

## ***Stockbridge-Munsee Tribal Historic Preservation***

*Main Office*  
W13447 Camp 14 Rd  
Bowler, WI 54416

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86 Spring St  
Williamstown, MA 01267

September 21, 2021

Mr. David Witt  
Indian Nations Affairs Coordinator  
Office of Environmental Justice  
New York State Department of Environmental Conservation  
270 Michigan Avenue  
Buffalo NY 14203

***RE: 21PR05575 2nd Avenue Troy Planned Development***

Comments on Hartgen Archaeological Associates Combined Phase IB and Phase II Archaeological Report

Mr. Witt,

Good afternoon. Thank you for requesting comments from the Stockbridge-Munsee Community Tribal Historic Preservation Office. We have reviewed the combined archaeological Phase IB/Phase II report findings submitted by Hartgen for the proposed 2<sup>nd</sup> Ave Troy Planned Development. We have the following comments.

- The SMC THPO have no concerns with the archaeological report submitted by Hartgen. We concur with the Dickerson Street pre-contact site's eligibility for the National Register and Hartgen's recommendation for site avoidance. Considering project plans have yet to be submitted by the developer, we cannot fully assess appropriate mitigation strategies and ask that no Phase III Data Recovery be conducted until all consulting agencies have had an opportunity to review and comment on project plans.
- SMC THPO concerns with the proposed housing development here would be impacts to both visual and archaeological resources that exist within the project area. The Lansingburgh/North Troy Riverfront Parcel at 1011 2nd Ave has high archaeological sensitivity and cultural significance for the Stockbridge-Munsee Community. Within the boundaries of the project area exists a National Register of Historic Places eligible site, the recorded Dickerson Street Pre-contact Site, which as Hartgen has documented, encompasses a greater space than what had originally been delineated. While portions of the site have been disturbed, intact archaeological deposits remain making it a unique site in North Troy, where nearly all of its river front and green spaces have largely been developed. For thousands of years the site was used for the extraction of resources for lithic tool making and camping along the River. Materials from the site have been identified miles away and represent a crucial component of past social trade networks that linked this region to distant indigenous communities. The site's location on the River situates it across from the Mohican village sites called "Unawats Castle" in North Troy and "Moenemin's Castle" looking across the Hudson at Peebles

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Island in Waterford. Across the river and directly adjacent to the site where the Hannafords grocery store parking lot is now located; human burials have been recorded. These sites in totality represent a landscape of past Mohican life along the River and possess an immense cultural and historic significance for the Tribal Nation today.

- SMC THPO asks for clarification. It is unclear whether Army Corps of Engineers will be involved here. Will Corps permitting be required?

### ***RE: Representation in Consultation***

The Stockbridge-Munsee Mohican Nation is a Federally recognized Tribal Nation. We are distinct from any 501(c)3 or other type of non-governmental entity. We understand that there has been much public attention from concerned citizens and community groups over the proposed *2nd Avenue Troy Planned Development*, particularly from the advocacy groups Friends of the Mahicantuck and the Schaghticoke First Nations, LLC. While these groups may share similar concerns for the cultural resources that exist within the project area at 1011 2<sup>nd</sup> Ave in Troy, the Stockbridge-Munsee Mohican Nation is wholly distinct from their efforts. Stockbridge-Munsee is the only Federally recognized Tribe involved in consultation, and is the only entity that can officially speak for the Mohican people and appropriately represent our ancestral cultural heritage interests. We appreciate their willingness to share information, yet appropriate representation matters as well. It is important for the Nation to continue to assert and maintain its sovereignty and to reiterate the need for the City to engage in Government-to-Government consultation with the Stockbridge-Munsee.

Should you have any questions, you can reach me at [nathan.allison@mohican-nsn.gov](mailto:nathan.allison@mohican-nsn.gov)

Sincerely,



Nathan Allison  
Tribal Historic Preservation Officer and Archaeologist

CC: D. Witt, *NY DEC*  
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M. Drogan, *City of Troy*  
M. Kirk, *Hartgen Archaeological Associates*