



**New York State  
Parks, Recreation and  
Historic Preservation**

**KATHY HOCHUL**  
Governor

**RANDY SIMONS**  
Commissioner *Pro Tempore*

October 25, 2024

Peter Partlow  
Civil/Site Designer  
Aubertine & Currier  
522 Bradley St. A  
Watertown, NY 13601

Re: USACE  
Carleton (Wychoff) Villa  
Town of Cape Vincent, Jefferson County  
24PR01912

Dear Peter Partlow:

Thank you for requesting the comments of the New York State Historic Preservation Office (NYSHPO). We have reviewed the submitted materials in accordance with the National Historic Preservation Act of 1966 (Section 106). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources.

NYSHPO has reviewed the Phase IA Archaeological Survey report for the Carleton (Wychoff) Villa project prepared by Colliers Engineering & Design (CED), Consulting Archaeologists (September 2024; 24SR00536). The report has significant deficiencies which necessitate major revisions. While the function of a Phase IA survey is to conduct a thorough literature review as a basis for determining sensitivity and plan future investigations, the report omits critical information regarding the related historic resources and fails to establish the historical significance of the project area. Without this information, it is impossible to understand the archaeological sensitivity of the project area.

Carleton Island has a long history involving Indigenous, European and American communities. It has been utilized by native peoples for thousands of years as evidenced by several known archaeological sites including burials. During the Revolutionary war, it was a critical British (and allied indigenous groups) military outpost deeply involved in many significant events of the war. Unrest resulted in the island serving as a refuge for Native Americans and loyalists displaced by the conflict. Key known historic resources on the Island include the Fort Haldimand Site (USN 04505.000001), the North Bay Shipwreck (USN 04505.000226), the Carleton Island Provincial Marine Wharf (USN 04505.000268), the Fort Haldimand Military Burial Ground (USN 04505.000227) and the Carleton Island West Site (USN 04505.000220). The project is located amid these interconnected resources and documentary research indicates that the entire area south and southwest of the formal fortifications (including the North and South Bays) functioned as part of the military installation. Research by Dennis R. McCarthy (2020) indicates that the area also contained a full complex of important features related to the functioning of the fort

(naval barracks, storehouses, a block house, roads, gardens, and others). Many are located in the area where direct effects (ground disturbance) are anticipated, others are located in areas where foreseeable indirect effects are anticipated.

NYSHPO requests the following revisions and re-submission of the Phase IA Archaeological Survey report:

- The report and the proposed Area of Potential Effects (APE) fails to consider both “direct” and “indirect” effects on known historic resources. According to the National Historic Preservation Act (NHPA), the APE is defined as the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking (36 CFR 800.16[d]).

It is the opinion of OPRHP that the planned project has the potential for a series of both direct and indirect effects on important historic resources that remain unaddressed by the Phase IA survey report. Direct effects include the actual ground disturbance related to the undertaking. Indirect effects relate specifically to increased numbers of tourists interacting with historic resources (public access) that can have foreseeable negative effects on those resources. Given the unusually high sensitivity of the location and the number of known historic resources in the immediate vicinity, all related to the British occupation of the Island from the Revolutionary War through the War of 1812, these effects must be carefully considered and addressed from the initial phases of our review.

Consequently, NYSHPO has expanded the project APE in CRIS to reflect all potential effects to these historic resources. We request that the revised report explicitly address all available research related to these and all other historic resources such as the Marsh/Folger Farm Historic Site (USN 04505.000182) located within the expanded project APE. The analysis should include a consideration of all previous research, available primary source materials and historic maps related to the fort complex, its individual features, and activities. Many of these sources can be accessed as attachments to the project and related USNs within CRIS.

- The historic background presented in the Phase IA survey report lacks considerable detail and should be expanded to appropriately address the significance of the site. The report omits detailed maps of the fort and surrounding area. These should be georeferenced, reviewed, described in detail. The Precontact history does not place the area in the broader regional context and lacks available detail about the known Precontact sites on the island and prior investigations into them. The discussion of the European presence of the island is similarly lacking details concerning previous investigations of related resources. The Revolutionary War period activity at the fort is well-documented and tied to significant events in the war including British/Native operations in the Mohawk Valley. The report should place the fort complex into the context of the unfolding conflict. This review should include details such as its role in the Burgoyne campaign, its role as a refuge for loyalists and indigenous peoples displaced by the conflict, the impacts of the Sullivan Expedition of 1779 which led to retaliatory actions by troops from the fort led by Sir John Johnson, etc. The participation of Native forces and their residency at the fort and surrounding areas should be addressed in detail. Specific historic persons associated with the fort such as its

commanders and Molly Brant, the sister of British ally and Mohawk leader Chief Joseph Brant should be also discussed. The section on the Wyckoff Villa should also be expanded to provide more biographical information.

- In our letter requesting a Phase IA survey dated 3/28/2024, we specifically noted that due to the sensitivity of the location and the known decades-long history of military activity on this portion of the island, we recommended methods consistent with typical battlefield investigations. We indicated that a detailed Phase IB work plan should be submitted that included testing beyond the standard 15-meter grid of shovel tests. The report does not address this request. The recommendations submitted call for a simple shovel test investigation. Furthermore, it explicitly excludes the existing “environmental conservation buffer and setback”. While this is acceptable for locations without anticipated ground disturbance, it is problematic for locations like the proposed beach expansion where tree removal and other disturbance is expected. Given the military structures reported in the area by McCarthy (2020), which may not be visible above the ground surface and could easily be missed by shovel testing, ground penetrating radar should also be considered. Close interval (7.5-meter) shovel testing is recommended around the previously documented Marsh/Folger Farm Historic Site (USN 04505.000182) and Carleton (Wyckoff) Villa (USN 04505.000267). Since the need for a Phase IB survey is well established, the work scope can be included in the Phase IA report or submitted as a separate document as the consultant prefers.

These comments refer only to the archaeological review. Please note that the project remains under review by our Survey and Evaluation and Technical Services Units. As mandated by Section 106 there will be ongoing consultation with interested Tribal Nations who may have additional comments or concerns.

If you have any questions, I can be reached at [Bradley.Russell@parks.ny.gov](mailto:Bradley.Russell@parks.ny.gov).

Sincerely,



Bradley W. Russell, Ph.D.  
Historic Preservation Specialist – Archaeology

Cc: Peter Partlow (Aubertine & Currier)  
Christopher Fernandez (Colliers Engineering & Design)  
David Newman (New York State Department of State)  
Jessica Hart (NYS Department of Environmental Conservation)  
Margaret Crawford (USACE)  
Ron Clapp (Carleton Villa, LLC)  
Frank Giaquinto (Chairman, Town Planning Board)  
Paul Aubertine (Supervisor, Town of Cape Vincent)