



**Parks, Recreation,  
and Historic Preservation**

**ANDREW M. CUOMO**  
Governor

**ERIK KULLESEID**  
Commissioner

November 26, 2019

Ms. Elizabeth Myers  
Project Manager  
Maser Consulting  
18 Computer Drive East  
Suite 203  
Albany, NY 12205

Re: DEC  
Forefront Varano Solar Project  
279 Maple Avenue, Goshen, NY  
19PR00469

Dear Ms. Myers:

Thank you for requesting the comments of the Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted materials in accordance with the New York State Historic Preservation Act of 1980 (section 14.09 of the New York Parks, Recreation and Historic Preservation Law). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources. 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 (6NYCRR Part 617).

OPRHP has reviewed:

*Phase 1 Archaeological Survey, Varano Solar Project, Town of Goshen, Orange County, New York* (Public Archaeology Facility, 28 January 2019),

and

*Phase 1 Archaeological Survey, Varano Solar Addendum Project, Town of Goshen, Orange County, New York* (Public Archaeology Facility, 21 October 2019).

Two previously unrecorded precontact archaeological sites have been identified:

07106.000209      Varano Precontact Site  
07106.000210      Persoon Precontact Site

Both sites may be eligible for listing on the State and National Registers of Historic Places.

The applicant has chosen to avoid both sites by implementing impact minimization measures, including:

“All access roads, subsurface utilities, grubbing/grading, stormwater management areas and any other substantial ground disturbing impacts have been removed from sensitive areas on proposed construction plans.”

---

**Division for Historic Preservation**

P.O. Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • parks.ny.gov

And further that the solar panels will be supported with “metal posts driven into the ground. No excavation, augering, or poured concrete will be used to construct the support system. Further, no surface-ballast systems will be used.”

The applicant has submitted an “Archaeological Site Impact Avoidance Plan” (Maser Consulting, October 2019), describing short- and long-term site protection measures, plus accidental discovery and human remains discovery protocols. (Please note that the OPRHP contact for this project is Philip Perazio, not Josalyn Ferguson).

Therefore, contingent on the successful implementation of the preceding site avoidance measures, OPRHP recommends that the planned project will have No Adverse Impact on historic properties, including archaeological and architectural resources, listed or eligible for listing on the State and National Registers of Historic Places.

If you have any questions, please don't hesitate to contact me.

Sincerely,



Philip A. Perazio, Historic Preservation Program Analyst - Archaeology Unit

Phone: 518-268-2175

e-mail: [philip.perazio@parks.ny.gov](mailto:philip.perazio@parks.ny.gov)

via email only

cc: Susan Bachor, Delaware Tribe  
Bonney Hartley, Stockbridge-Munsee  
Dana Kelly and Erin Thompson, Delaware Nation  
Laurie Miroff and Nina Versaggi, PAF  
Charles Vandrei and David Witt, DEC