



**Parks, Recreation
and Historic Preservation**

ANDREW M. CUOMO
Governor

ROSE HARVEY
Commissioner

June 12, 2018

John M. Kahabka
New York Power Authority
Vice President
Environment Health and Safety
123 Main Street
White Plain, NY, 10601
(via email)

Re: NYSCC/NYPA
Static Display of the Tugboat URGER
Lock 13/Taste NY, NYS Thruway (Milepost 187 WB), Root, Montgomery County
18PR03439

Dear Mr. Kahabka:

Thank you for requesting the comments of the Office of Parks, Recreation and Historic Preservation's Division for Historic Preservation (DHP). 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). These comments are those of this office and relate only to Historic/ Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8) and its implementing regulations (6 NYCRR Part 617).

First, let me note that our office has already been in contact with your cultural resource consultant regarding potential Native American archaeology at the project site. We understand that your agency is currently undertaking archaeological assessment within the project's area of potential impacts. We will review and comment on those findings once submitted to our office.

Regarding the tugboat URGER, as you are aware the vessel was listed in the New York State and National Registers of Historic Places in 2001 as a resource of State-wide significance. It is one of only 27 vessels designated to the registers in New York State.¹

The National Register nomination for the URGER states that the tugboat was nominated under "*Criterion A for her long and historic association with the development of New York State's twentieth century canals.*" She also satisfies Criterion C as a representation of evolving twentieth century marine technology Urger moved state dredges, Derrek boats, barges, and scows, primarily on the Champlain Canal and eastern portion of the Erie Canal, from 1922 through

¹ There are 6,200 individual listed properties and historic districts on the State and National Registers in New York. These listings include more than 95,000 individual buildings, structures, objects and sites. Within this number only 27 are vessels.

1986 when she was retired from service. The 100-year old tugboat now serves as the canal system's ceremonial flagship, serving as a platform and focal point for educational programs, historic interpretation, and celebrations in canal-side communities throughout upstate New York."

The URGER was also directly referenced in the National Park Service's National Historic Landmark designation of the New York State Barge Canal Historic District (NR Listed 2015, NHL 2016). This document states: "The DPW purchased the Urger, a second-hand Great Lakes tugboat, launched in 1901. (Today, after decades of hard work, that boat remains in service as *the canal system's flagship and ambassador.*)"² The Landmark designation goes on to state that "the Canal Corporation developed harbors and facilities for recreational boaters and a cross-state trail along the banks of the Erie. It was also charged with facilitating community and *economic development with a recognition of the canal system's historical significance.* Soon after it took control, the Canal Corporation took the 1901 tug Urger out of retirement and repurposed the old workhorse as a floating ambassador that participates in school programs and public events throughout the state's waterways."³

These designations and references to the significance of the tugboat URGER reinforce the opinion of our office that this historic vessel is one of New York State's preeminent and unique historic resources. As such, the proposal to remove the historic vessel from its water setting and create a land-based static exhibit with her, albeit it close to the canal, will nevertheless have an unquestionable and profound direct Adverse Impact on the National Register listed tugboat. (9NYCRR Part 428.7(2 & 3))

We also note that with her prominent mention and historic connection to the National Historic Landmark, the proposed removal and display may also adversely affect that significant resource as well.

Because of this determination and pursuant to 9 NYCRR Part 428.8, our Division requests the following information in order for us to progress the required §14.09 (NYSPRHPL) consultation process:

- Current structural or engineering conditions survey of the URGER to better understand the rationale for removing the historic resource from operational use on the canal.
- Documentation showing any consideration for alternate canal locations for the static exhibit and any assessment of an in-water exhibit at Lock 13 (or other location) vs. land based exhibition.
- Annual maintenance budget (expenses) to maintain the URGER as an operating vessel along the canal (3-5 years of data requested)
- Project estimate for planning and construction of proposed static exhibit. Please include both hard and soft costs such as archaeological survey and engineering expenses.
- Projected annual budget line for maintenance for both the historic vessel and its proposed viewing structure and associated fixtures (lighting, security system, etc.).
- Any programmatic changes or regulations that would bar the URGER from remaining a floating resource and continuing her role as an "ambassador" and educational resource for the State canal system.

² New York State Barge Canal National Register of Historic Places Nomination Form and National Historic Landmark Documentation. April 2014.

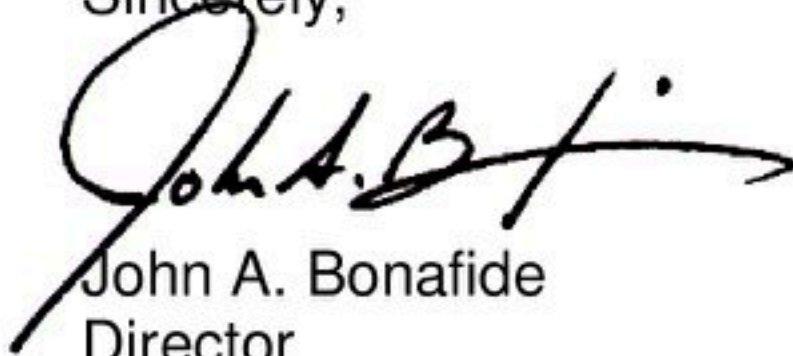
³ Ibid. Section 8, Page 54.

- Any archaeological assessment or survey report(s) produced in connection with the planning or development of the site for this undertaking.

Once we have received the requested additional information, we will then be able to better offer recommendations as required under 9 NYCRR Part 428.8(b). Our recommendations should then be explored as you consider prudent and feasible alternatives that might avoid or minimize the Adverse Impact to the URGER and the NHL.

If I can be of any further assistance I can be reached at john.bonafide@parks.ny.gov or (518) 268-2166.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Bonafide". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping underline.

John A. Bonafide
Director,
Technical Preservation Services Bureau
Agency Historic Preservation Officer

cc: Robert F. Panepinto, NYPA (via email)
John Callaghan, NYSCC (via email)
Elizabeth Novak, NYTA (via email)
Robert Radliff, NPS-ECWHA (via email)