout Pond Road Area, looking southwest
38. #27 Storage Garage on Trout Pond Road, looking west
39. Trout Pond, looking east
40. Trailside Lodge, looking southwest
41. Inspiration Point Area, showing pond, paths, and bridge, looking east
42. View of Middle Falls from Inspiration Point Area, looking south
43. Comfort Station #30 looking northeast, Inspiration Point Area
44. Stone House at Inspiration Point Area, looking west
45. Administration Building, Labor Center/Administration Area, looking northeast
46. Prospect House barn, now Central Stores, Labor Center/Administration Area, looking east
47. Prospect House, Labor Center/Administration Area, looking east
48. #39 Carpenter's Shop, Labor Center/Administration Area, looking southwest
49. Sawmill, and lumberyard at Labor Center/Administration Area, looking west
50. Row of trees leading to Prospect House, Labor Center/Administration Area, looking west
51. CCC cabins behind Carpenter's Shop and Greenhouse, Labor Center/Administration Area, looking south
52. Detail of cabin construction, Labor Center/Administration Area
53. Octagon Stand #186, Lower Falls Footbridge Area, looking east
54. Stone wall behind the Octagon Stand, Lower Falls Footbridge Area, looking east
55. Comfort Station #184, Lower Falls Footbridge Area, looking southwest
56. Stone hearth below Pavilion #188, Lower Falls Footbridge Area
57. Bench below Pavilion #188, Lower Falls Footbridge Area, looking northwest
58. Lower Falls Trail, looking south
59. View of Lower Falls Bridge/ Genesee River looking southeast
60. Lower Falls, view from Lower Falls Trail, looking south
61. Lower Falls Footbridge, looking south
62. Cabins B1, B2, Cabin Area B
63. Comfort Station, Cabin Area B
64. Cabin B14, B15, Cabin Area B
65. Lower Falls Pool Area, looking west
66. Lower Falls Restaurant, Lower Falls Pool Area, looking south
67. Bathhouse, Lower Falls Pool Area, looking north
68. Lower Falls Pool Area- Picnic Pavilion #189, looking southwest
69. Cabins A14, A13, Cabin Area A
70. Cabin A21, Cabin Area A
71. Wolf Creek picnic tables, Wolf Creek Area, looking south

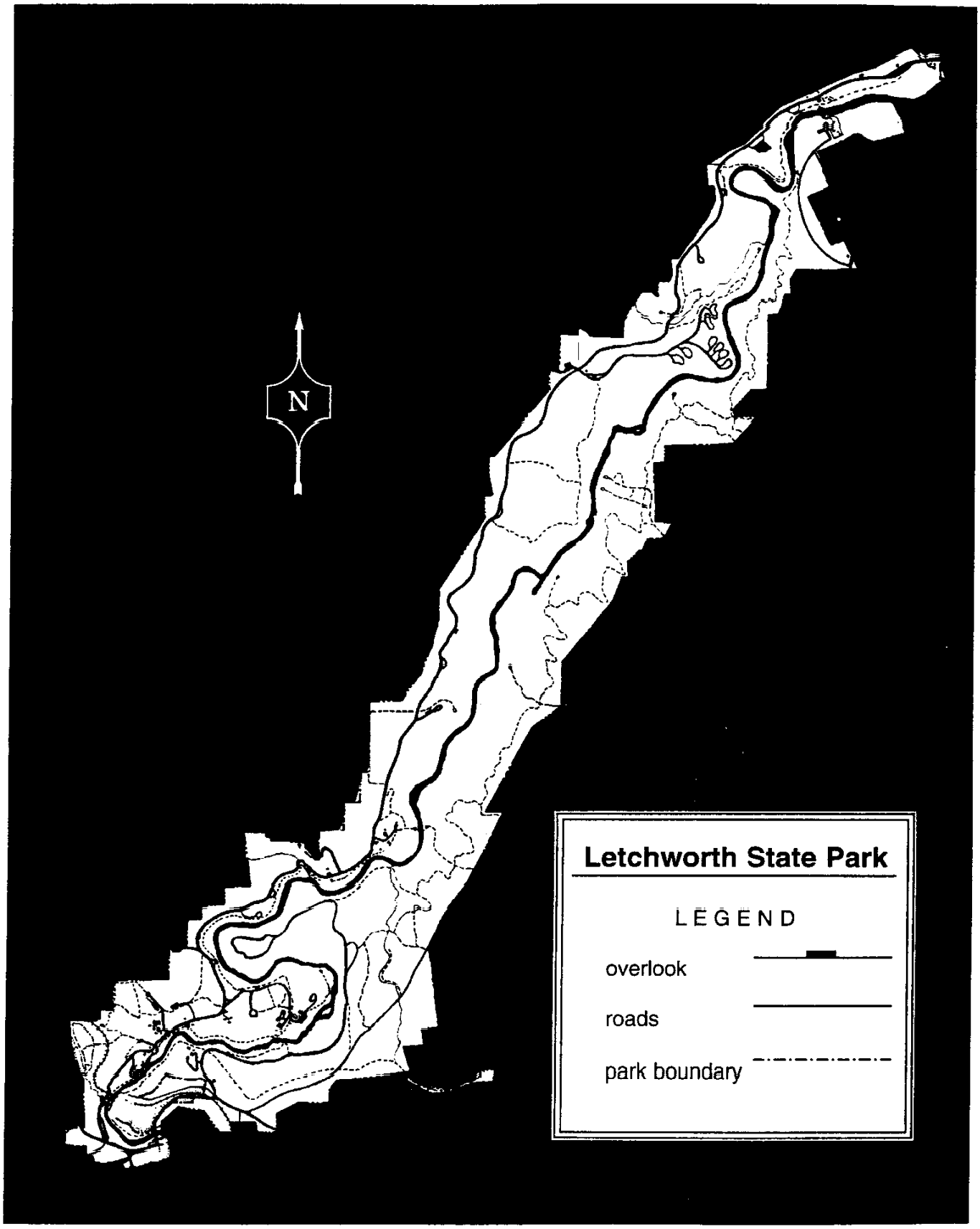
72. Stone (road) and Bridge at Wolf Creek Area, looking west
73. Stone steps at Wolf Creek Area, looking south
74. Comfort Station at Wolf Creek Area, looking southwest
75. Comfort Station- Eddy's Picnic Area, looking west
76. Pavilion #119 at Eddy's Picnic Area, looking northwest
77. Shelter at Tea Table Picnic Area, looking north
78. View of the gorge from Tea Table Area, looking south
79. St. Helena A Area, #118 picnic pavilion, looking southeast
80. St. Helena C Area, parking lot, looking south
81. Littledyke House Area, looking east
82. Perry Entrance Area, Contact Station #48, looking west
83. Check-in building #52 for Highbanks Camping Area, looking east
84. Comfort Station #54, recreation Building #55, Highbanks Camping Area, looking north
85. Typical camp site, area 5, Highbanks Camping Area
86. Kisil Point Area, Kisil Point Shelter #106, looking west
87. Cabin C5, Cabin Area C
88. Cabins C17, C16 (L to R), Cabin Area C
89. Cabins C9 (l) , C8 (r), Cabin Area C
90. Caretakers House #104, Camping Registration Area, looking east
91. Highbanks Recreation Area, bathhouse #88, looking north
92. Highbanks Recreation Area, grandstand/filter building #87, looking east
93. Highbanks Recreation Area, Concession Building #86, looking west
94. Highbanks Recreation Area, Picnic Shelter #81
95. Highbanks Recreation Area, Picnic Shelter #81, interior
96. Highbanks Recreation Area, park police building #85, looking south
97. Highbanks Recreation Area, picnic shelter #80, looking southeast
98. Shelter #102 at Conlon Point Area, looking north
99. View from Conlon Point Area, looking southwest
100. Shelter #100 at Dam Overlook Area, looking east
101. #99 Concession and #98 Comfort Station at Mt. Morris Dam Area, looking north
102. Mt. Morris Dam, looking east
103. Quonset Hut #91, wood bin #217, cabin #75, Quonset Area, looking south
104. Contact station #93 at Mt. Morris Entrance Area, looking north
105. North Residence Area- house #95, garage #94, looking east
106. Cabin D2, Cabin Area D, looking northeast
107. Cabin D8, Cabin Area D, looking west
108. Boulder/marker at Parade Grounds Area, looking southeast
109. Parade Grounds Area shelter #191, looking northeast
110. Cabin Area E, Cabins E7, E6, E5, looking southeast
111. Federal Dam Area, Visitor Center, looking north
112. Federal Dam Area, turret, looking northwest

113. Sign for Block 44, Arboretum
114. Squawkie Hill area from overlook
115. Gardeau Flats from Gardeau Overlook, looking northeast
116. Chimney at former Great Bend CCC Camp
117. Dehgayasoh Creek bridge, looking west
118. Bridge over unnamed creek, looking west
119. Silver Lake Outlet Bridge, looking west
120. Erie Railroad, looking east towards bridge
121. Railroad Reservoir- looking southeast
122. Lock 57, Genesee Valley Canal, looking west
123. Stone wall at overlook opposite Archery Field
124. Stone posts at former Wolf Creek entrance at DeGolyer Road
125. Dam from Dam Overlook Area, looking northeast
126. Stone wall at Park Road near Lauterbrunnen, looking north
127. Stone wall at Park Road near Lauterbrunnen, detail
128. Stone wall at Inspiration Point looking south
129. Overlook wall opposite Archery Field, looking east
130. Stone retaining wall, west side of road, looking north
131. Stone steps at Cathedral Rock, east side, near footbridge, looking northwest
132. Wolf Creek Bridge and stone wall, looking north
133. Detail of stonework
134. Stone retaining wall- west side of road, looking north
135. Stone retaining wall, west side of road below the High Bridge, looking north
136. Stone retaining wall, south of Cabin Area E, looking northeast
137. Stone wall at overlook opposite Archery Field, looking northeast
138. Culvert, triangular shaped with newer stones and a stepped top
139. Culvert with a single arch
140. Culvert, north of Littledyke House, view from the road
141. Culvert, north of Littledyke House, double arches
142. Culvert, south of Highbanks Recreation Maintenance Road
143. Stone-lined gutters on road to Gardeau overlook, north side
144. Culvert- north end of park
145. Middle Falls Reservoir #210, looking east
146. View looking southeast from #100 shelter north of Highbanks area

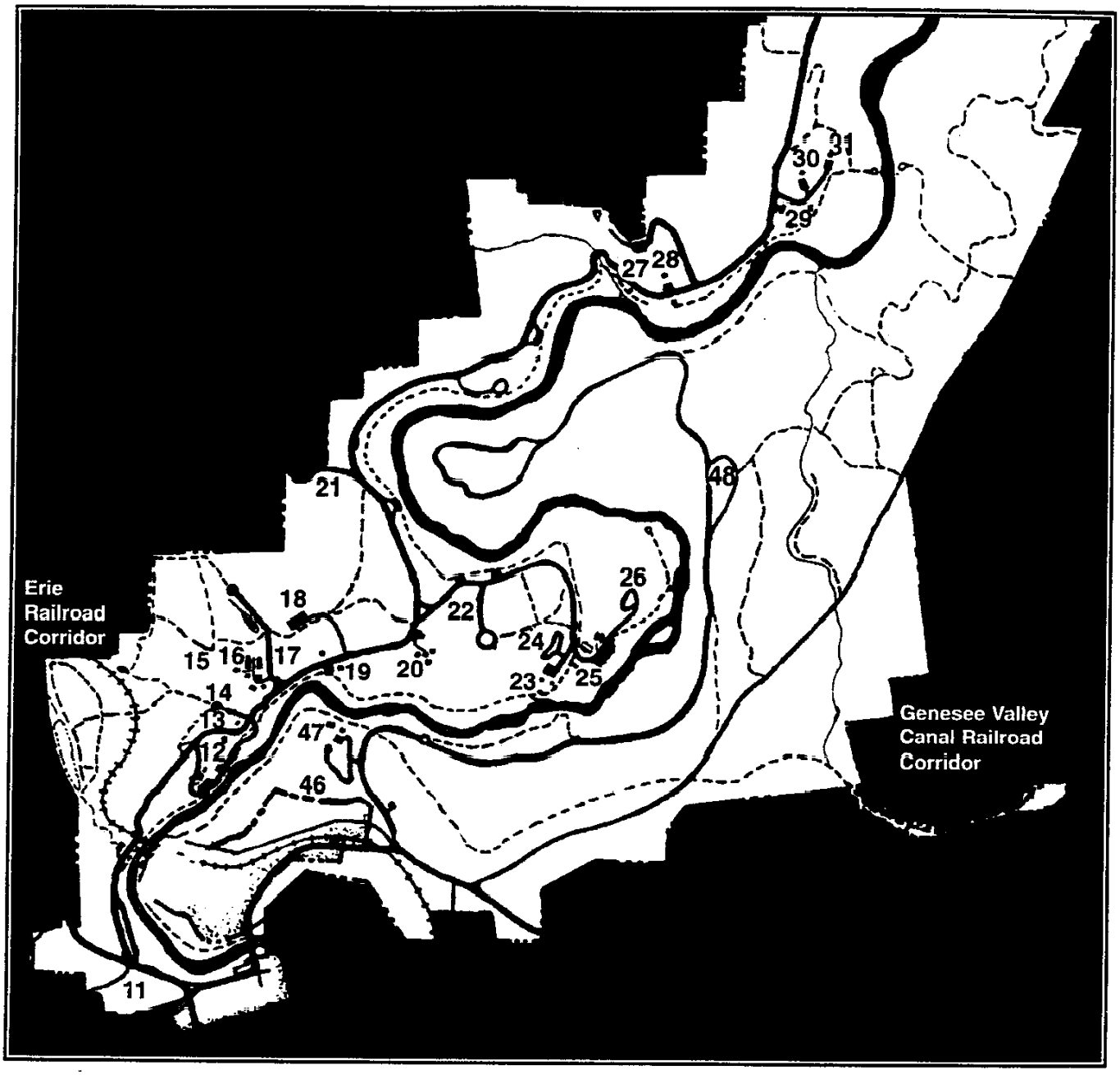





LEICESTER
CASTILE
MOUNT MORRIS
GENESEE FALLS
PORTAGE


N
Letchworth State Park
LEGEND
overlook
roads
park boundary

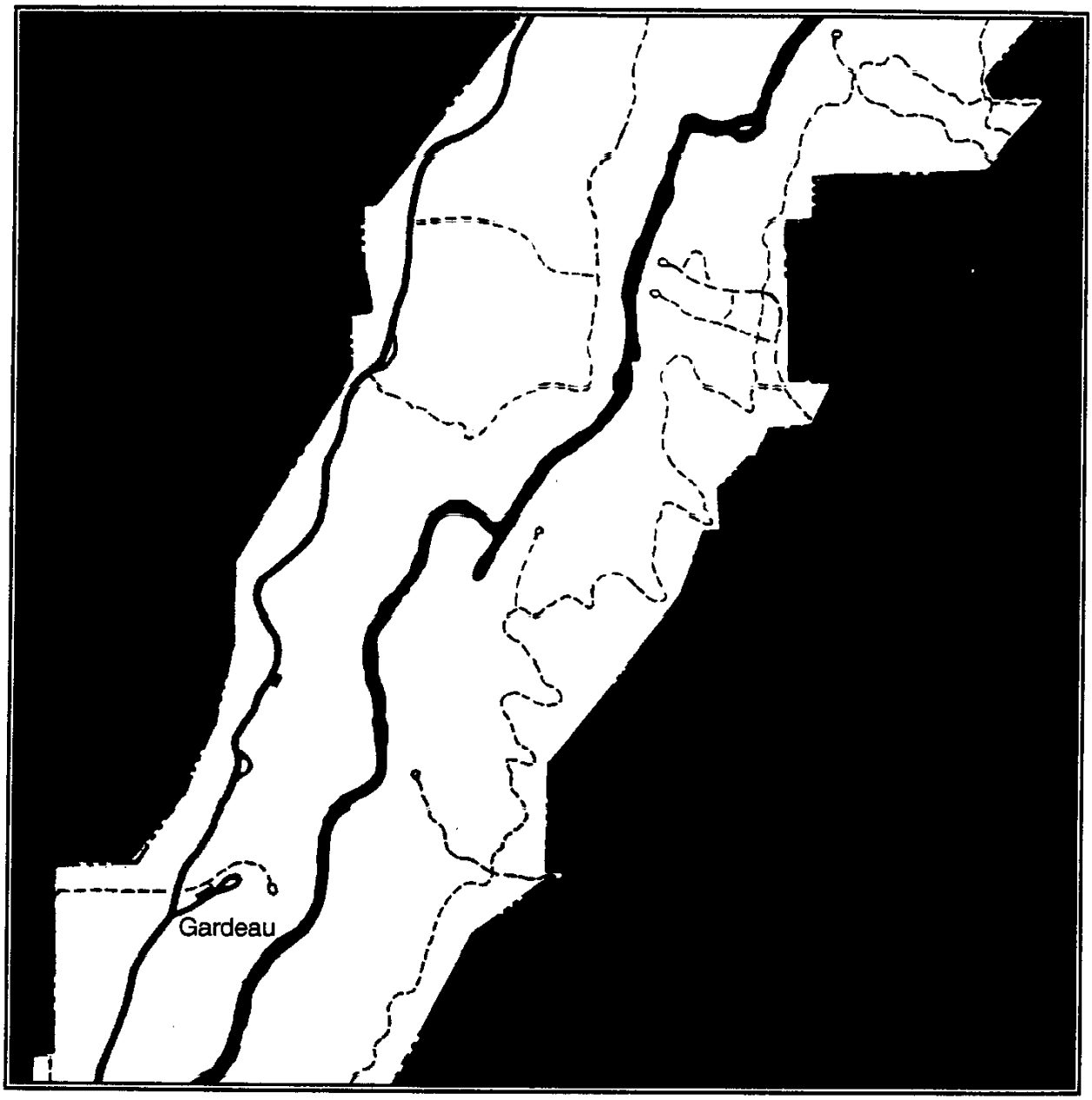
Not to scale



Letchworth State Park
South 1/3 Enlargement

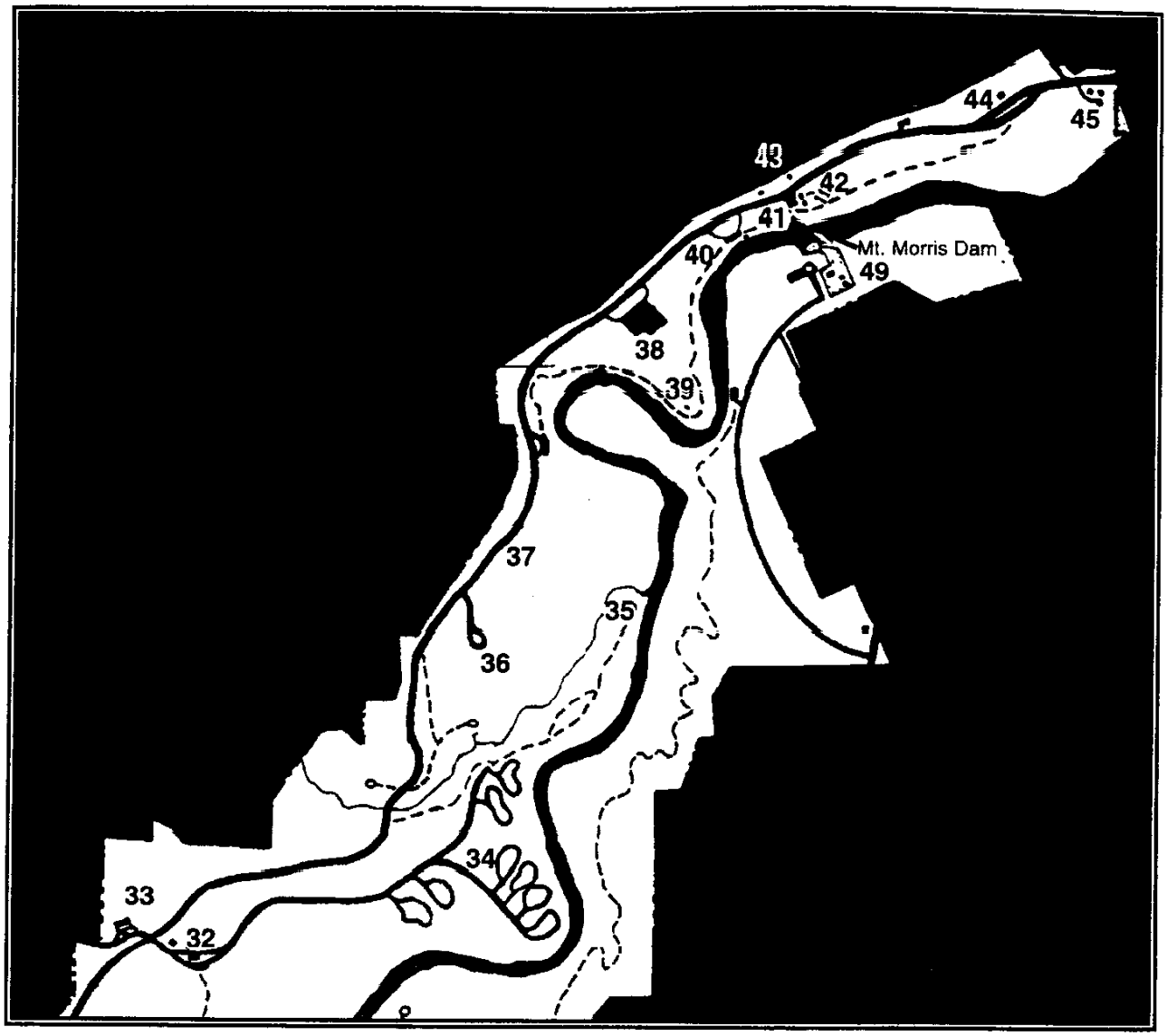
Not to scale

Numbers correspond to specific areas noted on the Resource List and on the detailed Area Sketch Maps.



Letchworth State Park
Center 1/3 Enlargement

Not to scale



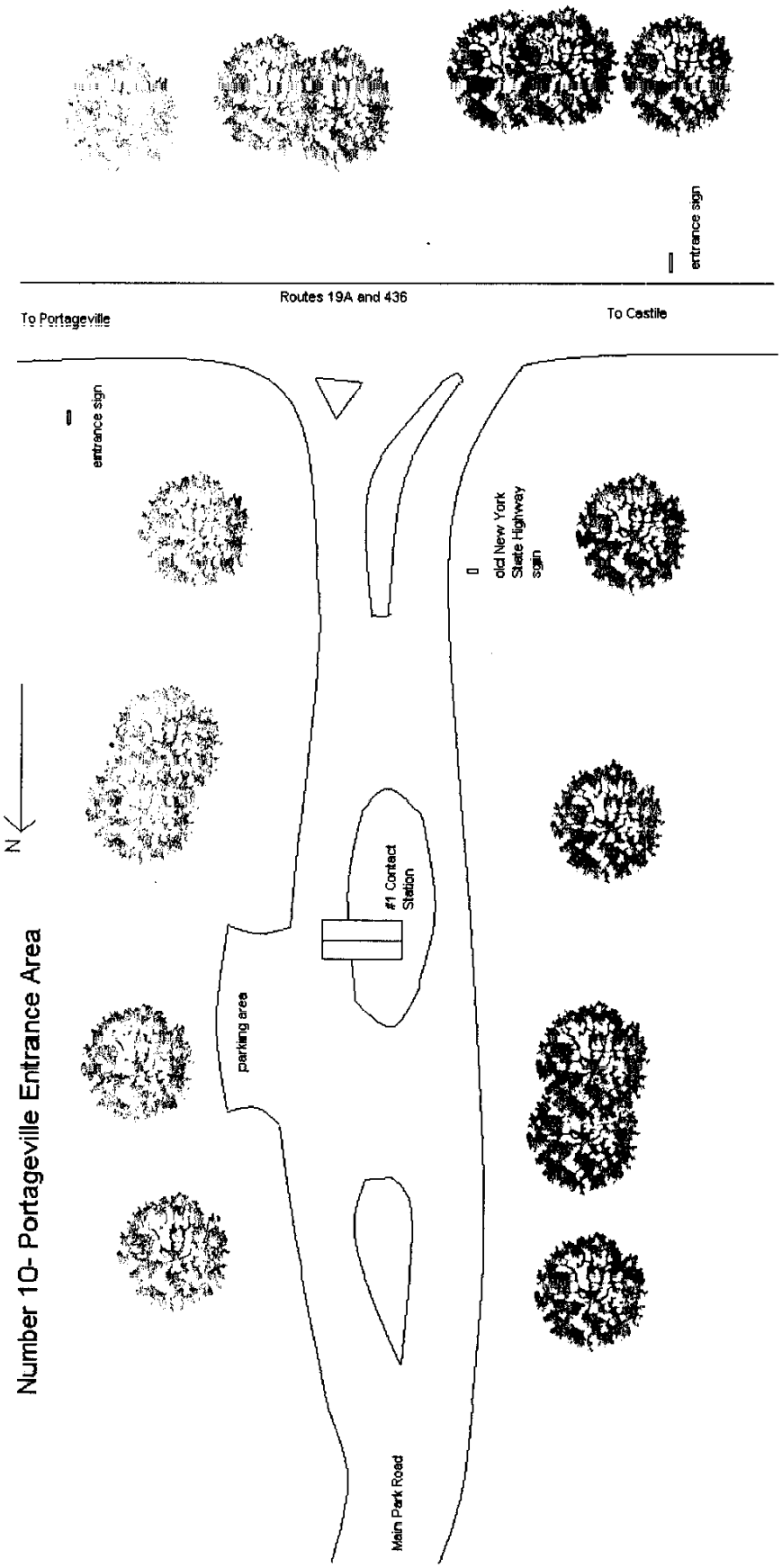
Letchworth State Park
North 1/3 Enlargement

Not to scale

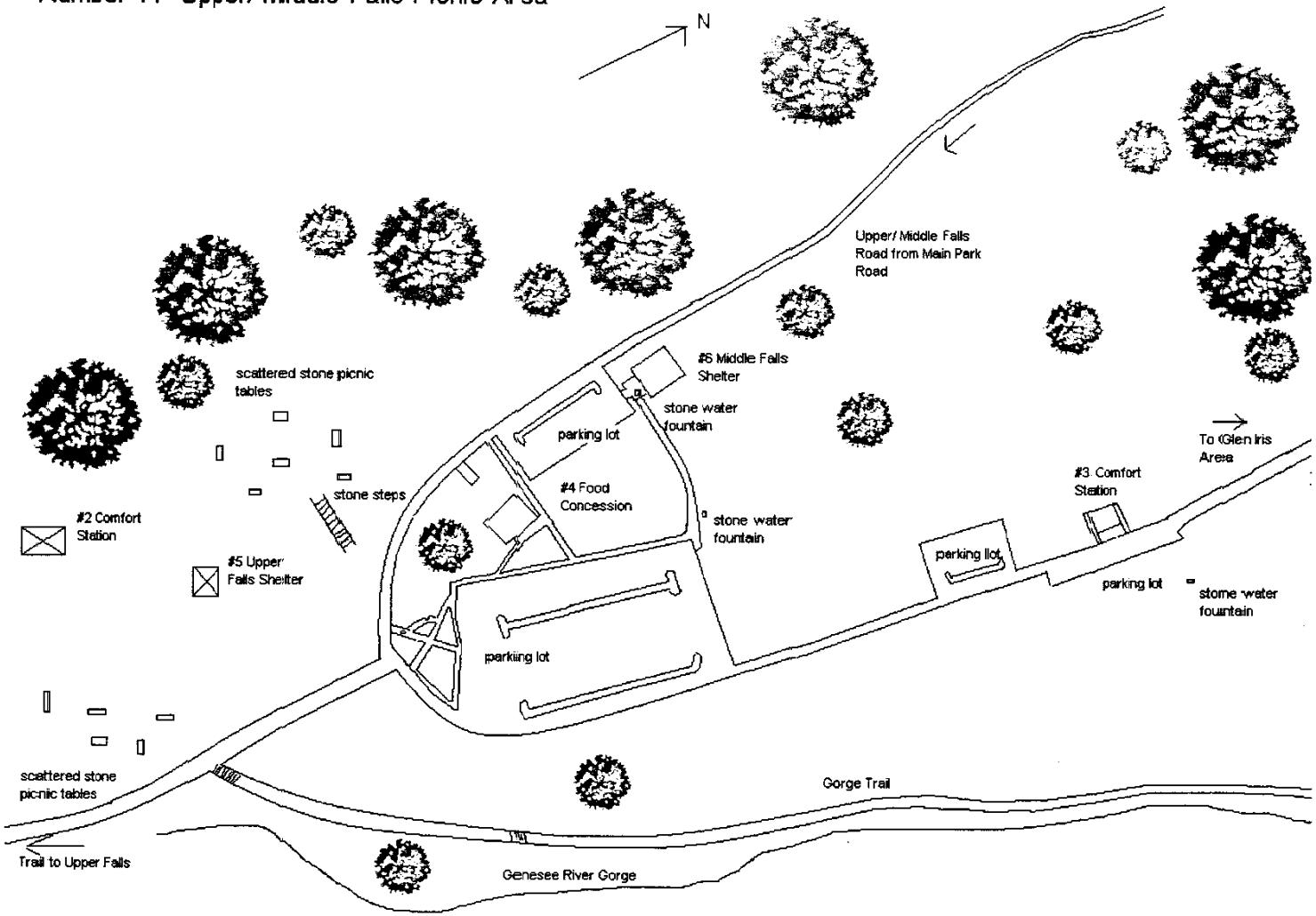
Numbers correspond to specific areas noted on the Resource List and on the detailed Area Sketch Maps.

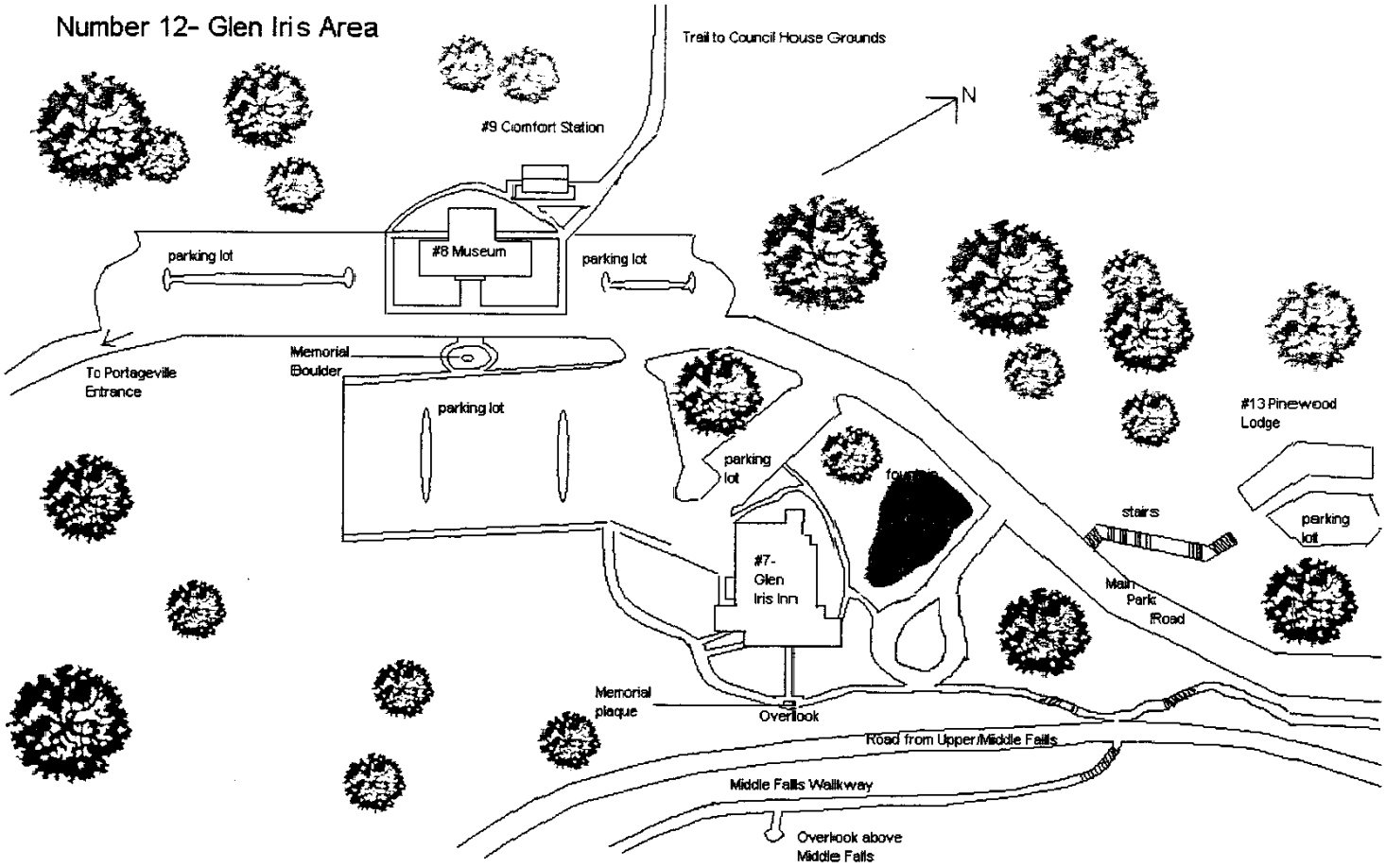
LETCHWORTH STATE PARK AREA SKETCH MAPS

Not to scale
Refer to Resource List for descriptions of each geographic area.


Number 10- Portageville Entrance Area
N
entrance sign
parking area
#1 Contact Station
Main Park Road
old New York State Highway sign
entrance sign
To Portageville
Routes 19A and 436
To Castile

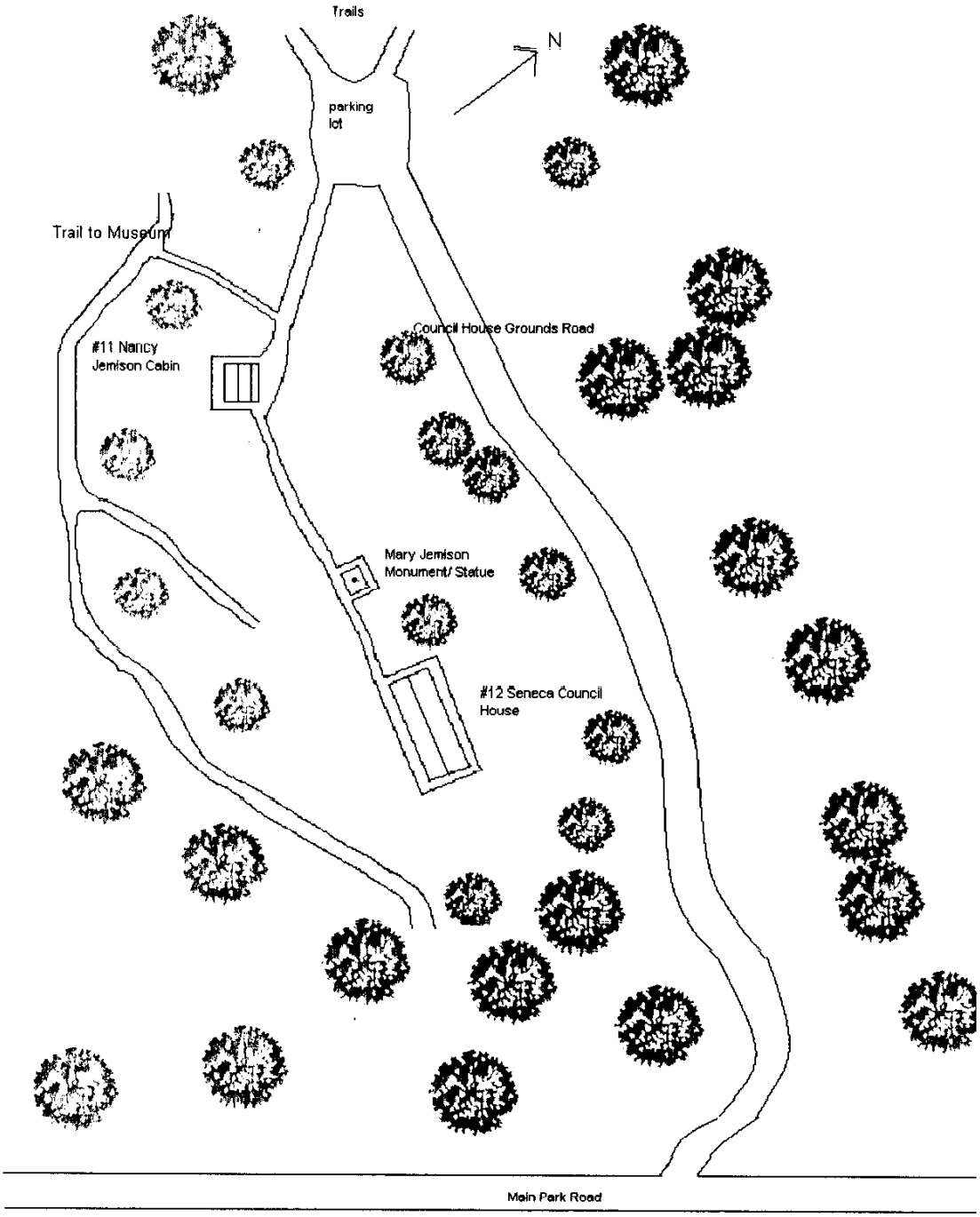
Number 11- Upper/ Middle Falls Picnic Area



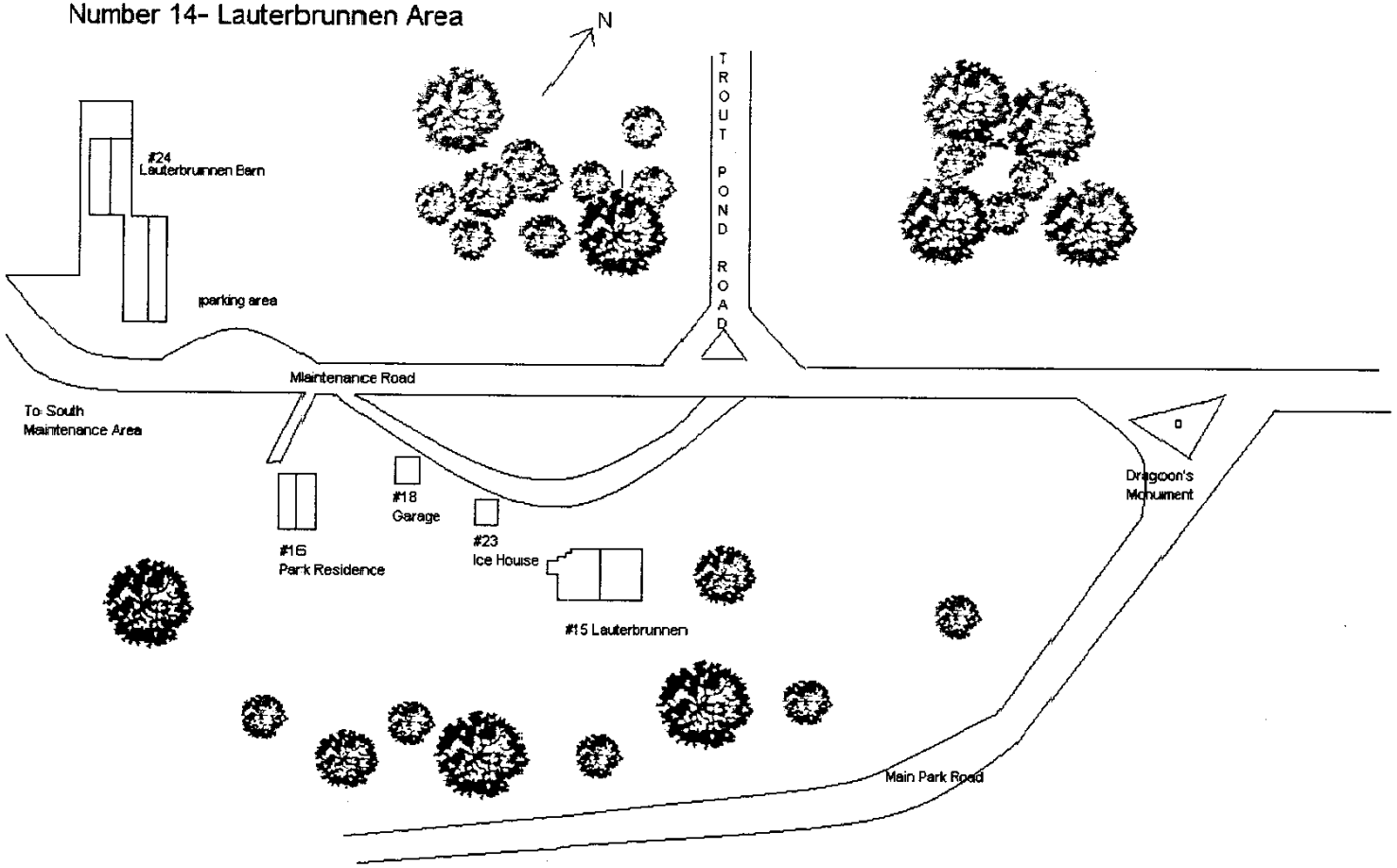


Genesee River Gorge

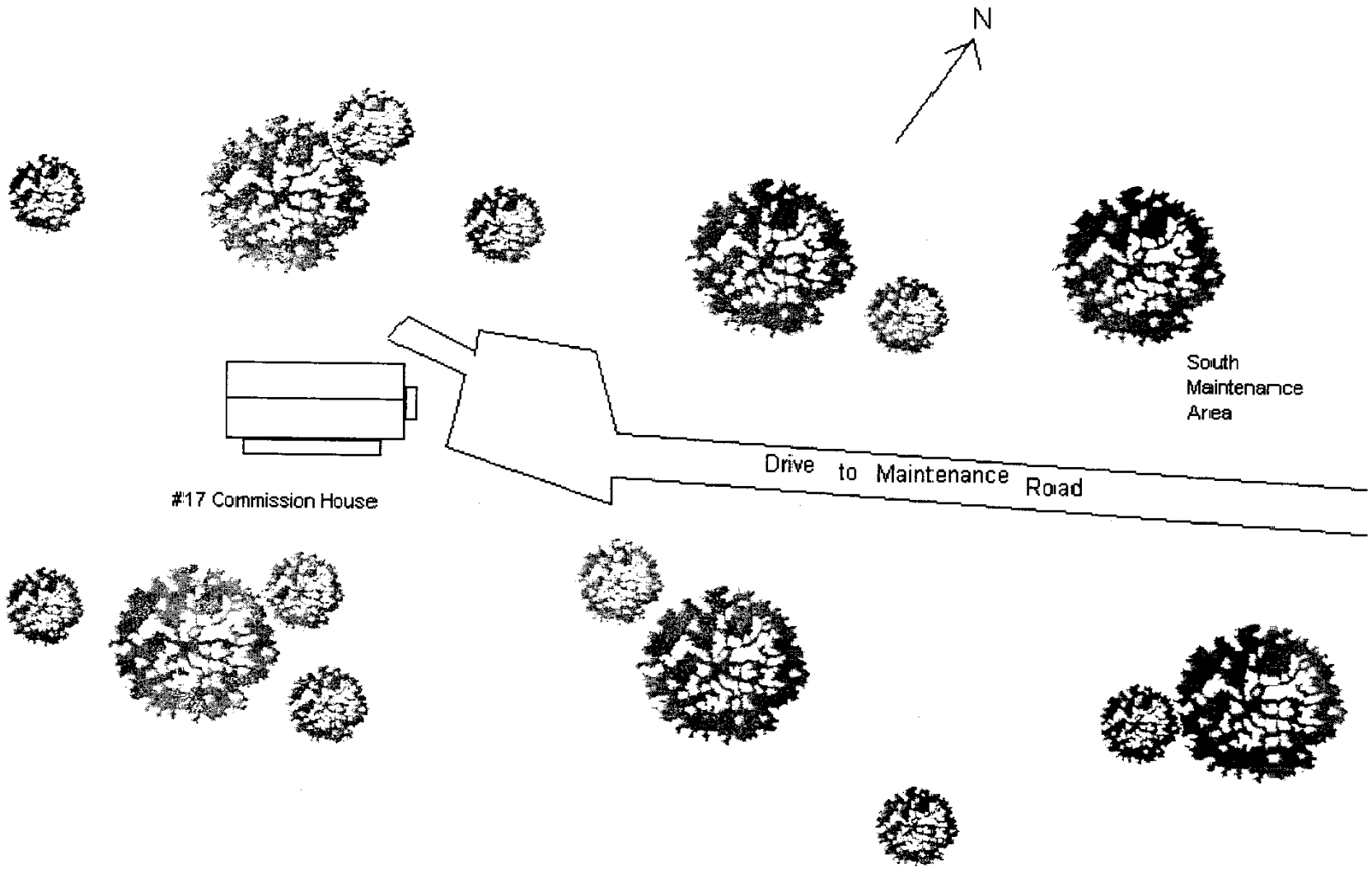
Number 13- Council House Grounds Area



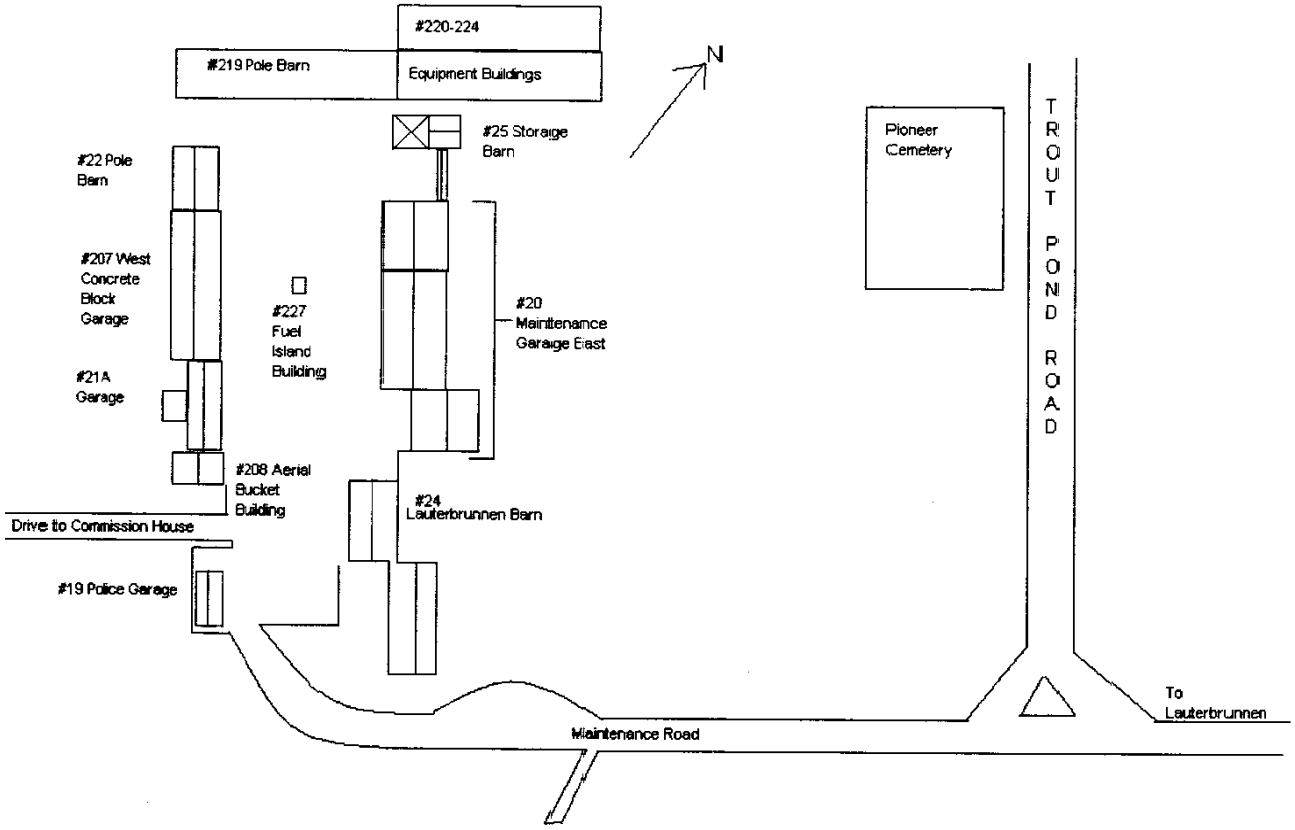
Number 14- Lauterbrunnen Area



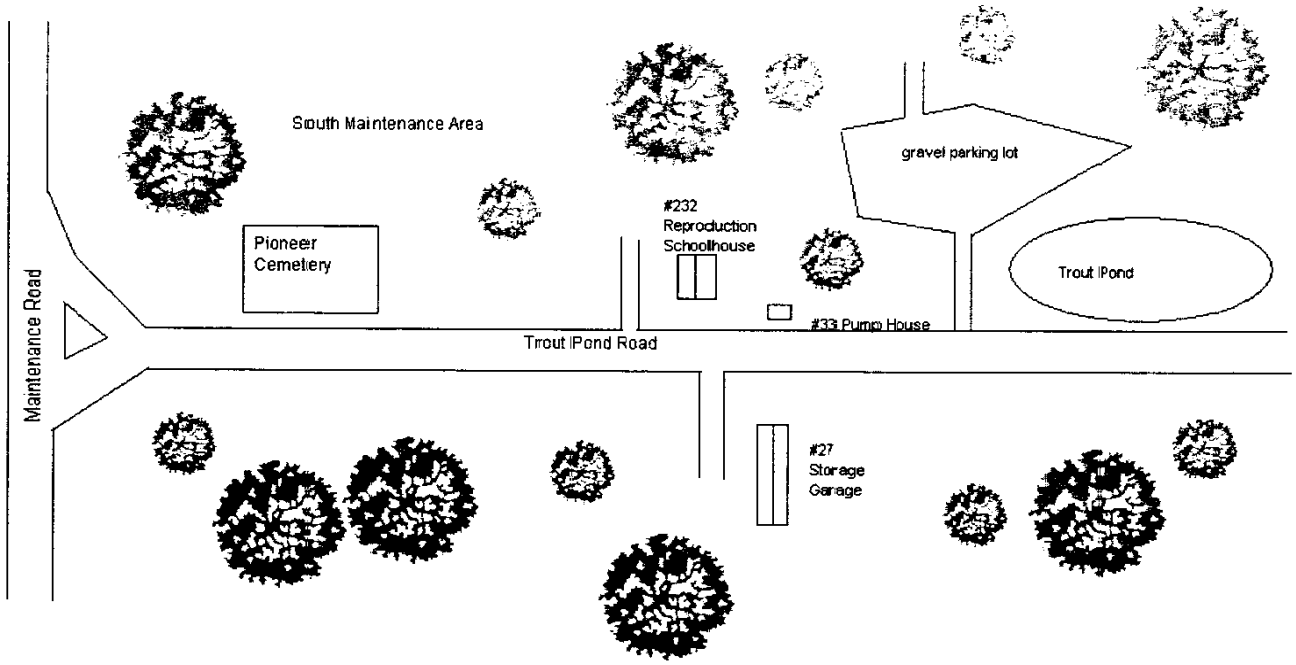
Number 15- Commission House Area

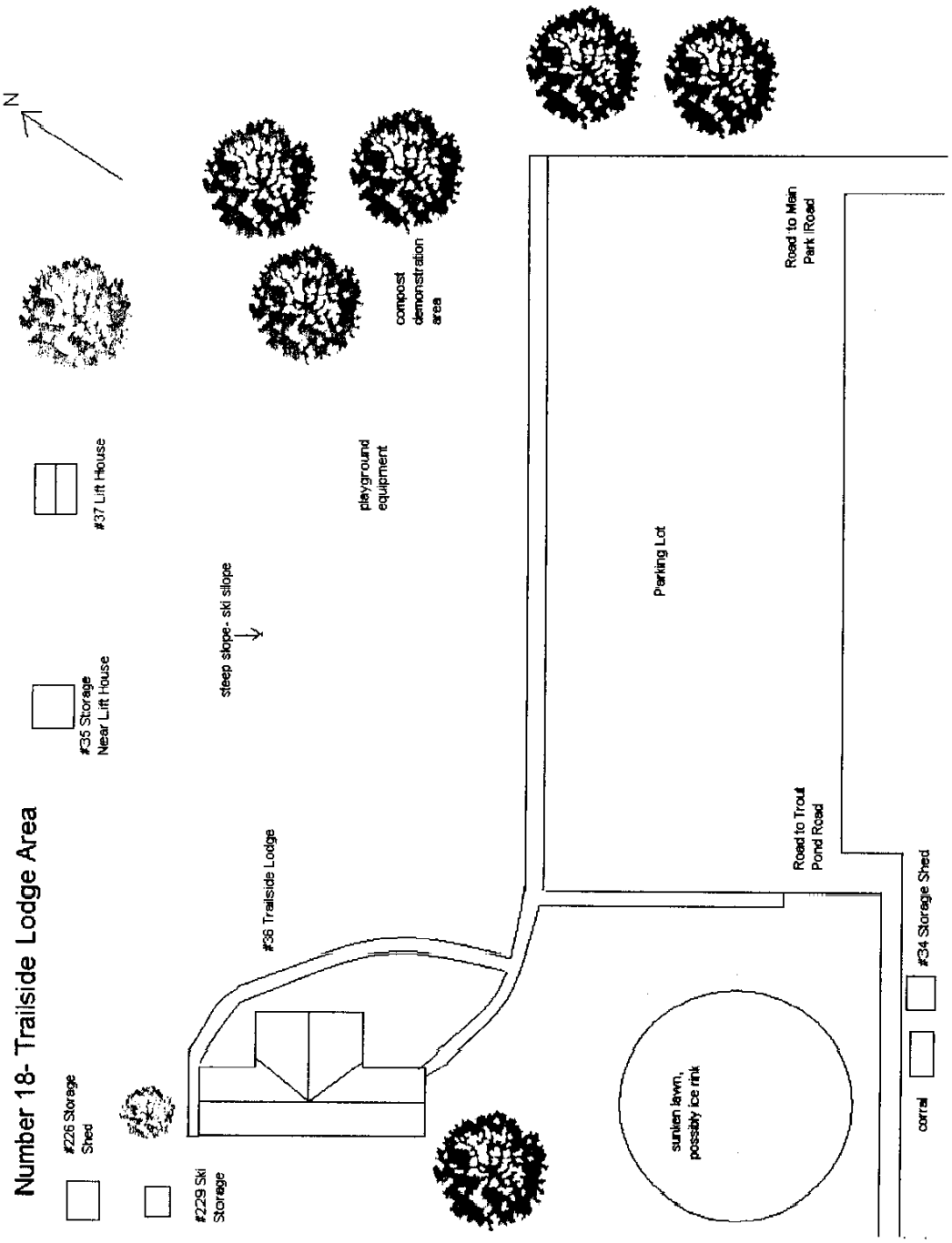


Number 16- South Maintenance Area

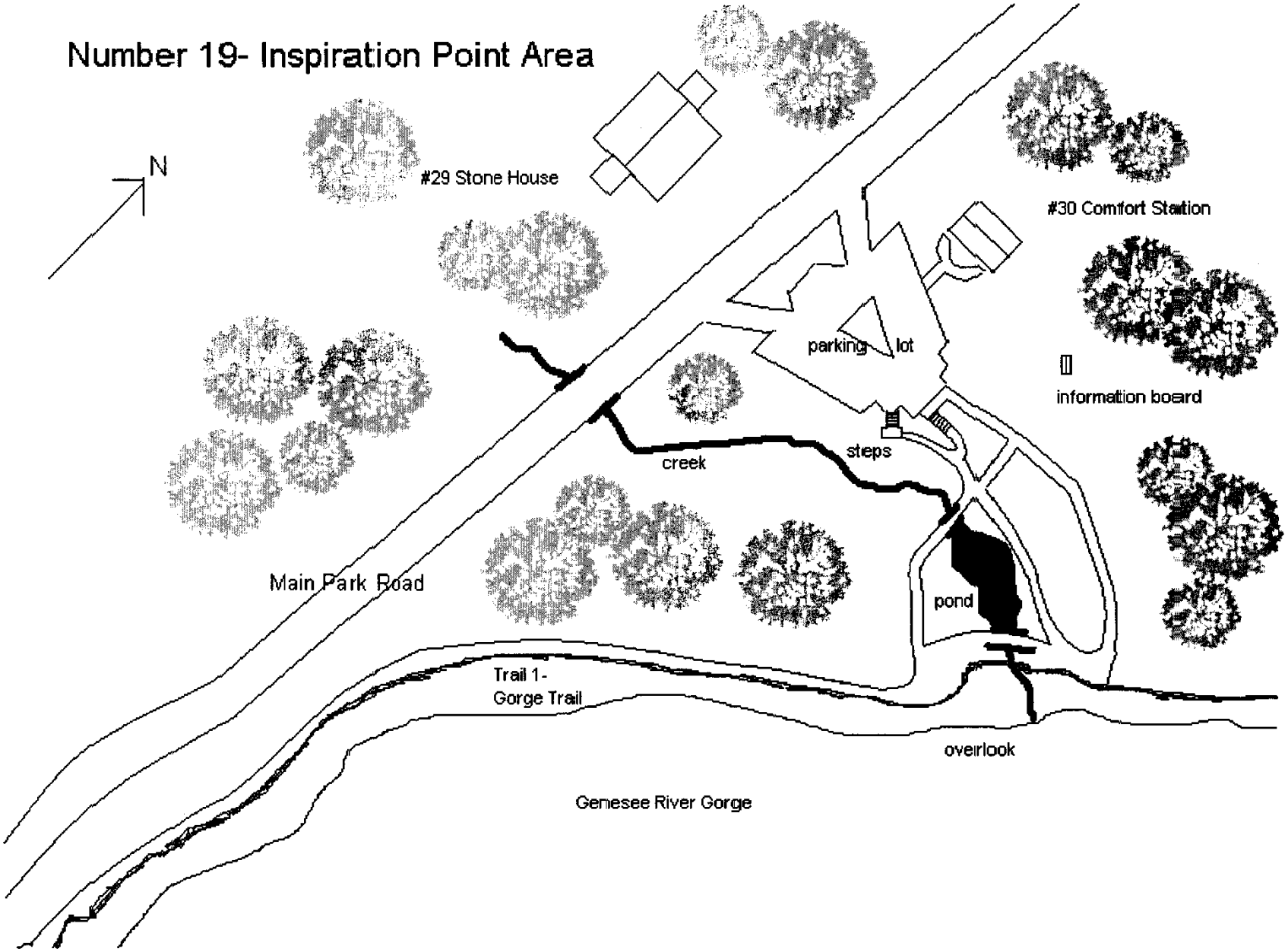


Number 17- Trout Pond Road Area

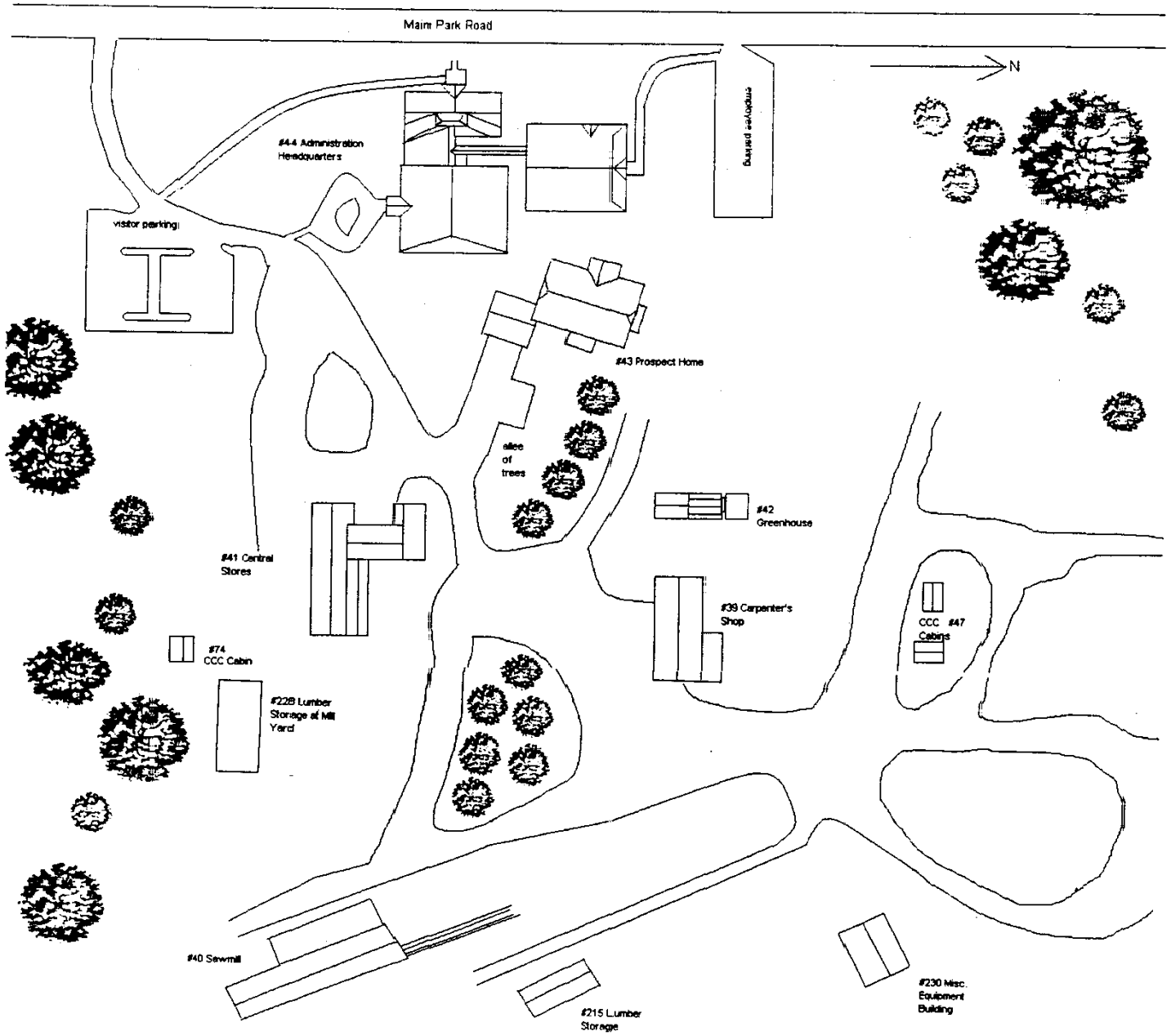



Number 18- Trailside Lodge Area
N
#226 Storage Shed
#229 Ski Storage
#36 Trailside Lodge
#35 Storage Near Lift House
#37 Lift House
steep slope- ski slope
playground equipment
compost demonstration area
sunken lawn, possibly ice rink
Parking Lot
Road to Trout Pond Road
Road to Main Park Road
#34 Storage Shed
corral

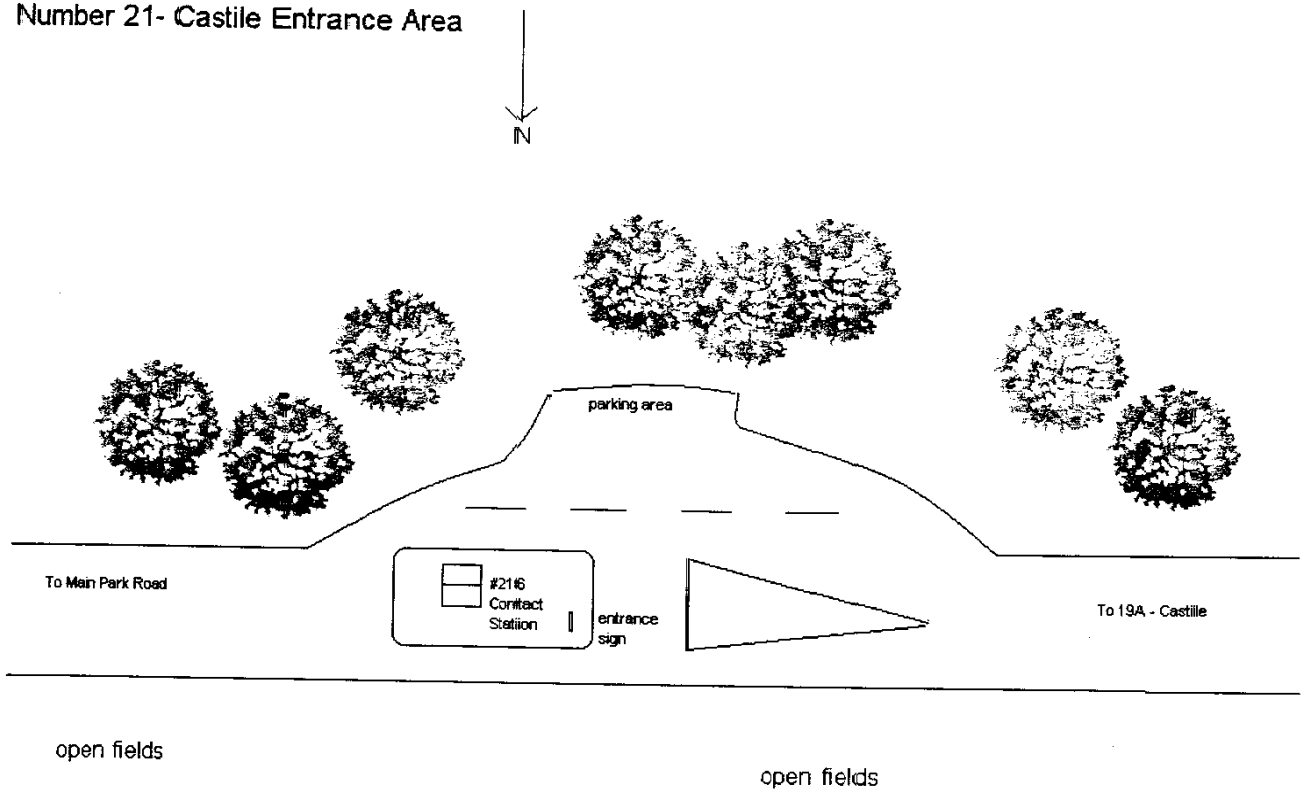
Number 19- Inspiration Point Area



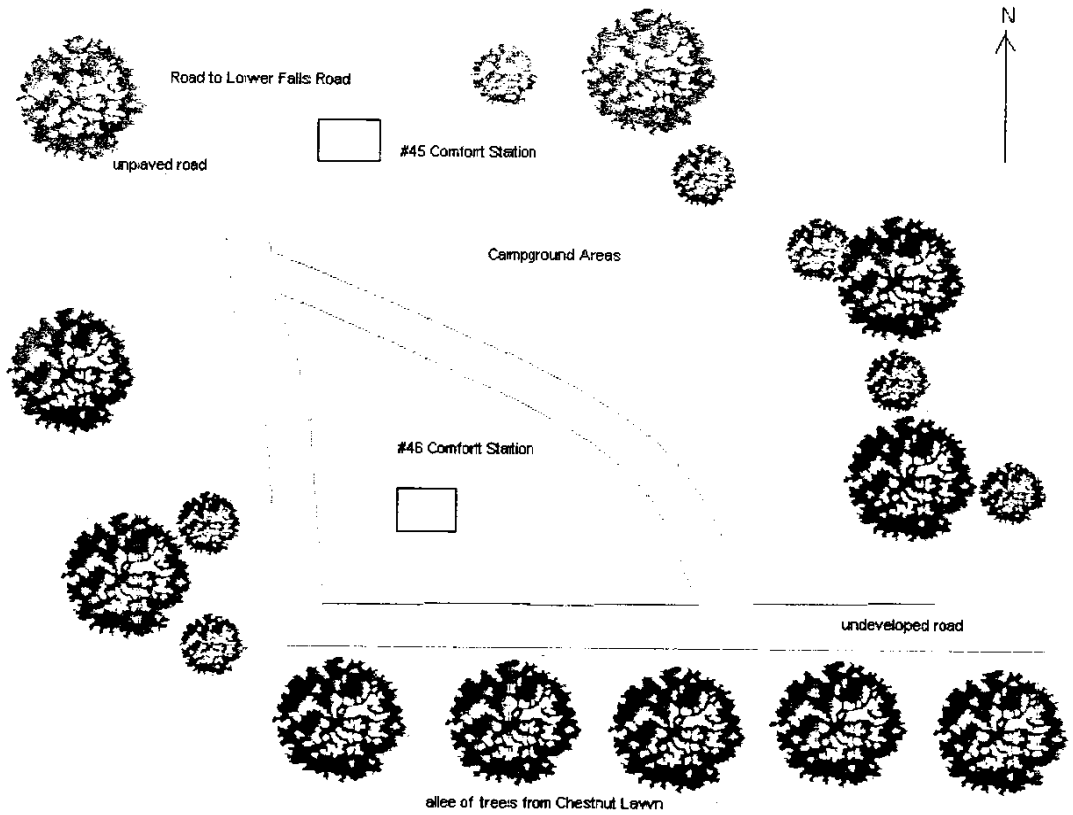
Number 20- Labor Center- Administration Area



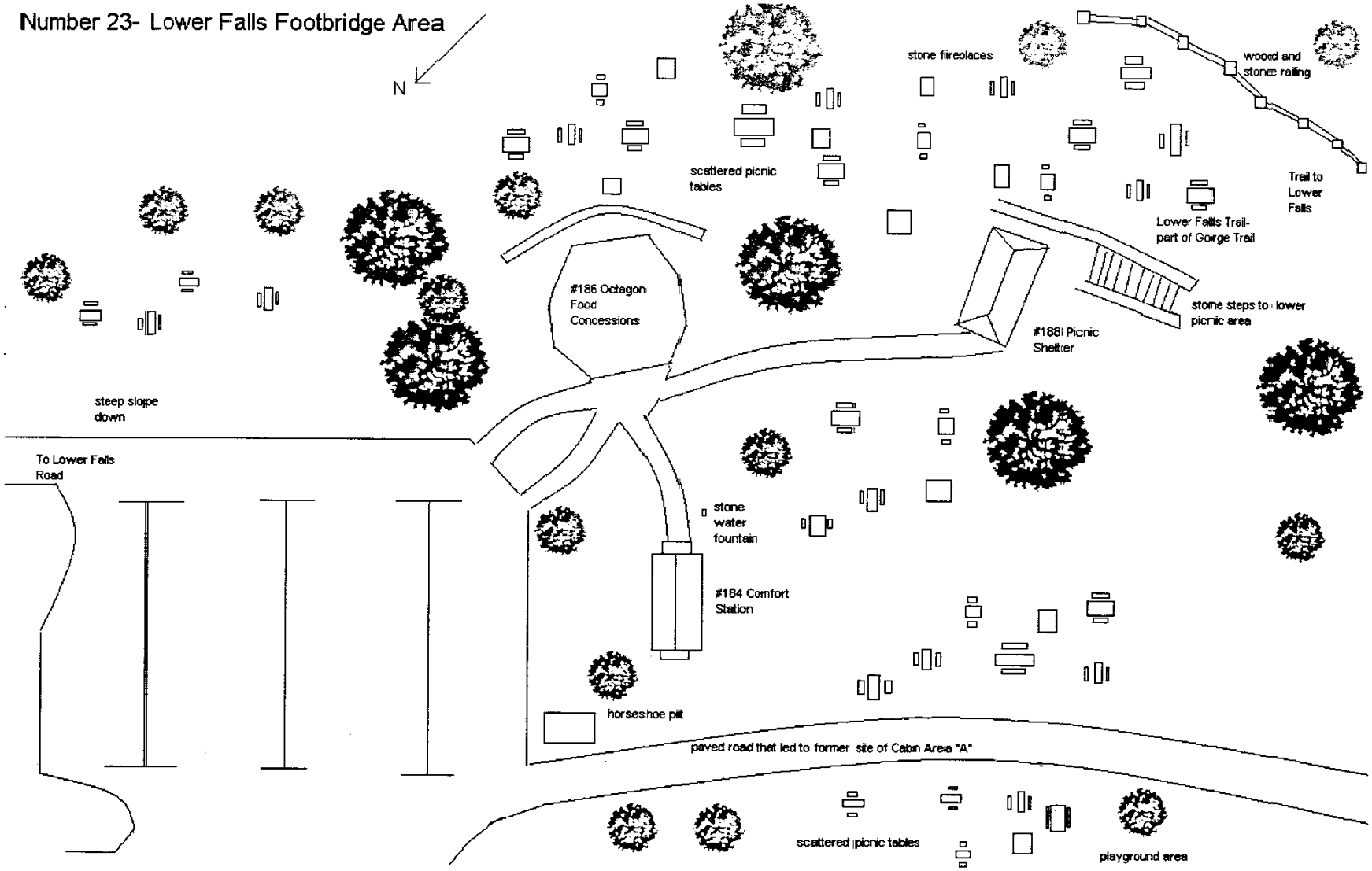
Number 21- Castile Entrance Area



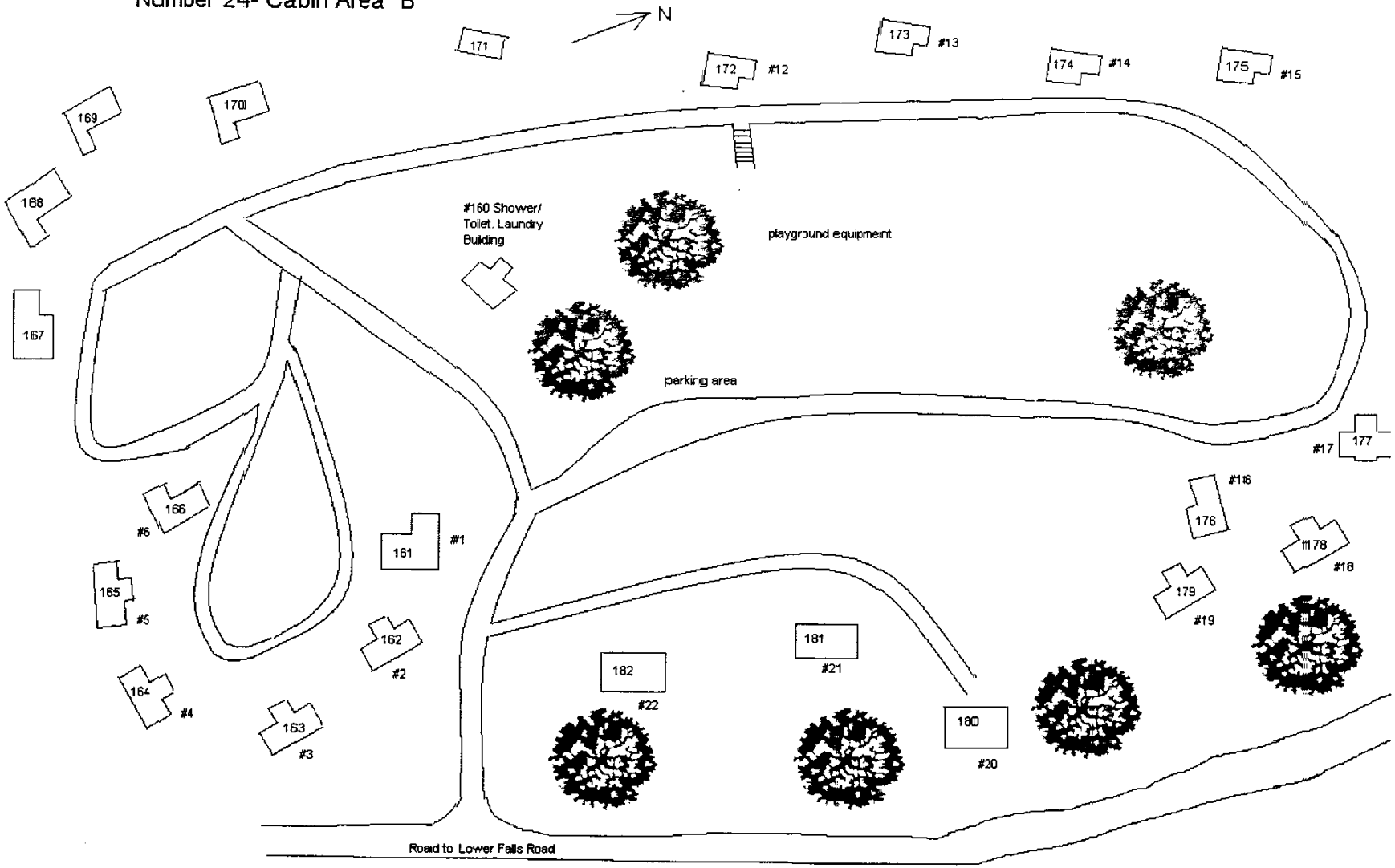
Number 22- Group Camping Area



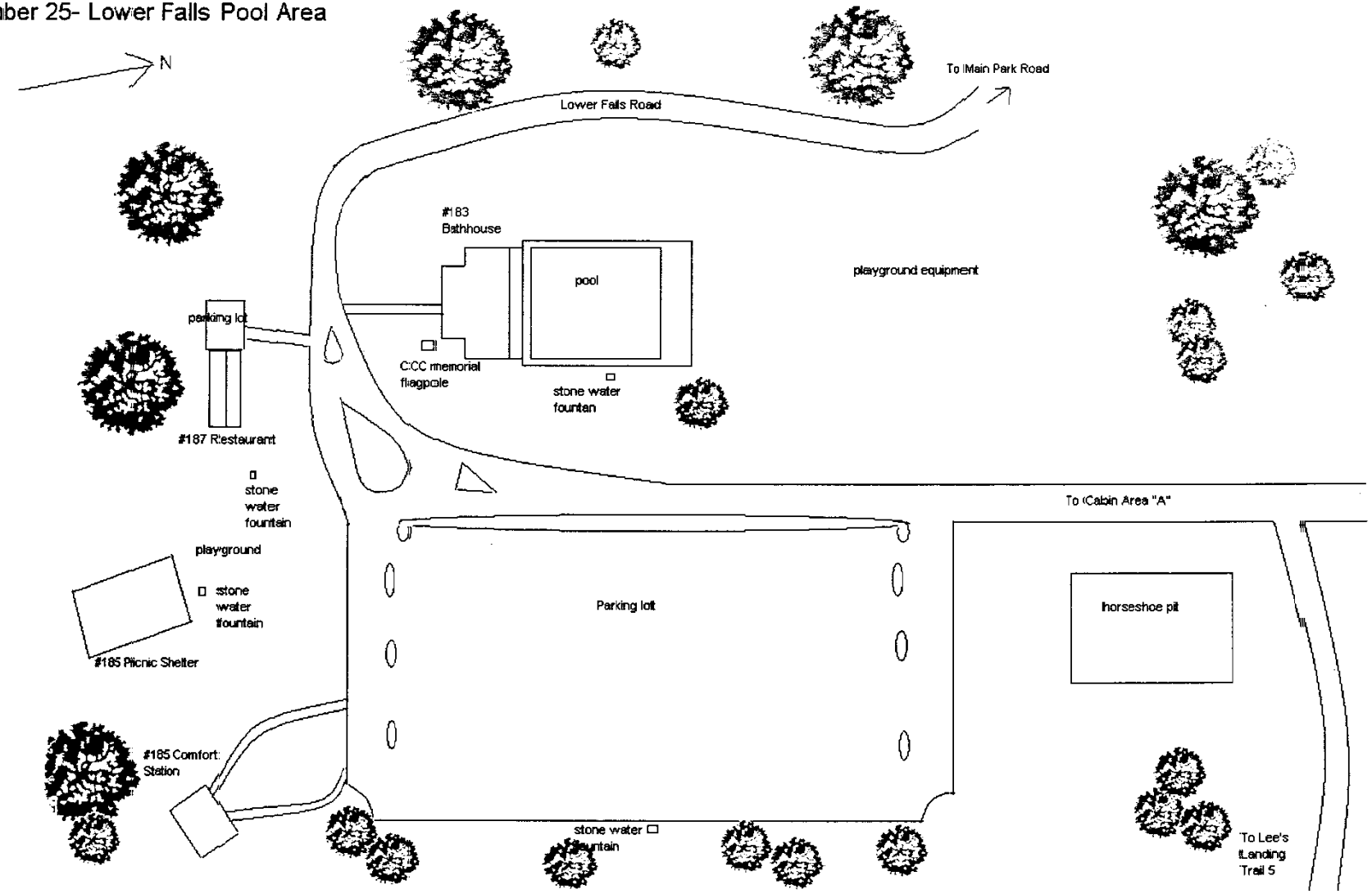
Number 23- Lower Falls Footbridge Area



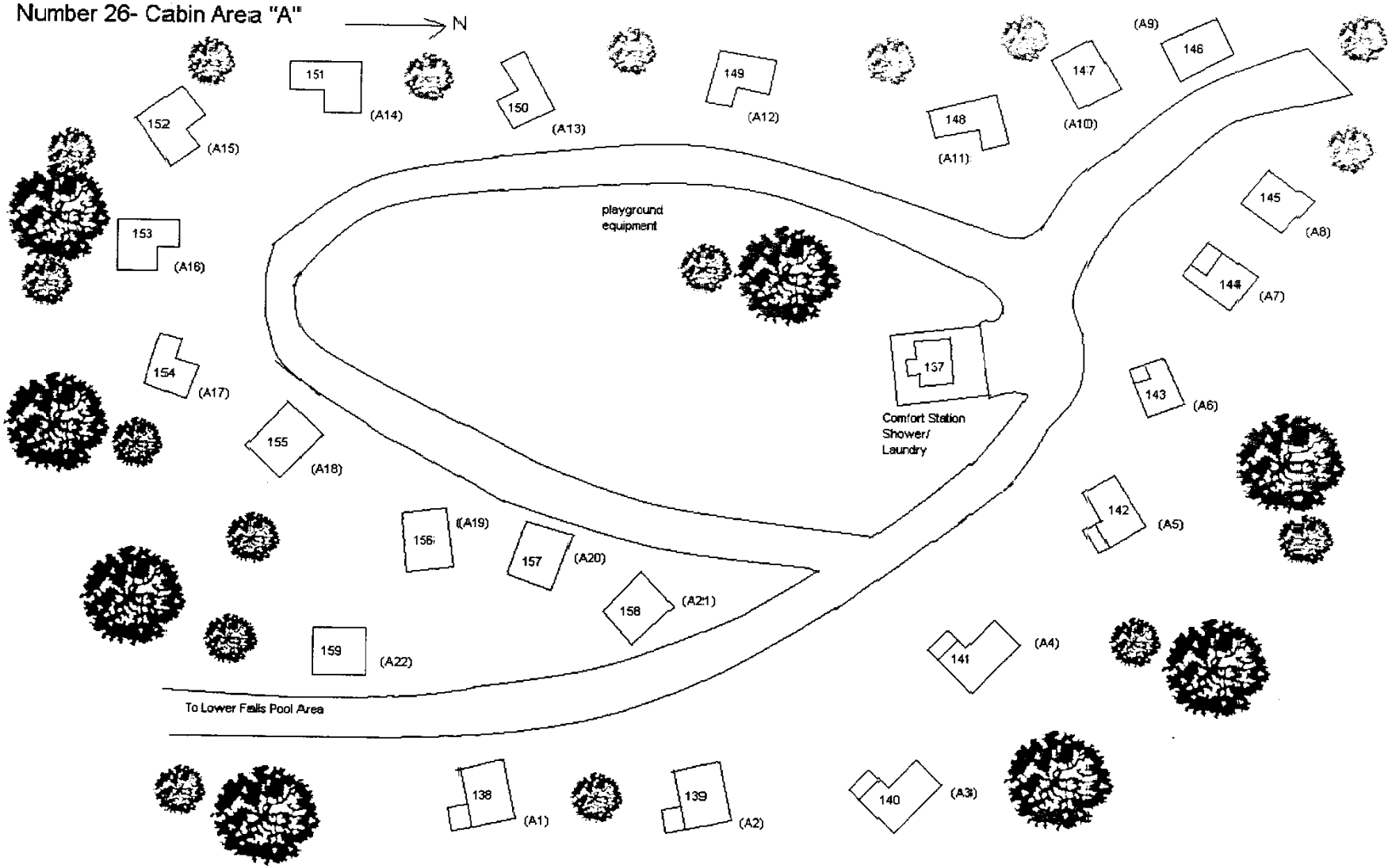
Number 24- Cabin Area "B"



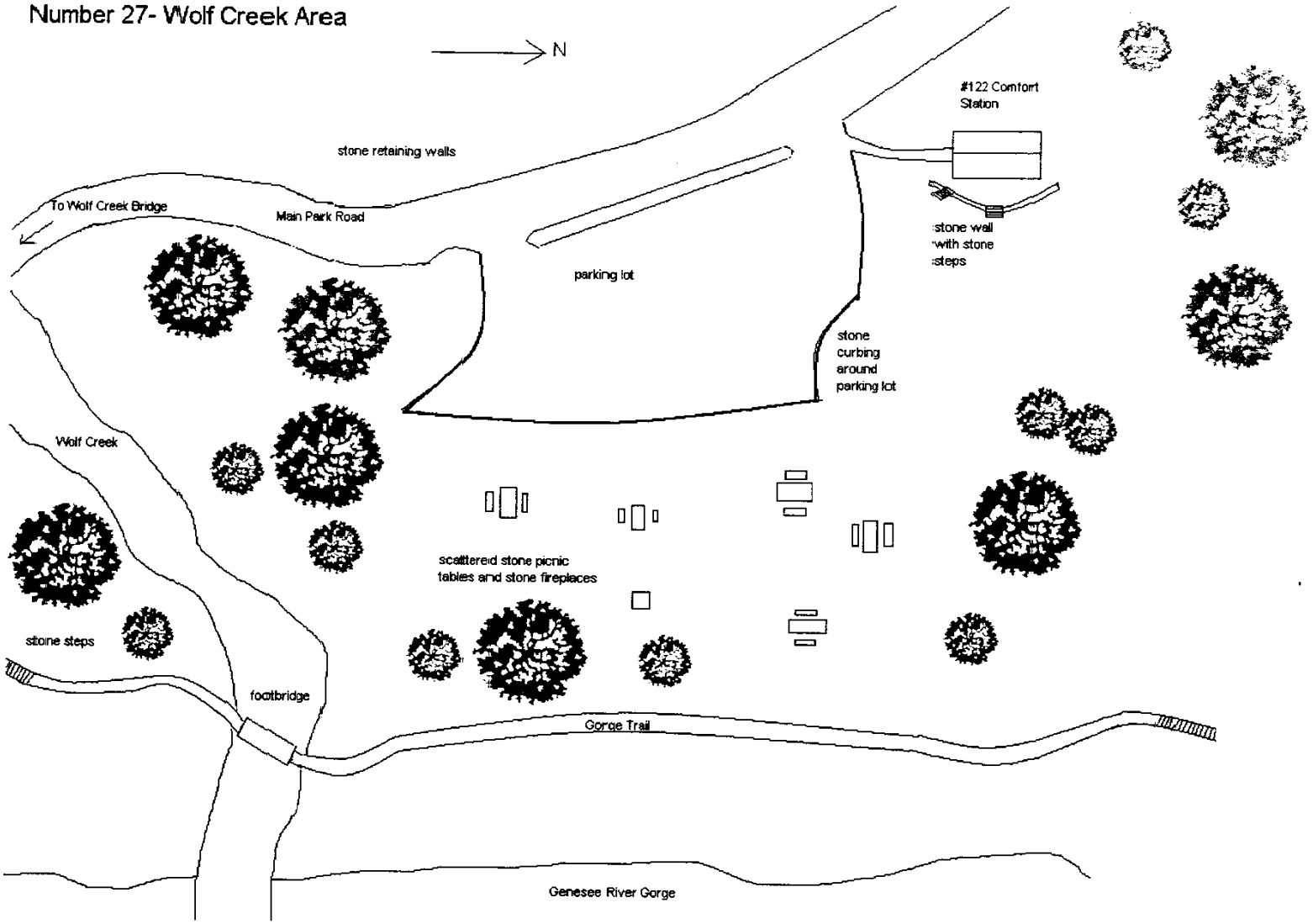
Number 25- Lower Falls Pool Area



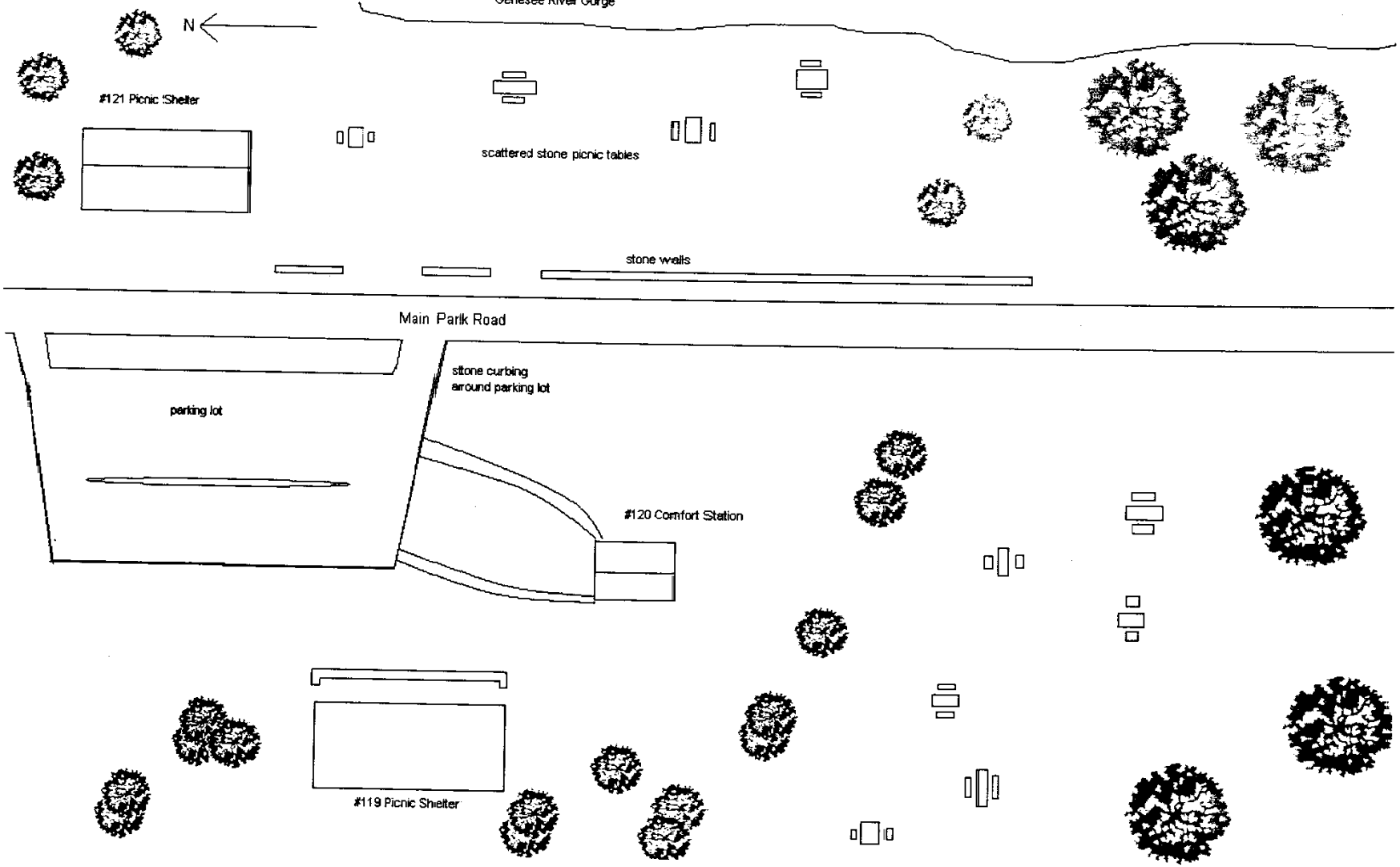
Number 26- Cabin Area "A"



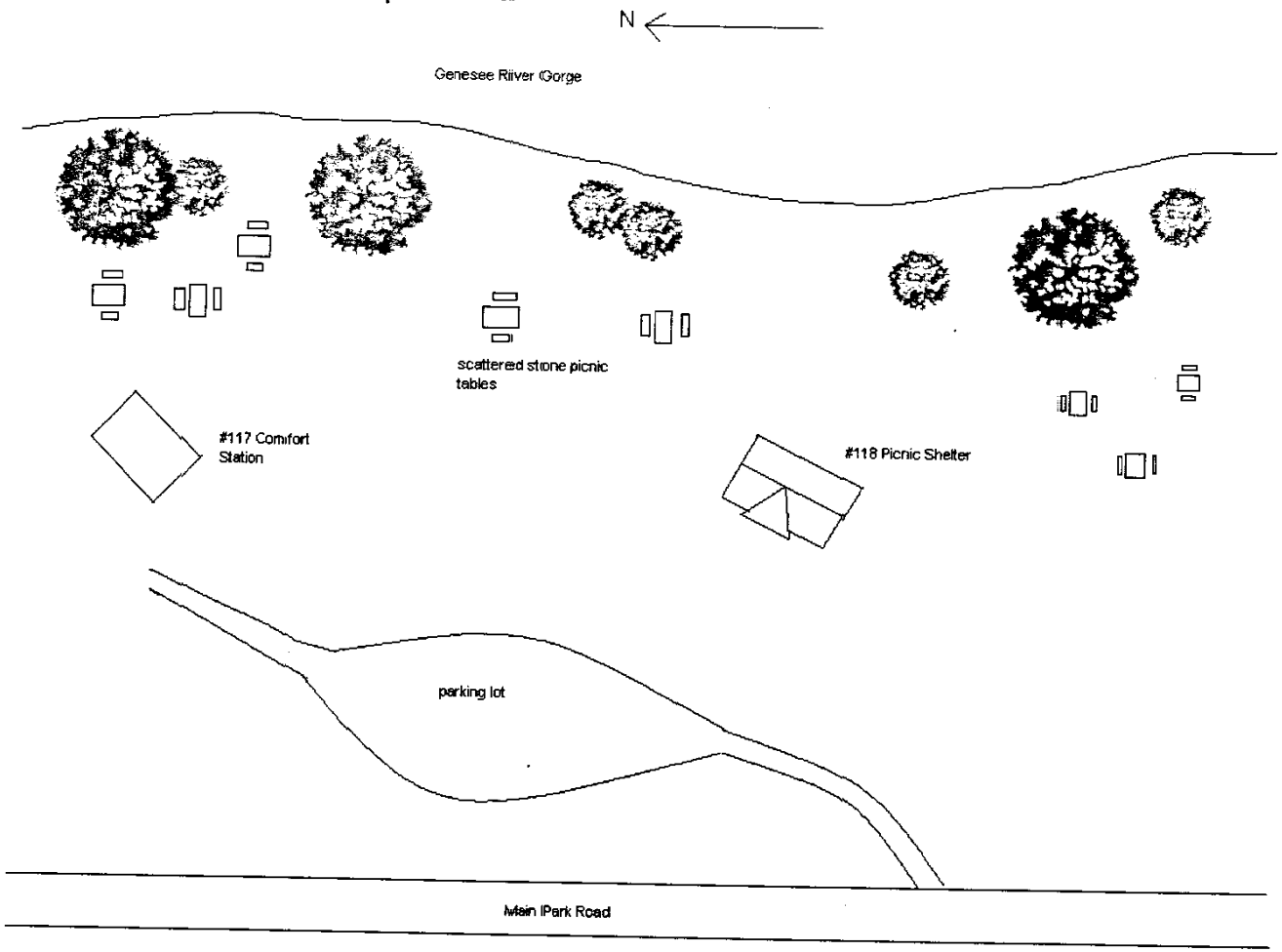
Number 27- Wolf Creek Area



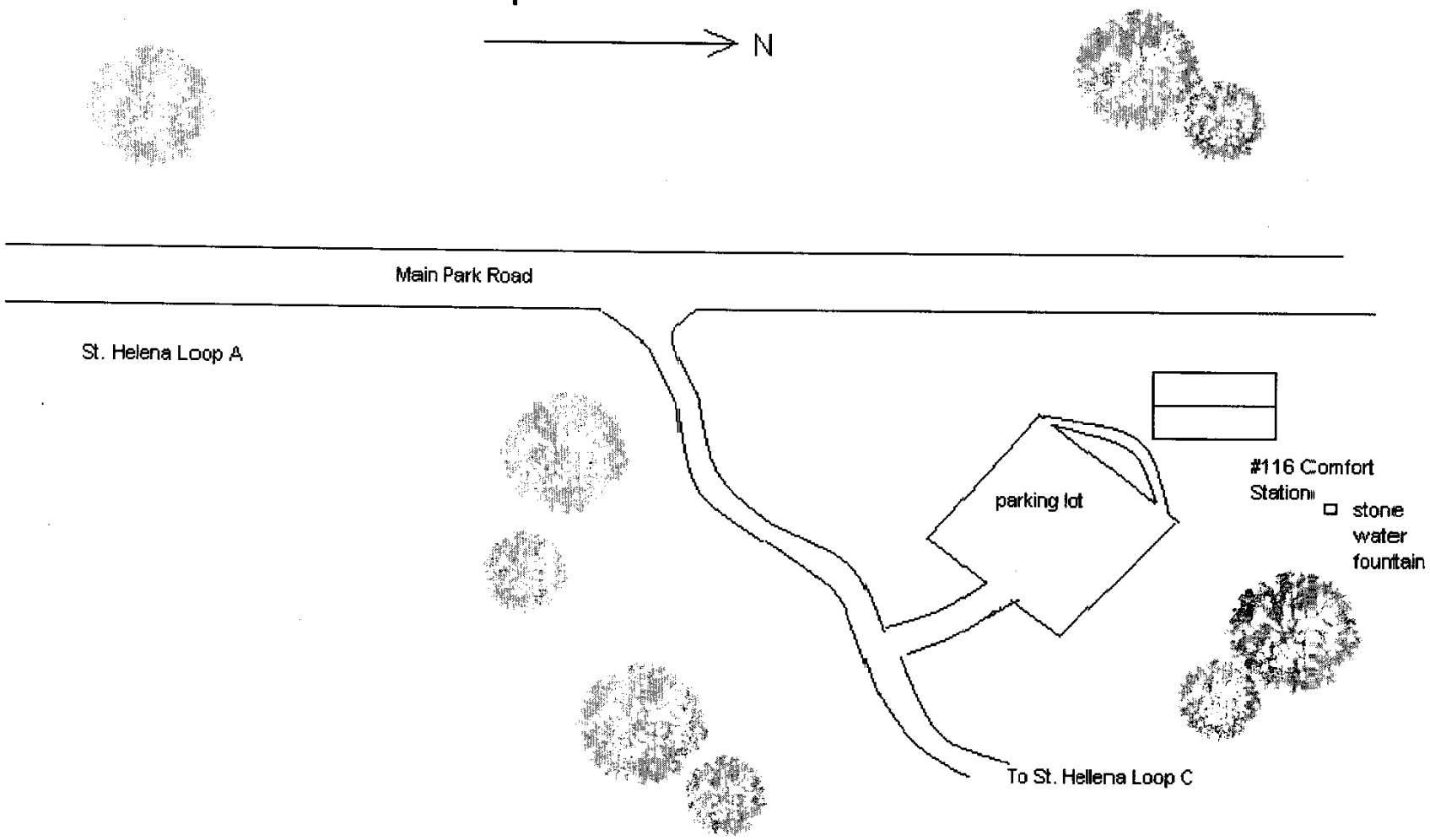
Number 28- Tea Table Area



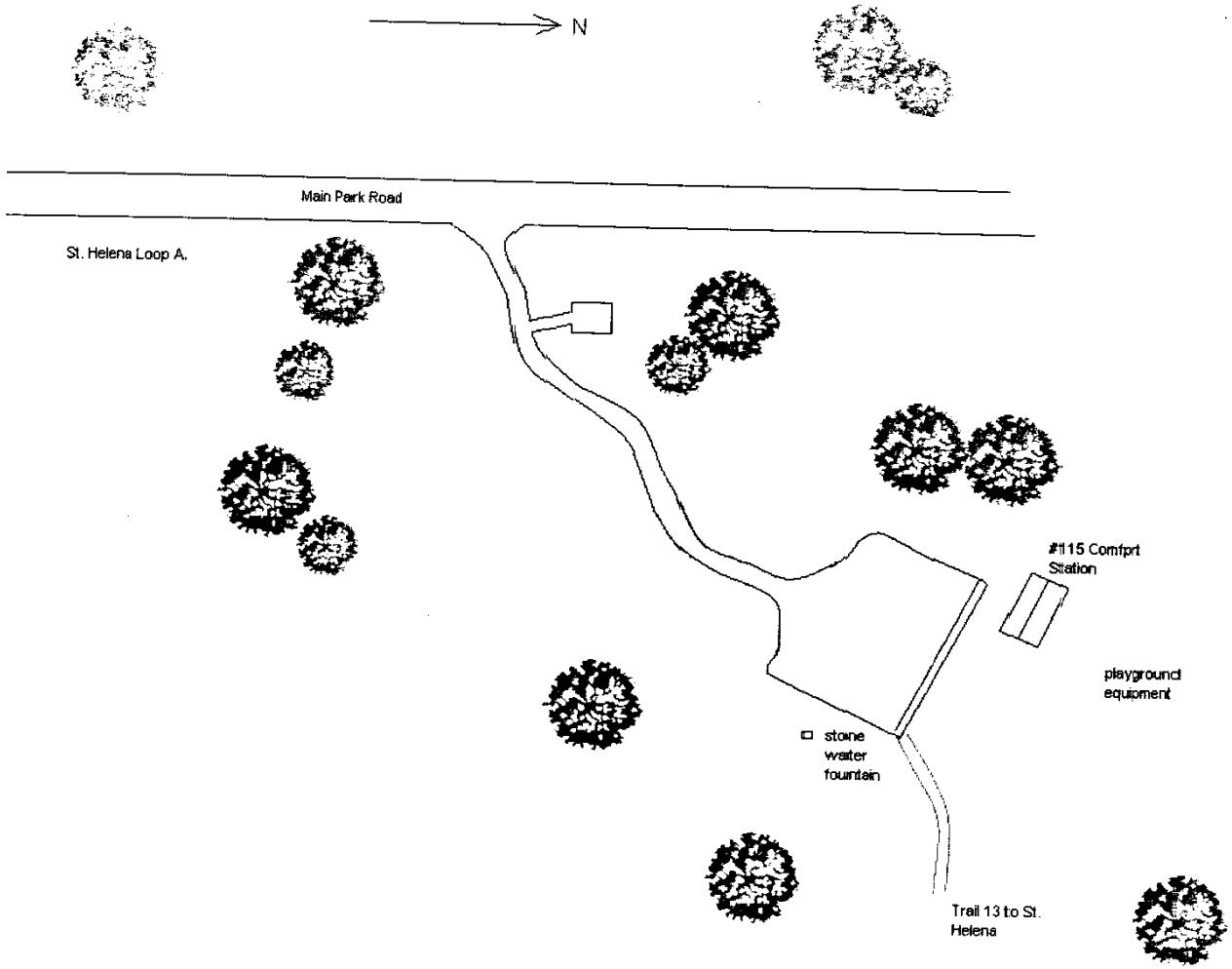
Number 29- St. Helena Loop "A" Area



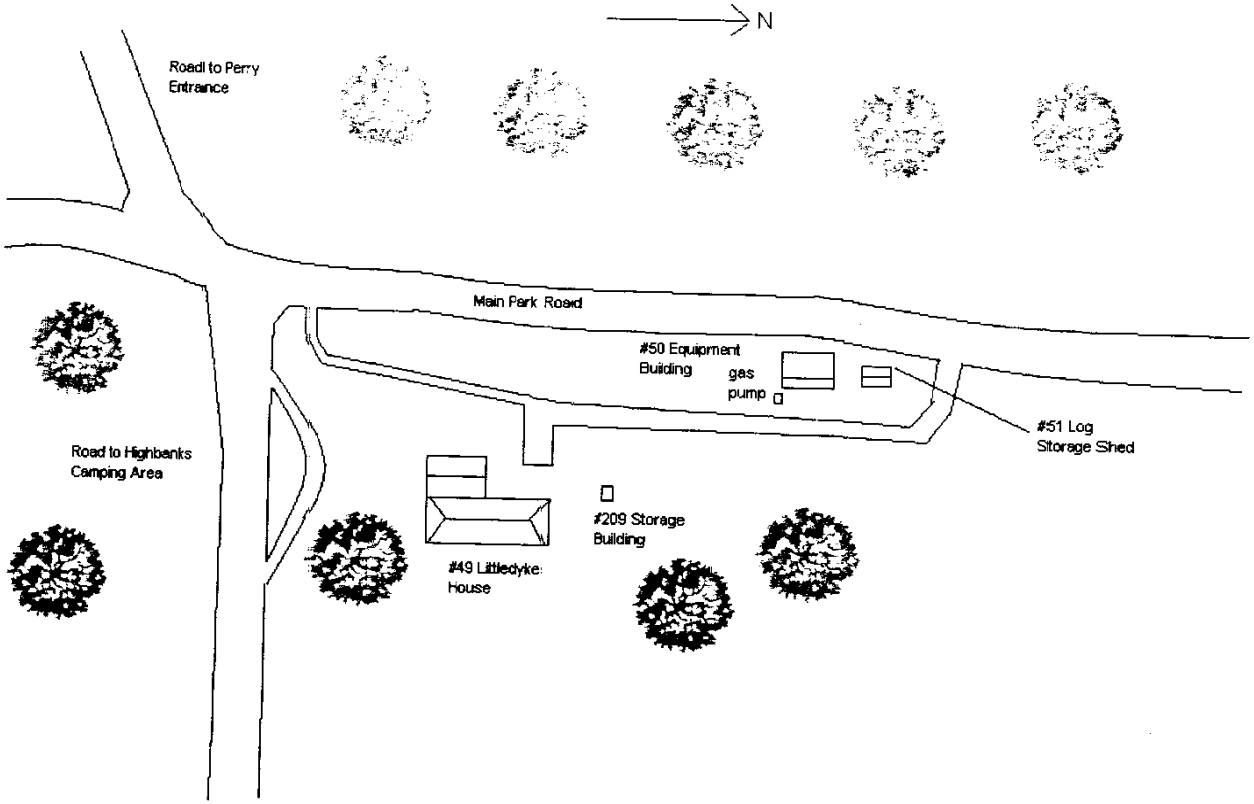
Number 30- St. Helena Loop B Area



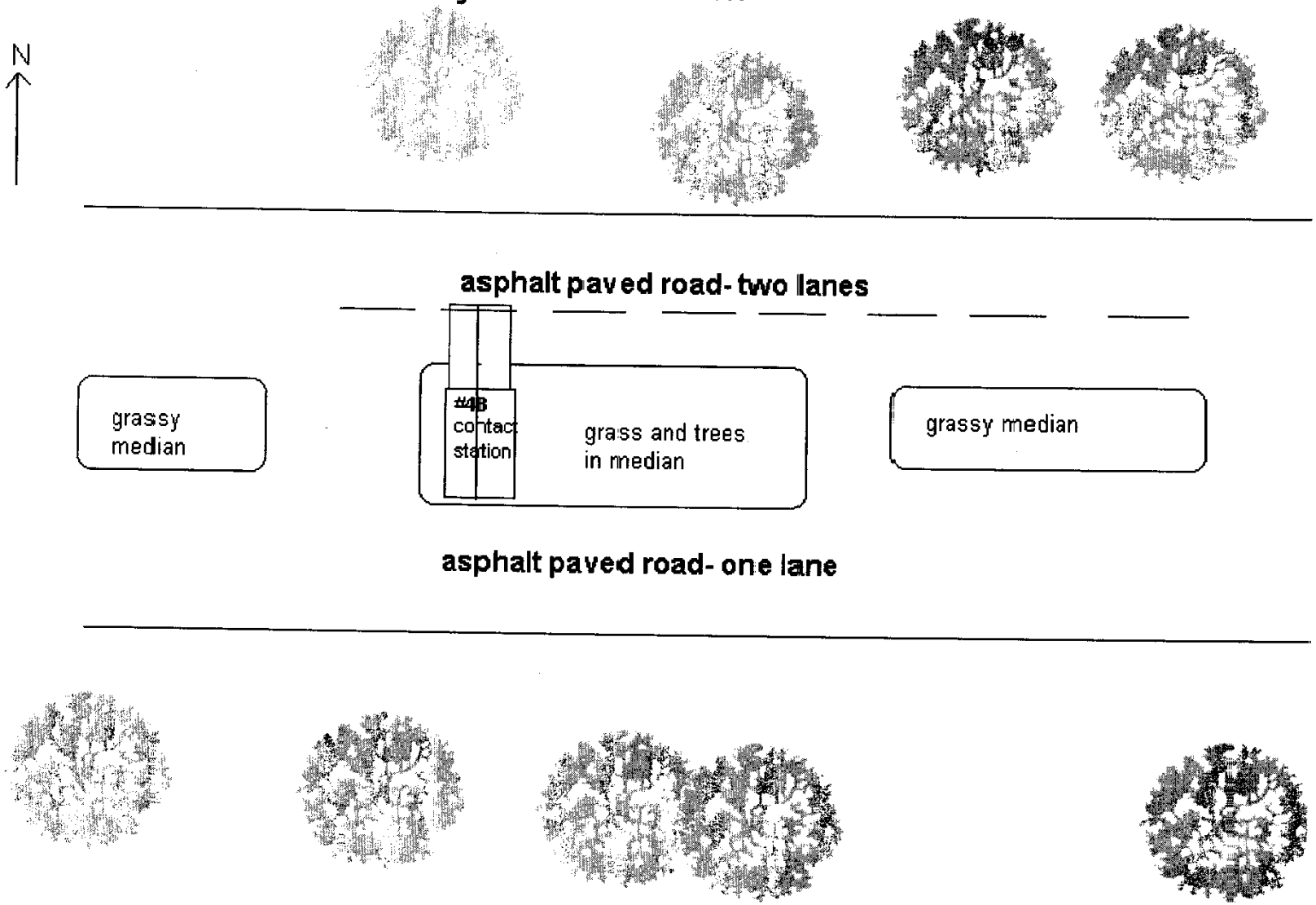
Number 31- St. Helena Loop C Area



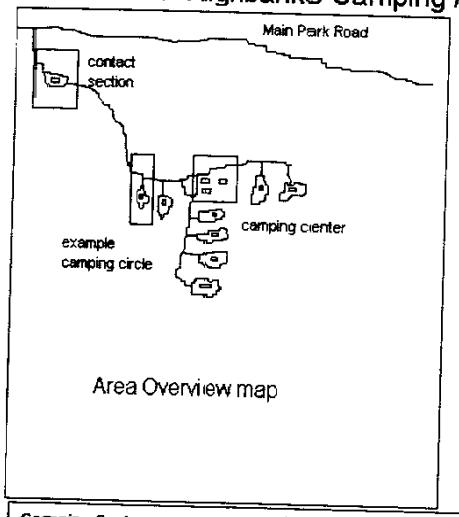
Number 32- Littledyke House Area

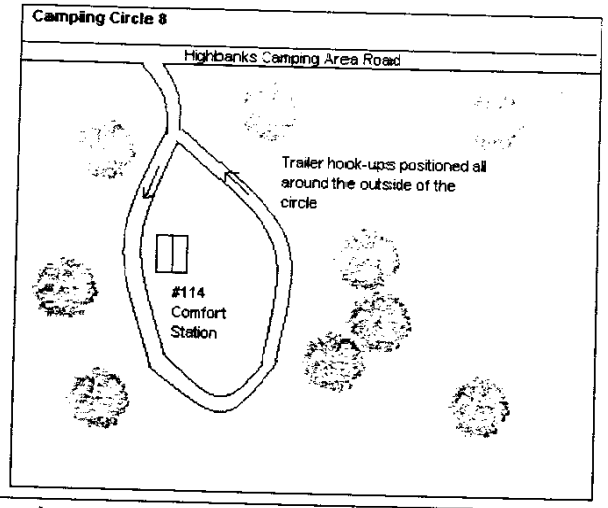


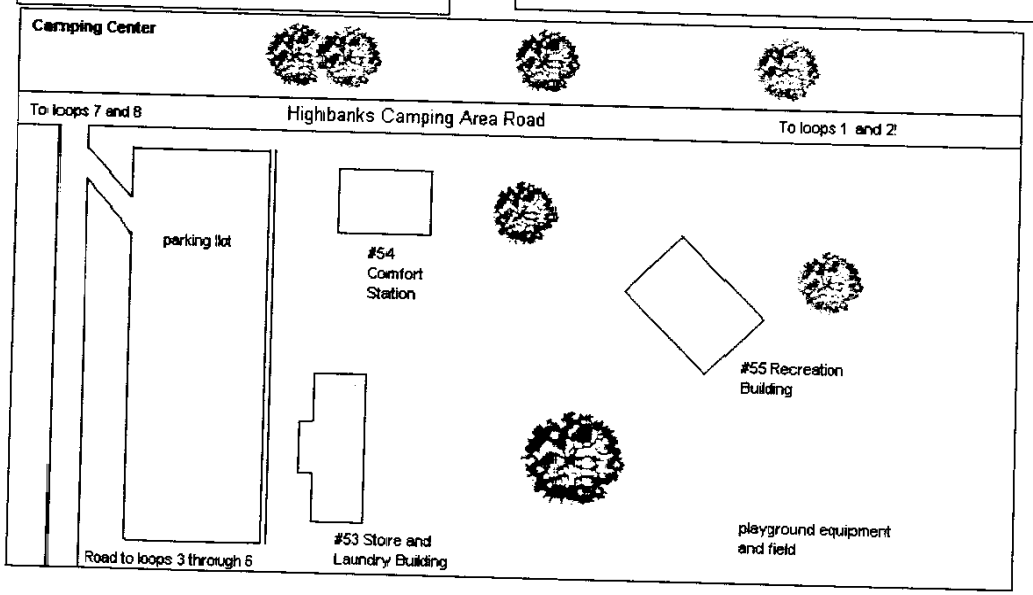
Number 33- Perry Contact Station

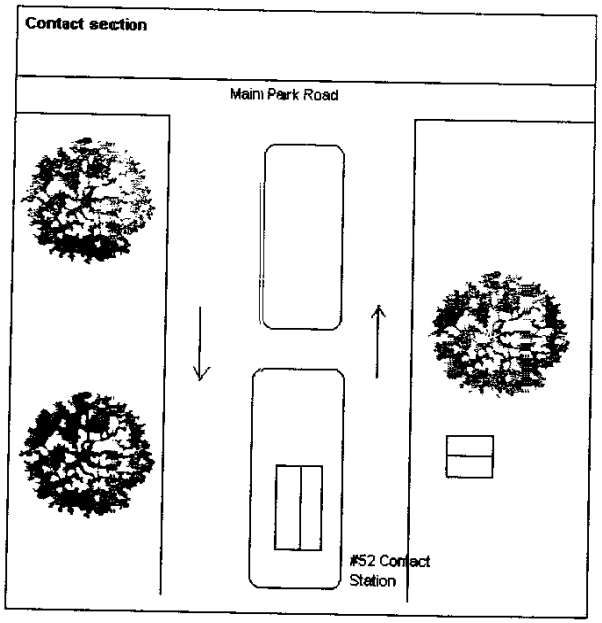


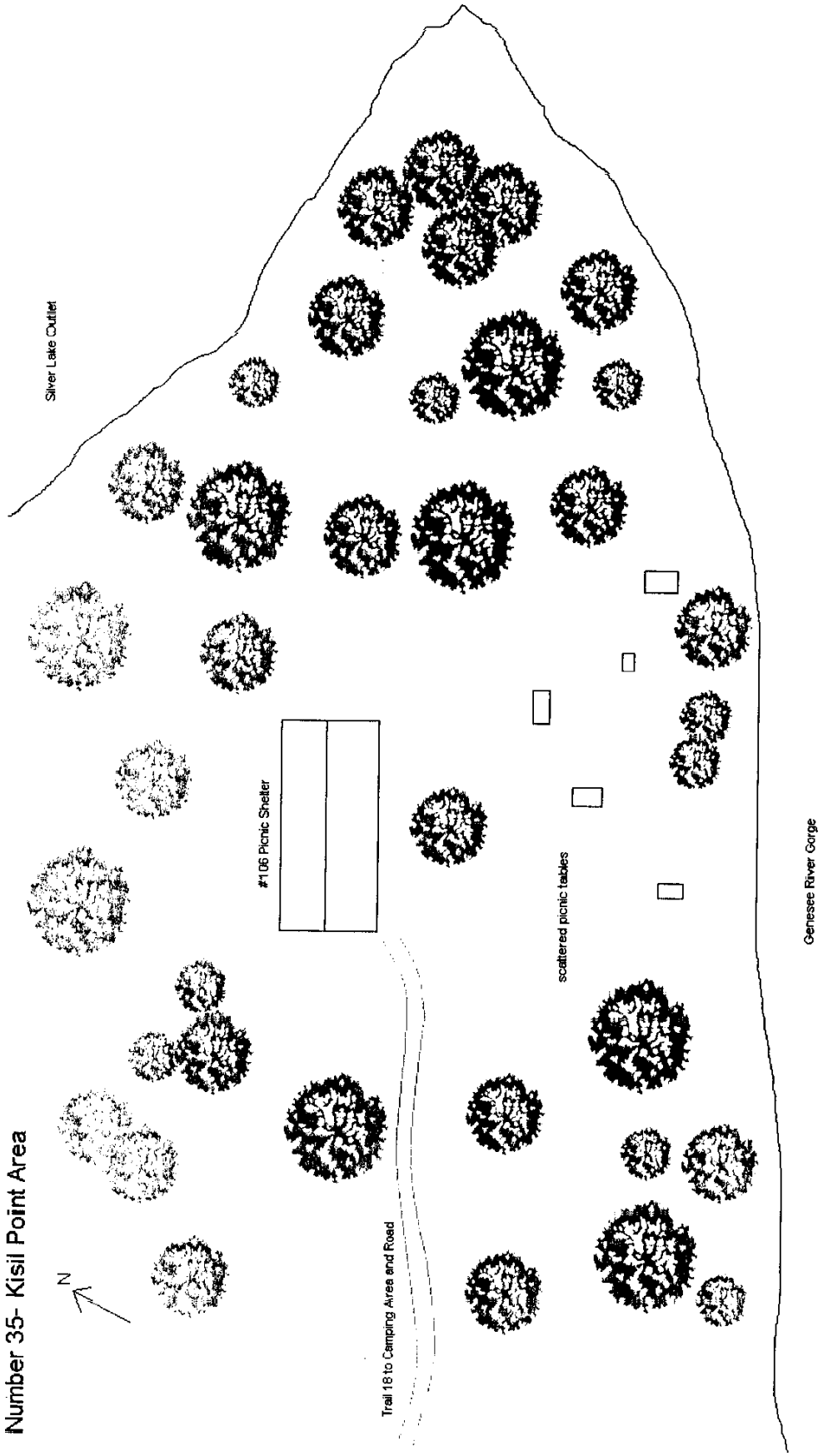
Number 34- Highbanks Camping Area



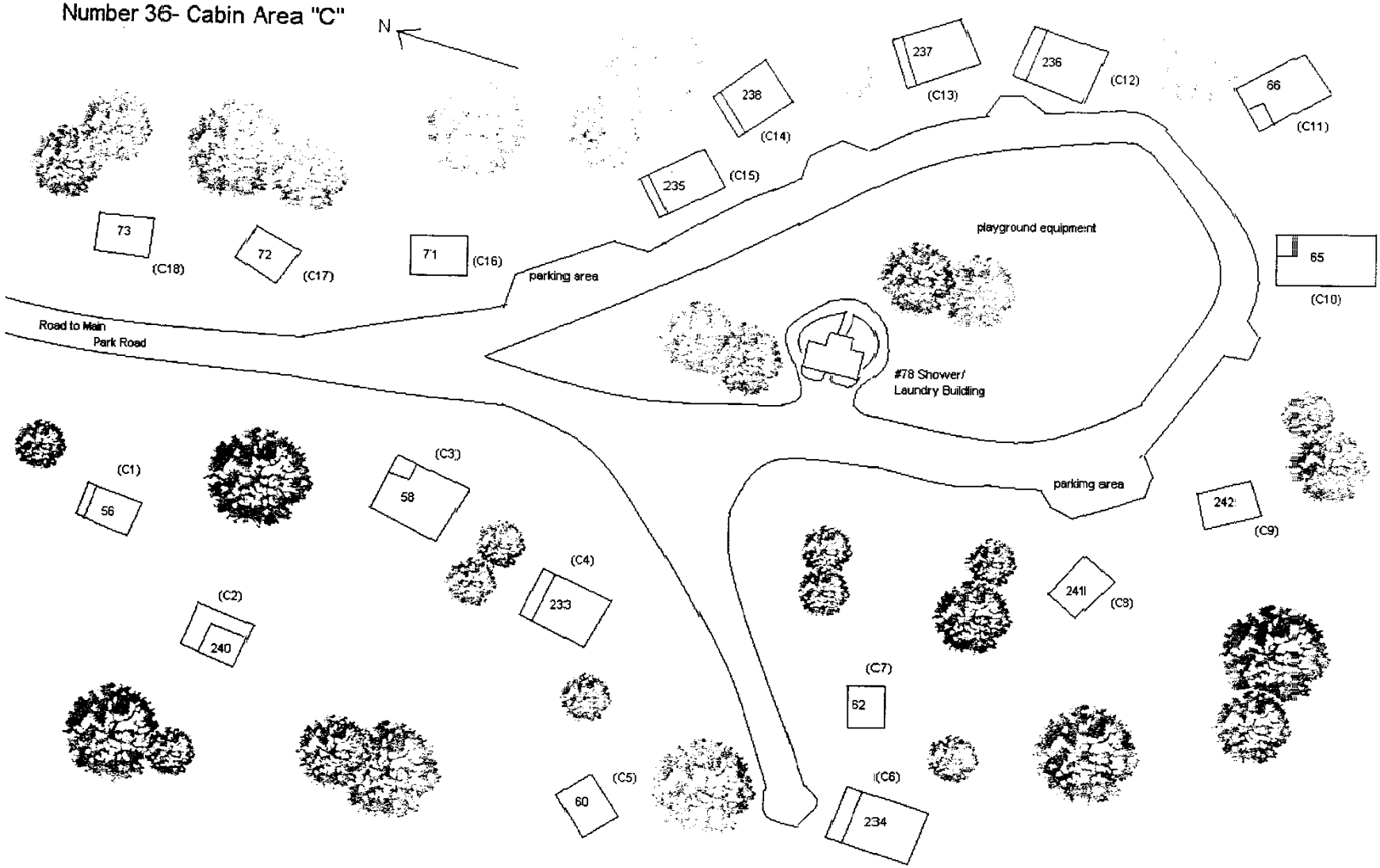




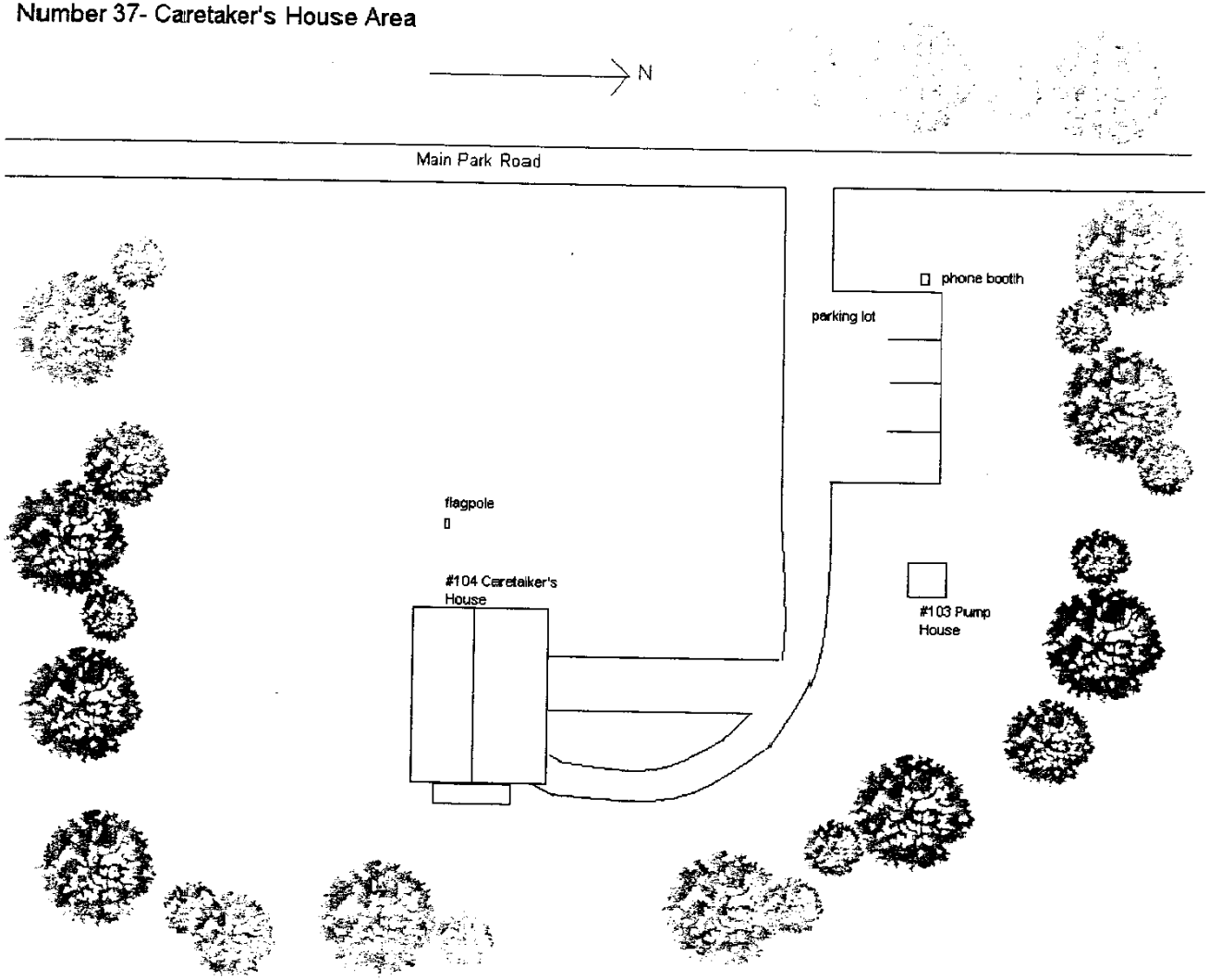



Number 35- Kisil Point Area
N
Silver Lake Outlet
#106 Picnic Shelter
Trail 18 to Camping Area and Road
scattered picnic tables
Genesee River Gorge

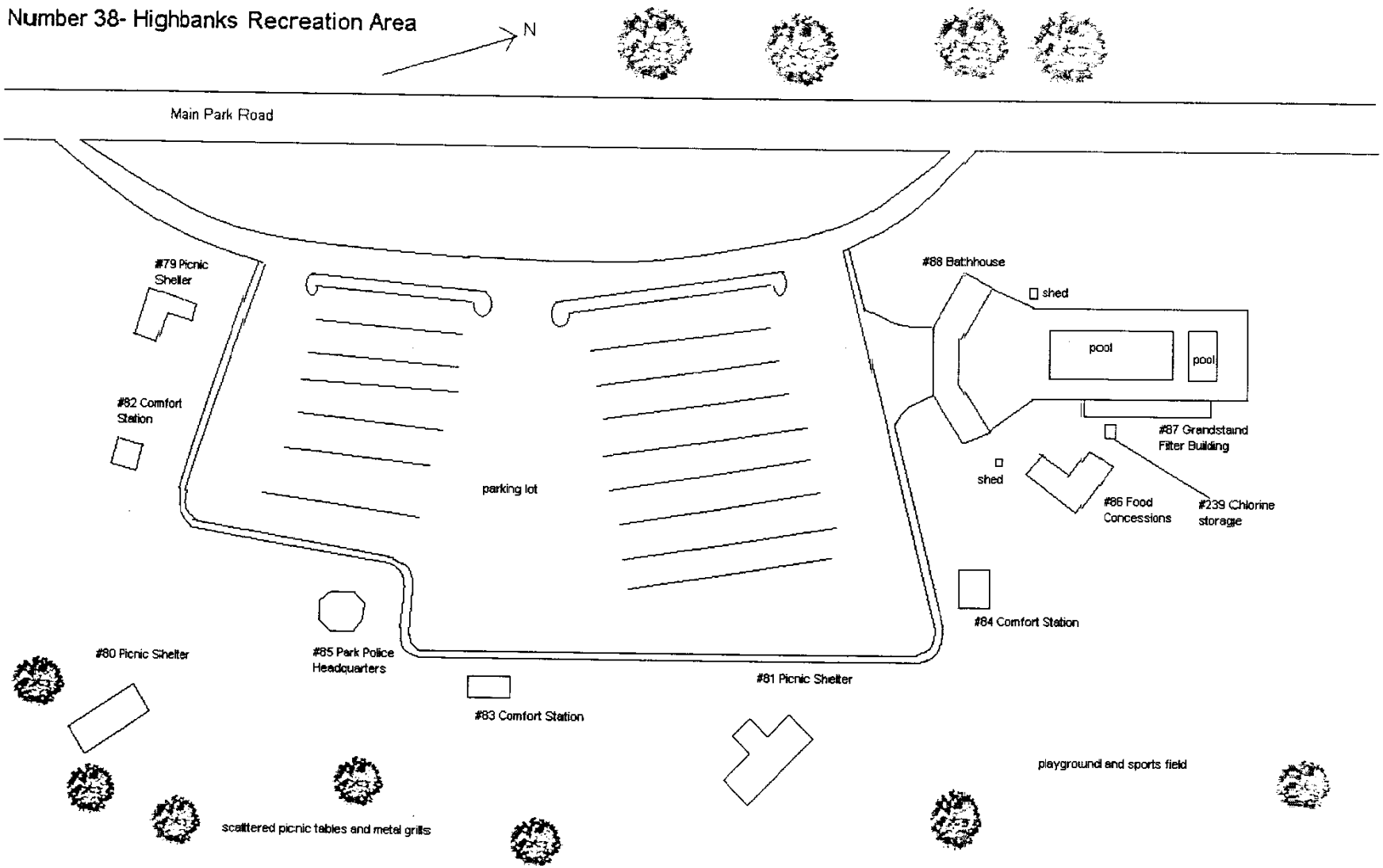
Number 36- Cabin Area "C"



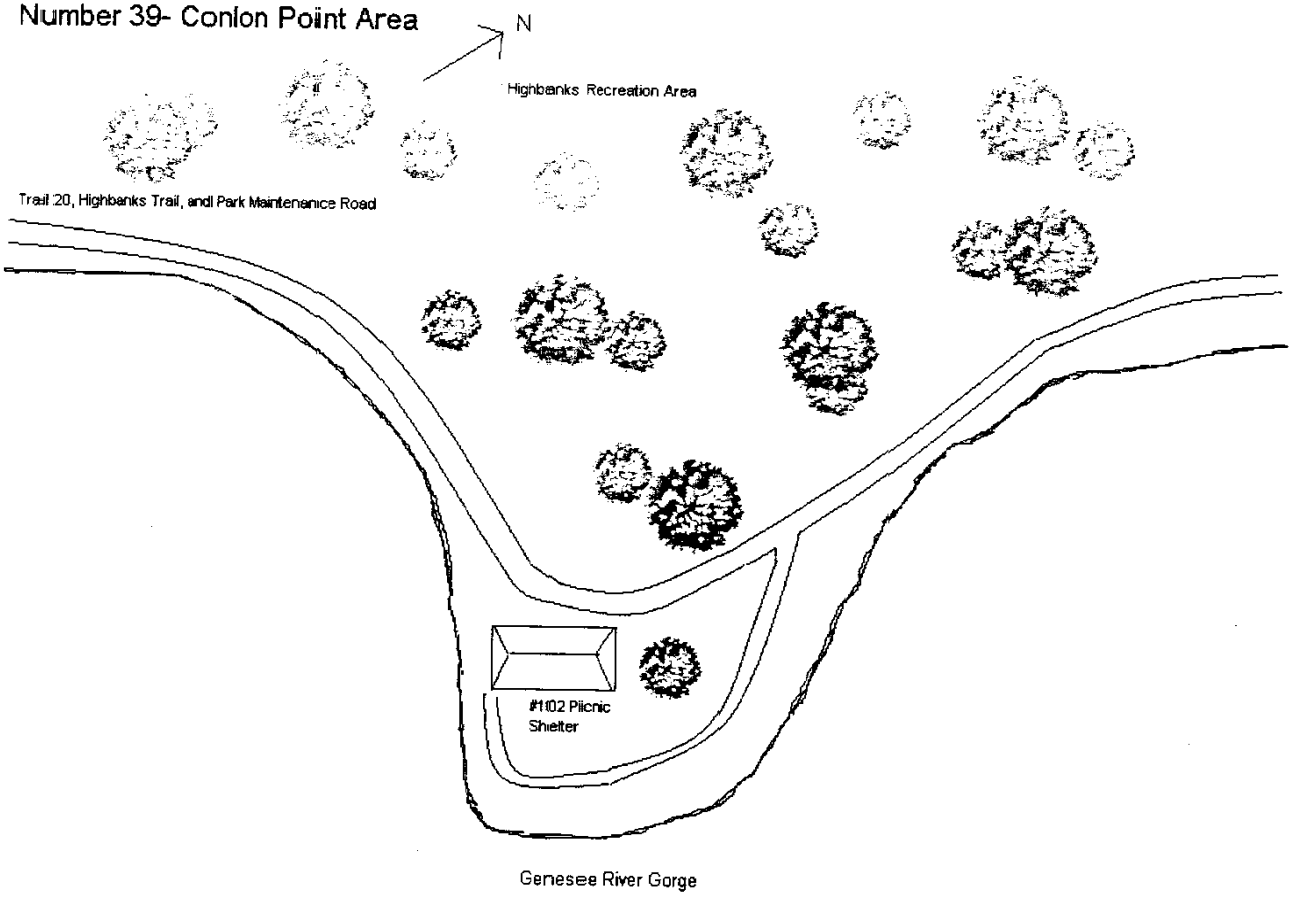
Number 37- Caretaker's House Area



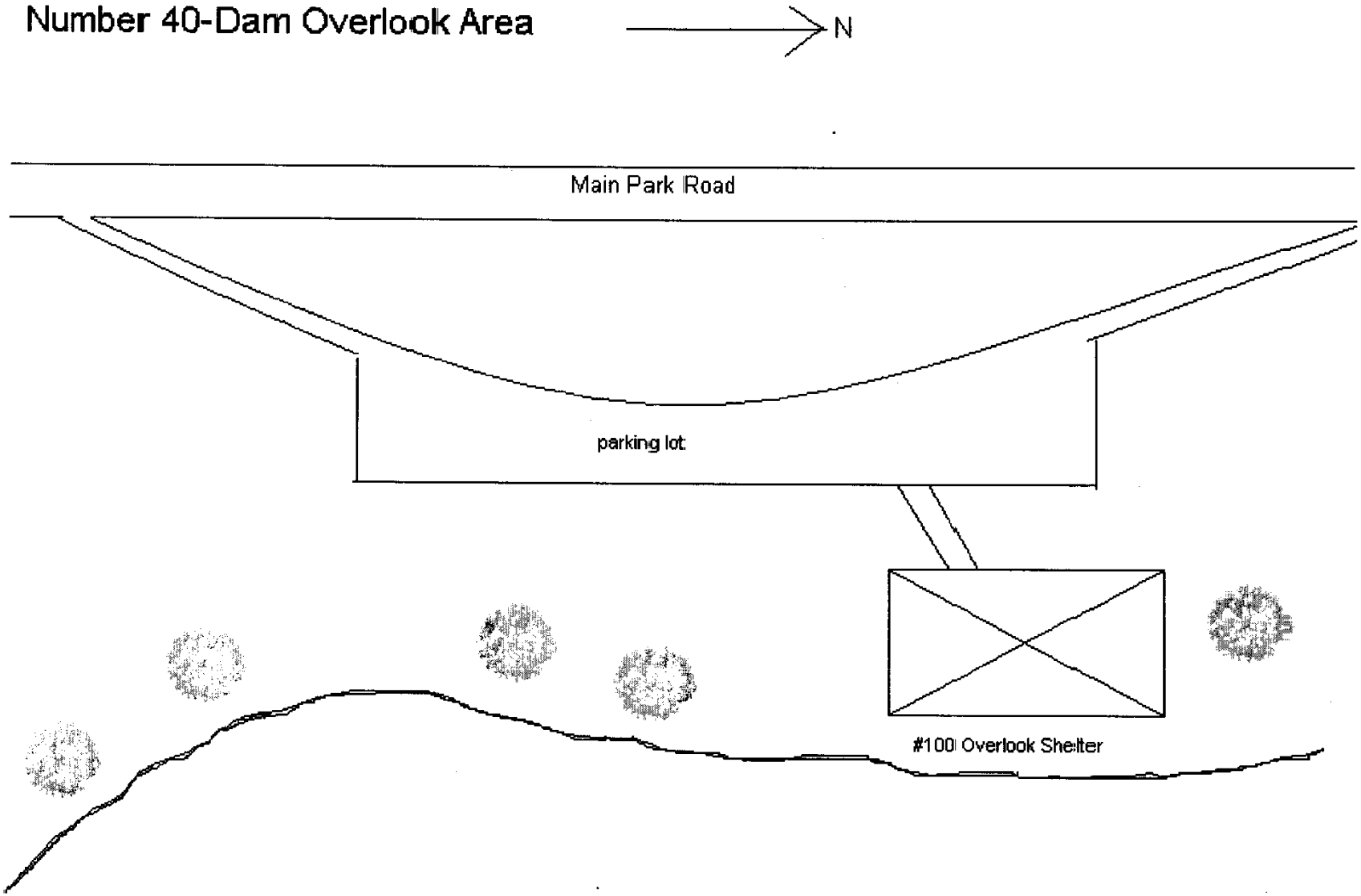
Number 38- Highbanks Recreation Area



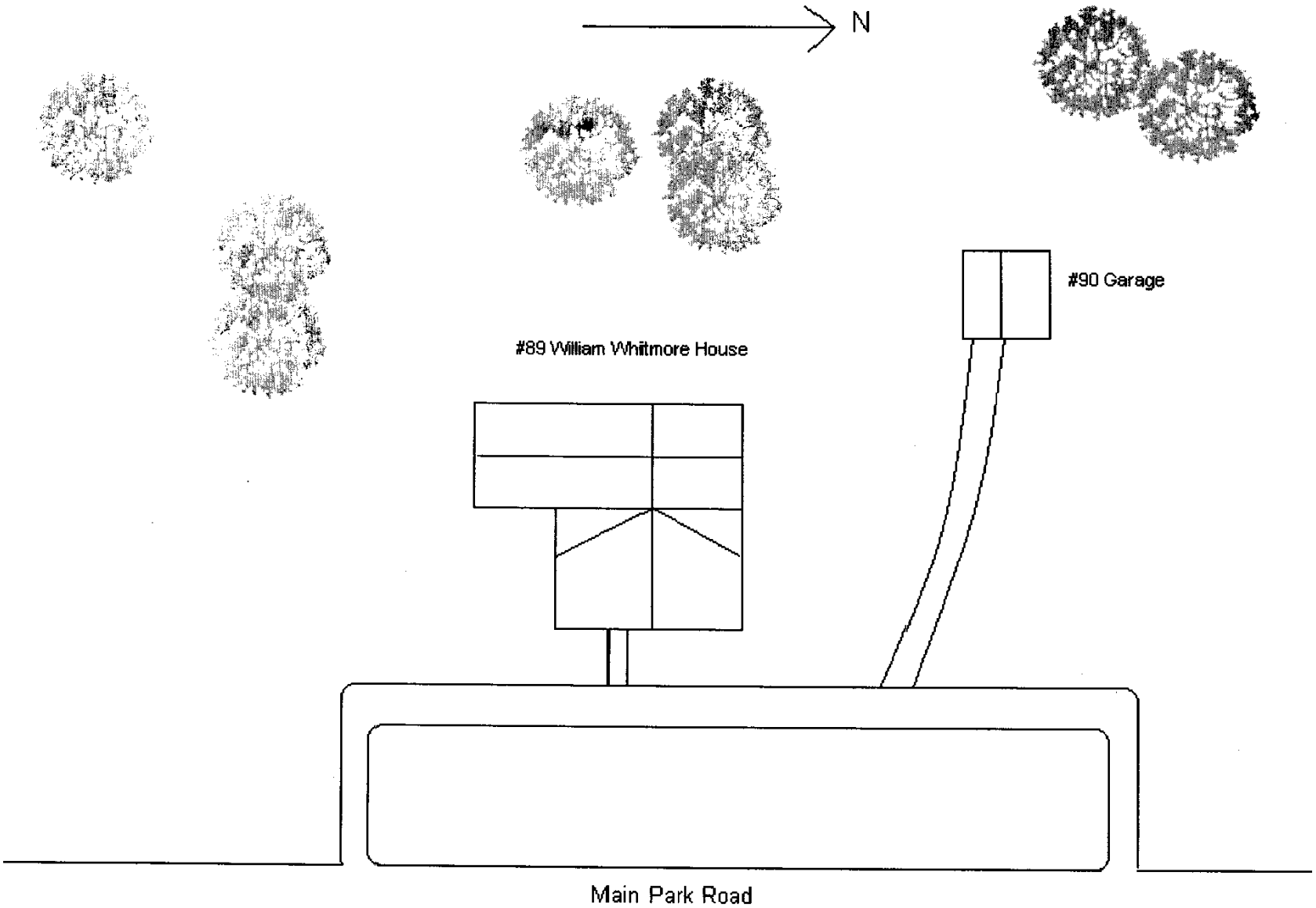
Number 39- Conlon Point Area



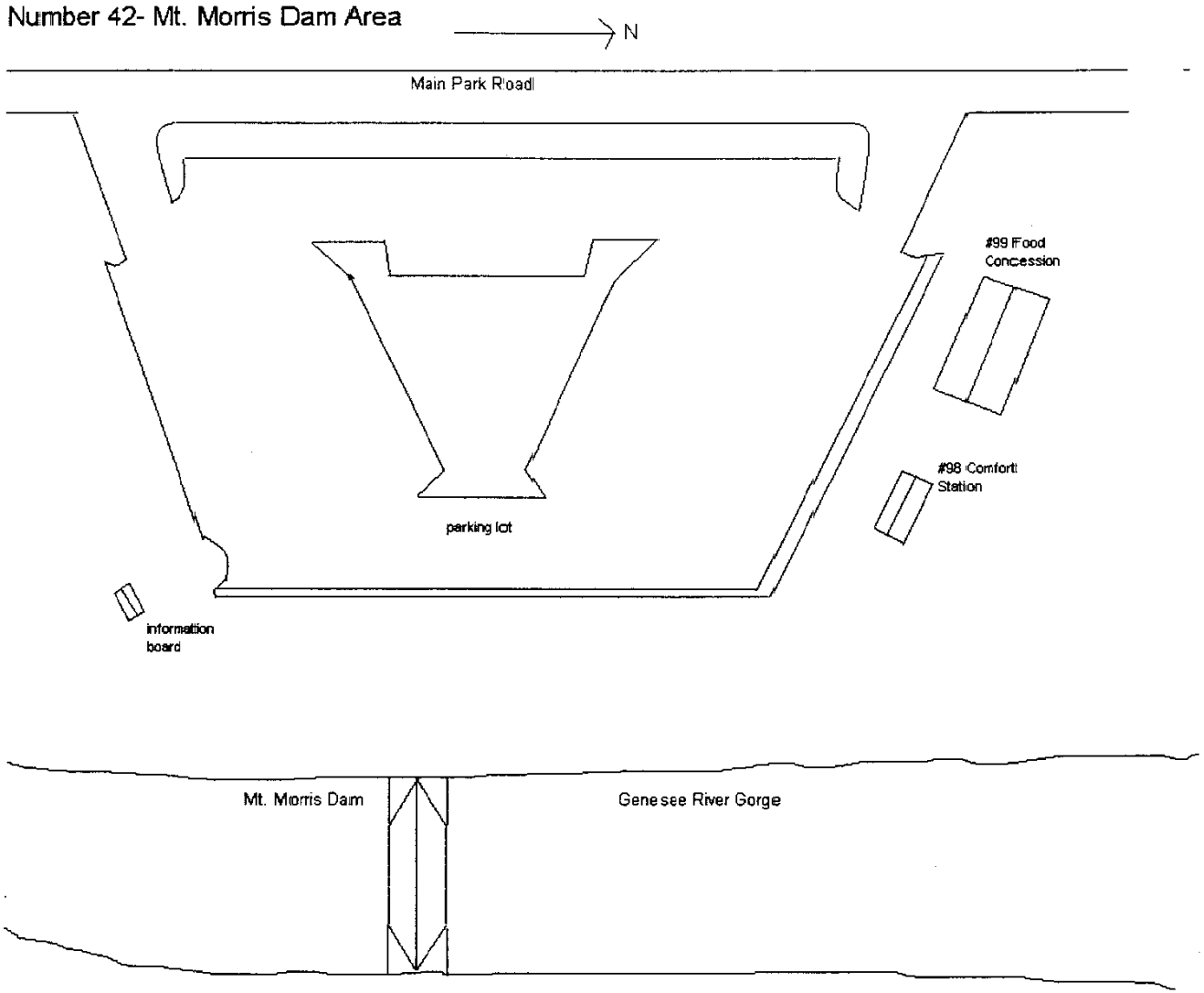
Number 40-Dam Overlook Area



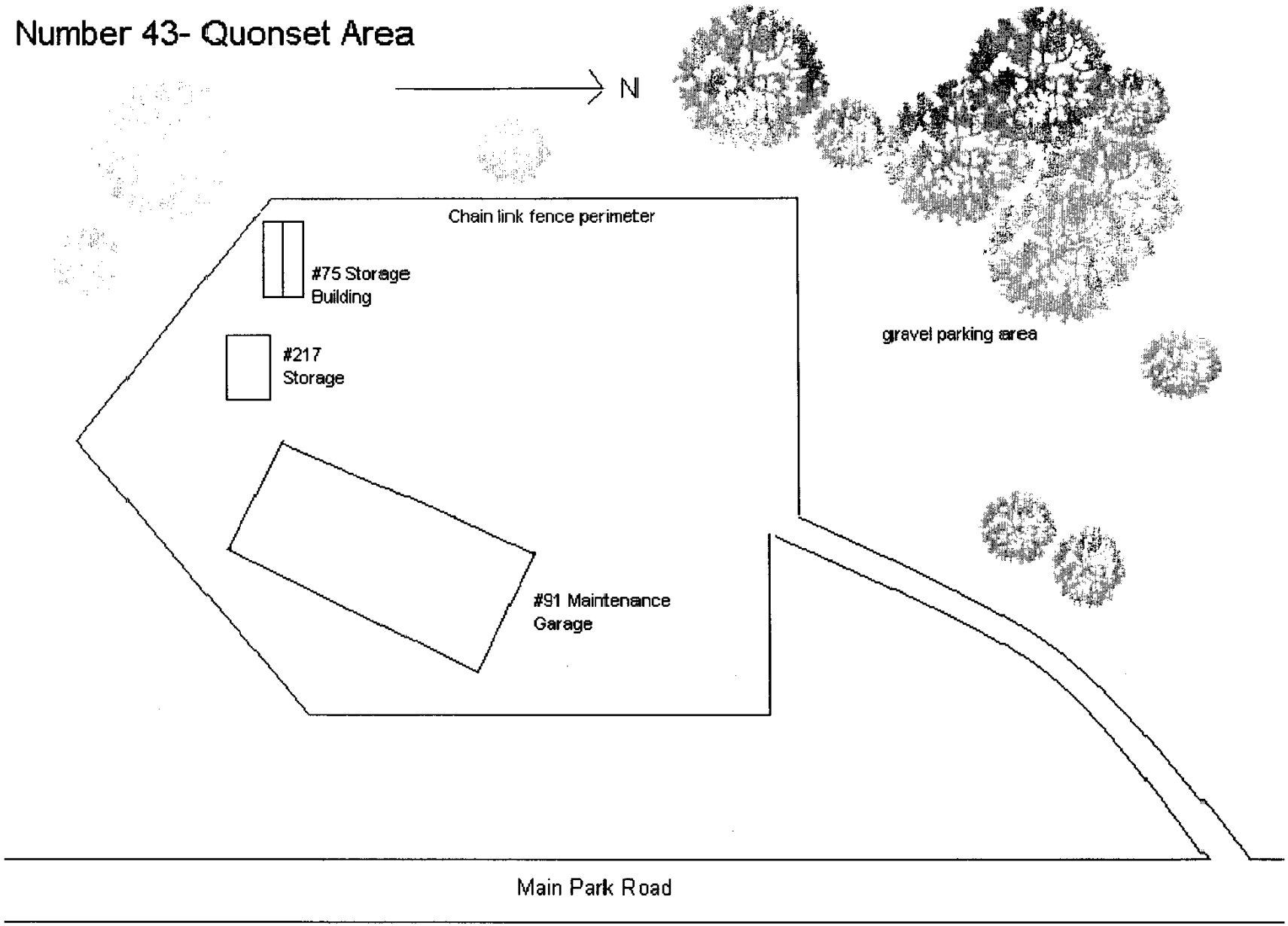
Number 41- William Whitmore House Area



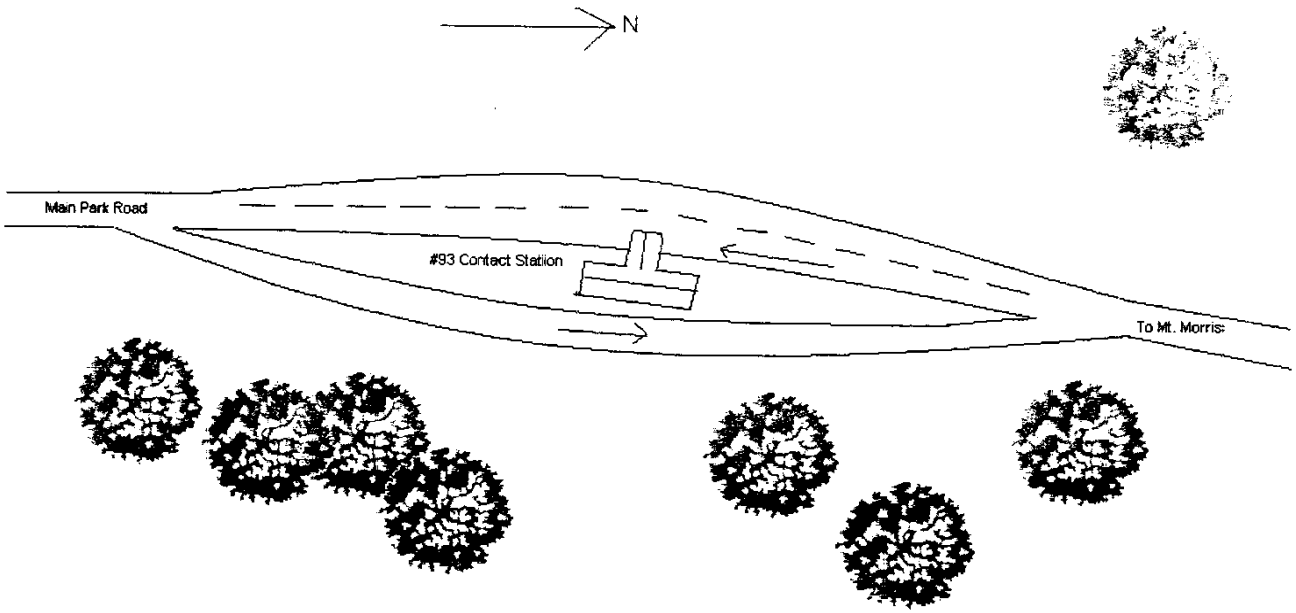
Number 42- Mt. Morris Dam Area



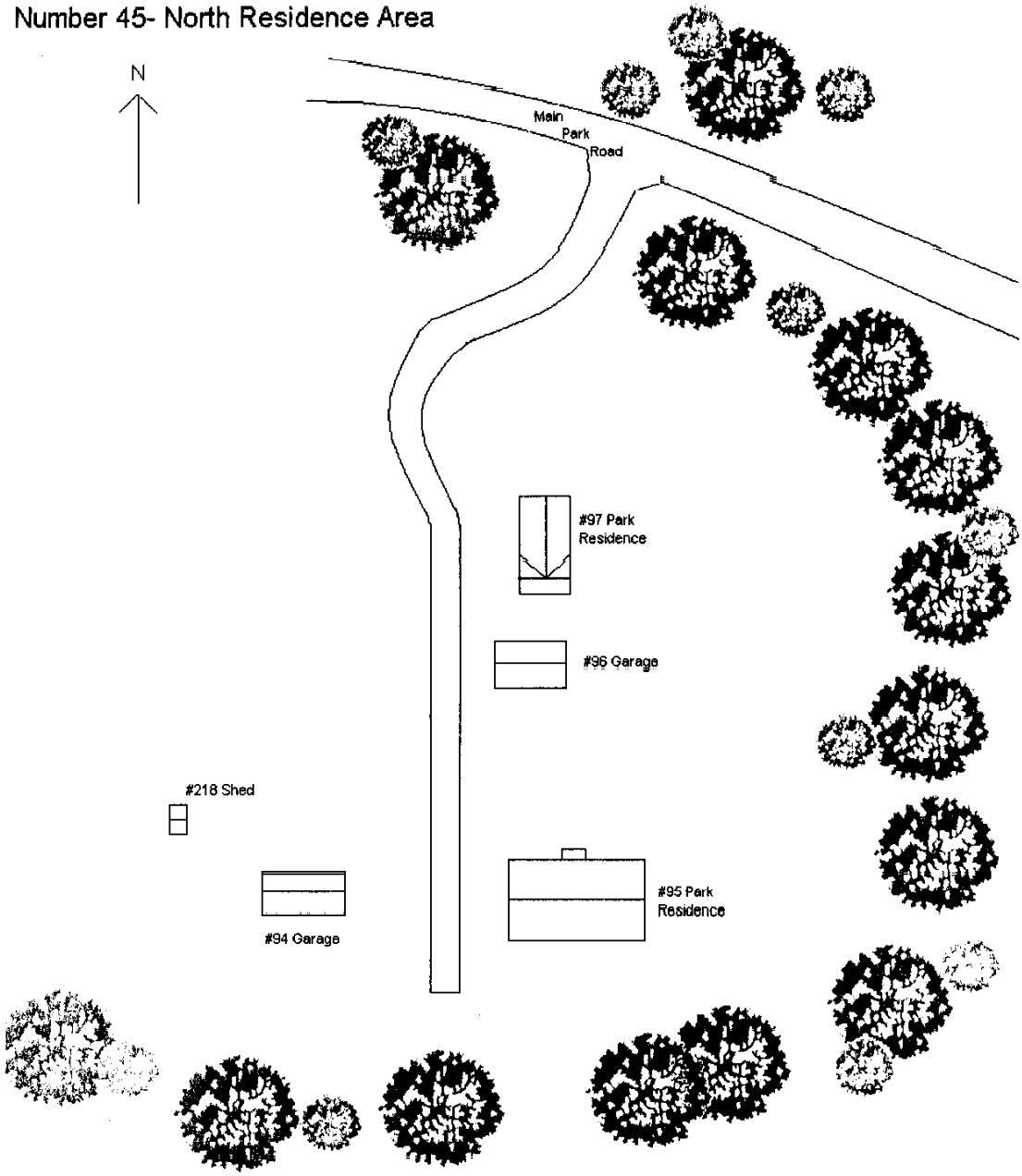
Number 43- Quonset Area



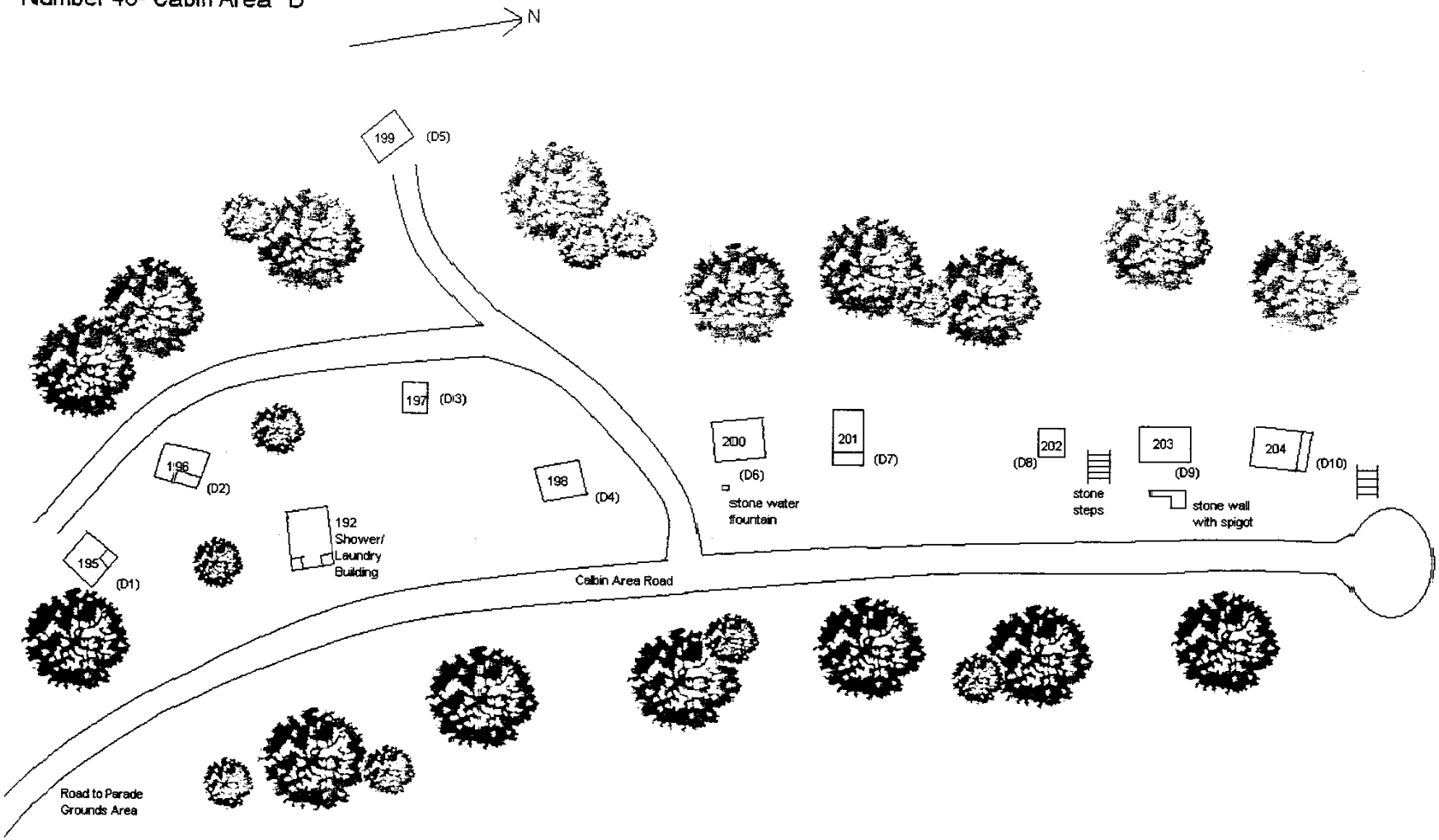
Number 44- Mt. Morris Entrance Area



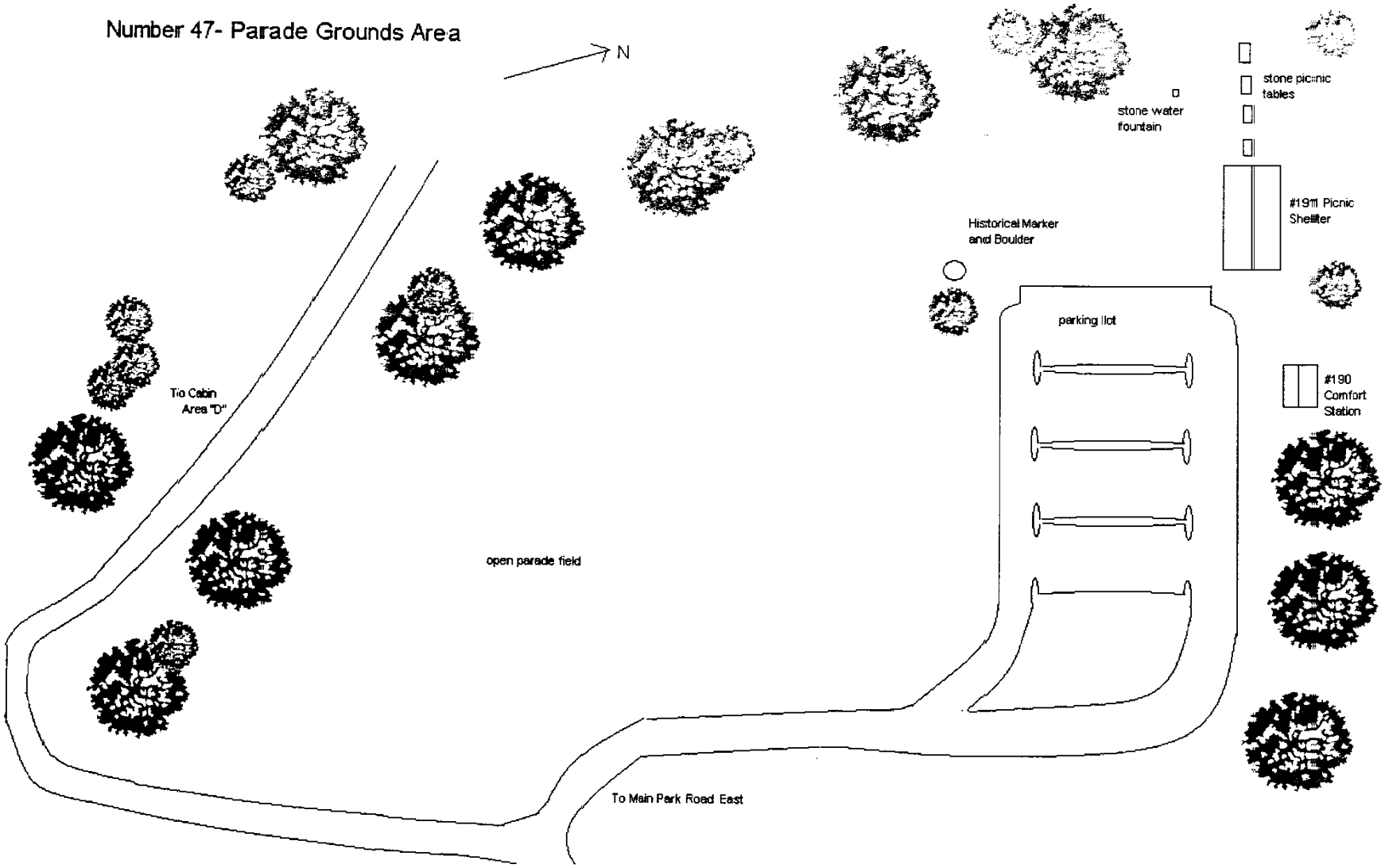
Number 45- North Residence Area



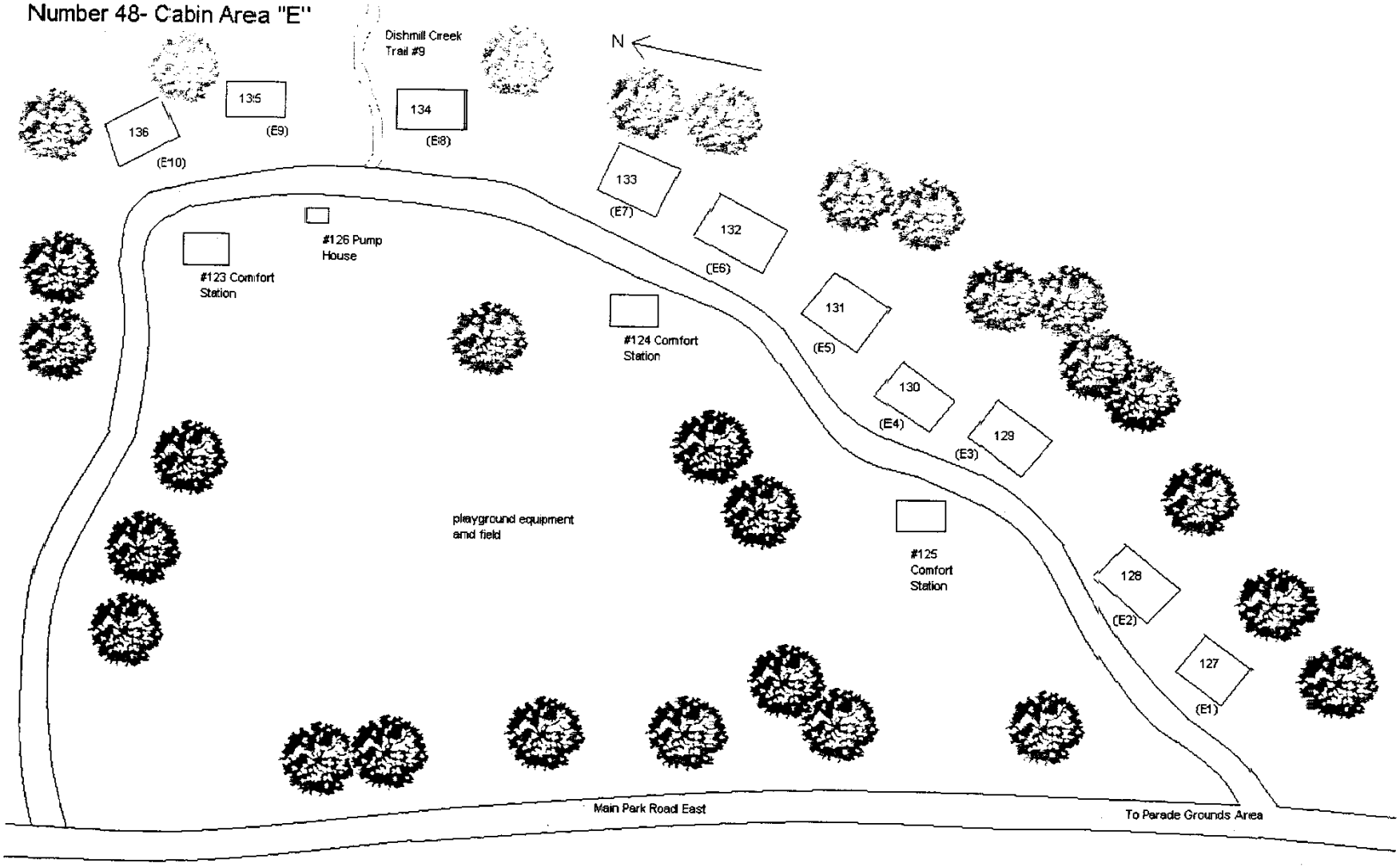
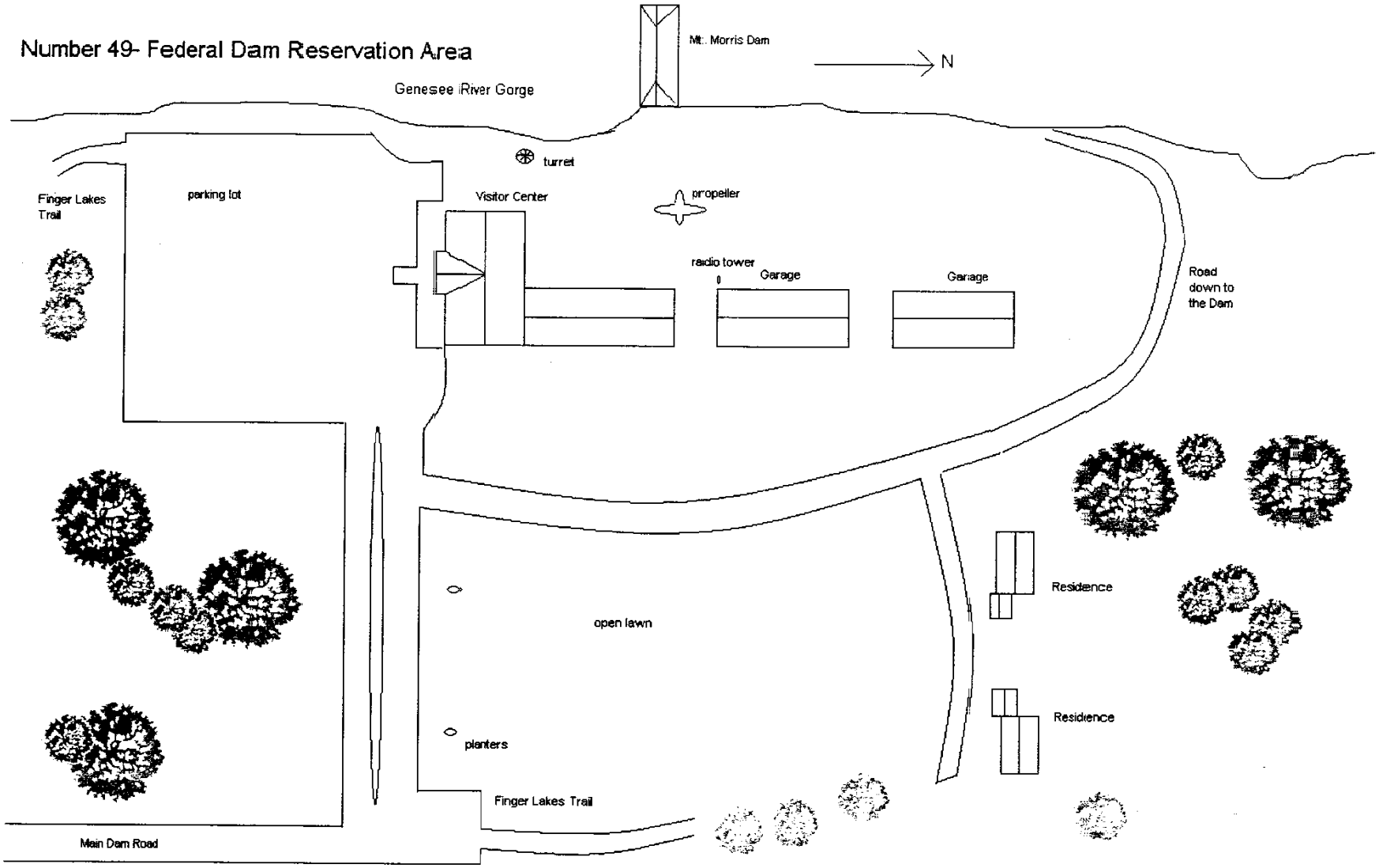
Number 46- Cabin Area "D"



Number 47- Parade Grounds Area



Number 48- Cabin Area "E"



Number 49- Federal Dam Reservation Area