

**LETTER OF RESOLUTION (“LOR”)**

**AMONG THE ERIE COUNTY STADIUM CORPORATION, A SUBSIDIARY OF THE NEW YORK STATE URBAN DEVELOPMENT CORPORATION D/B/A EMPIRE STATE DEVELOPMENT; THE STATE HISTORIC PRESERVATION OFFICE OF THE NEW YORK STATE OFFICE OF PARKS, RECREATION, AND HISTORIC PRESERVATION; THE NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION; AND THE COUNTY OF ERIE**

**REGARDING**

**NEW BUFFALO BILLS STADIUM COMPLEX  
ORCHARD PARK, ERIE COUNTY, NEW YORK**

**WHEREAS**, Western New York’s National Football League franchise known as the Buffalo Bills (the “Team”), currently plays its home games and undertakes all of its operations at Highmark Stadium and its related amenities (the “Current Stadium Complex”) in Orchard Park, New York, which is owned by the County of Erie (the “County”); and

**WHEREAS**, pursuant to the 2013 Master Lease between the County and the Erie County Stadium Corporation (“ECSC”), a subsidiary of the New York State Urban Development Corporation, doing business as Empire State Development (“ESD”), the County leases the “Current Stadium Complex” to ECSC and ECSC, in turn, subleases the Current Stadium Complex to the Bills; and

**WHEREAS**, pursuant to a memorandum of understanding dated March 29, 2022 (the “MOU”), between Buffalo Bills, LLC (together, with its stadium affiliate, the “Bills”), the County and ECSC, and subsequent definitive agreements to be negotiated and executed, the parties have declared their intent to jointly fund, plan and develop a new stadium and related amenities (the “New Stadium Complex”, the “Project”, or the “Undertaking”) in Orchard Park, New York on a site composed of the Current Stadium Complex augmented with County-owned real estate adjacent to the Current Stadium Complex to be transferred for the Project, and

**WHEREAS**, the State of New York has appropriated \$600 million in capital funds, to be administered by ECSC/ESD, toward the estimated \$1.4 billion development of the New Stadium Complex, and

**WHEREAS**, the County has appropriated \$250 million toward the development of the New Stadium Complex,

**WHEREAS**, under the terms of the MOU, the Bills are responsible for contracting/sponsoring planning, design, and construction of the Project in coordination with the County and ECSC and upon the Project’s completion, the land and facilities comprising the New Stadium Complex will be transferred to ECSC, which in turn will lease it to the Bills for its long-term use; and

**WHEREAS**, the County, in accordance with the New York State Environmental Quality Review Act (“SEQRA”), initiated a coordinated environmental review process for the Project by first soliciting/securing lead agency status and administering the preparation of a full environmental assessment form and associated technical analyses to assess the anticipated environmental impacts of the development and operation of the Project; and

**WHEREAS**, the SEQRA Involved Agencies include ECSC/ESD because of their funding, administration, and ultimate ownership of the Project and the New York State Department of Environmental Conservation (“NYSDEC”) because of their regulatory/permitting jurisdiction over components of the Project; and

**WHEREAS**, concurrently with the SEQRA process, ECSC/ESD, in accordance with their obligations under Section 14.09 of New York State Historic Preservation Act of 1980 and its implementing regulations (Article 14 of the New York State Parks, Recreation, and Historic Preservation Law, N.Y. PRHPL §§14.09 *et seq.*, 9 NYCRR Part 428, and associated policies) initiated consultation with the State Historic Preservation Office of the New York State Office of Parks Recreation and Historic Preservation (“OPRHP”) on the potential impacts of the Project on built and archaeological resources that are listed on or are eligible for listing on the State and National Registers of Historic Places (“S/NRHP”), which has been coordinated with the County, the Bills, and NYSDEC; and

**WHEREAS**, the Bills contracted with a qualified consultant in historic resources and archaeology (“Cultural Resources Consultant”) to undertake a Phase IA Literature Search and Sensitivity Assessment (“Phase IA Investigation”) of an established Project Area and has issued this report in draft form, and

**WHEREAS**, with regard to building resources in the Project Area, based upon documentation included in the Phase IA Investigation, supplemental information provided by the Bills and the County, and site visits made by OPRHP, OPRHP has determined that the Current Stadium Complex is not S/NRHP-eligible, and that buildings comprising the Erie Community College South Campus are S/NRHP-eligible, although the Project would result in no adverse impacts to that historic property, and

**WHEREAS**, with regard to archaeological resources, OPRHP, based upon past investigations and review of the draft Phase IA Investigation, concluded that the Project Area includes historic cemeteries including the Sheldon Family Cemetery and that there are sufficient secondary data and documentation demonstrating that portions of the Project Area are sensitive for potentially encountering indigenous archaeological resources and particularly indigenous burials/human remains, and

**WHEREAS**, given the aforementioned sensitivity and upon recommendation from OPRHP (consistent with OPRHP Policy Directive HP-POL-005) and NYSDEC (consistent with NYSDEC Commissioner Policy 42), on August 5, 2022 ECSC/ESD formally sent invitations to the Seneca Nation of Indians, Tonawanda Seneca Nation, and Tuscarora Nation (collectively “the Nations” or “Interested Nations”) to participate in the consultation process related to assessments of impacts to indigenous archaeological resources and burials/human remains vital to the Nations’ heritage.

**WHEREAS**, following meetings with the Nations and in coordination with them, the Bills agreed to direct its Cultural Resources Consultant to undertake activities to interview representatives of the Nations to provide technical input into the Phase IA Investigation prior to issuing it as final and also contracted its Cultural Resources Consultant to undertake Phase IB field investigations in undisturbed portions of the Project Area designated as “Area 1” on Exhibit A, and

**WHEREAS**, ECSC/ESD, OPRHP, NYSDEC, and the County (collectively the “Involved Agencies”) agree that considering the large scale/complexity of the Project and required timeframes for its completion, and the potential to encounter archaeological resources and particularly burials/human remains that would require the implementation of procedures to ensure that such resources are treated with proper reverence and respect, it is desirable to the Involved Agencies to establish a programmatic approach formalized in a letter of resolution (“LOR”) to establish protocols for investigation, review, and treatment

of S/NRHP-eligible indigenous archaeological resources, inclusive of burials/human remains, prior to and during Project construction.

**WHEREAS**, ECSC/ESD has invited the Interested Nations to sign this LOR as Concurring Parties, and

**WHEREAS**, ECSC/ESD has invited the Bills to sign this LOR as a Concurring Party, and

**NOW, THEREFORE, ECSC/ESD, OPRHP, NYSDEC and the County** agree that the Project shall be implemented in accordance with the following stipulations that consider the impacts of the Project on S/NRHP-eligible resources; provided, however, that nothing in this LOR is intended or shall be construed as an endorsement of the Project by the Interested Nations.

### **STIPULATIONS**

**ECSC/ESD WILL ENSURE THAT THE FOLLOWING STIPULATIONS REGARDING ARCHAEOLOGICAL RESOURCES ARE COMPLIED WITH AS PART OF SUBSEQUENT PLANNING, DESIGN AND CONSTRUCTION OF PROJECT COMPONENTS.**

#### **I. INVESTIGATION AND TREATMENT OF ARCHAEOLOGICAL RESOURCES**

##### **A. Interested Nations Input for Completion of the Phase IA Investigation**

1. ECSC/ESD will ensure that Bills and their Cultural Resources Consultant provide representatives of the Interested Nations a reasonable opportunity to provide input to the technical documentation provided in the Phase IA Investigation.
2. Upon the Interested Nations providing their input, the Bills and their Cultural Resources Consultant shall refine the Phase IA Investigation and issue it as final to the Involved Agencies and Interested Nations listed in Exhibit B.

##### **B. Interested Nations Input and Monitoring of All Archaeological Field Activities**

1. ECSC/ESD will ensure that the Bills and their Cultural Resources Consultant coordinate with representatives of the Interested Nations on all planned archaeological field testing/investigations.
2. At least seven (7) calendar days prior to commencement of any archaeological field testing/investigations the Bills shall notify the Involved Agencies and Interested Nations to advise of such activities.
3. Interested Nations shall be provided the opportunity to participate in monitoring such activities on all planned archaeological field testing/investigations.

##### **C. Completion of Phase IB Archaeological Site Investigations (“Phase IB Investigation”)**

1. Based upon the information contained in the Phase IA Investigation, ESD will ensure that the Bills will contract Cultural Resources Consultant to undertake Phase IB archaeological field testing/investigations where planned construction activities associated the Project will extend into undisturbed native soils.

2. In developing the approach for the Phase IB Investigation, the Bills and their Cultural Resources Consultant shall, in addition to information on past disturbance events derived from as-built documents, and underground utility records, or other similarly reliable sources, shall undertake a series of minimally invasive test excavation or soils borings/cores down to existing bedrock to help confirm/document the depth of fill materials and elevation of undisturbed native soils in "Area 2" as shown in Exhibit A, supplementing soil boring information presented in the July 2022 McMahon & Mann Geotechnical Engineering Assessment Report, also shown in Exhibit A. A report outlining the findings of such supplemental soil borings/cores shall be provided to OPRHP and Interested Nations and include descriptions/graphic depictions of the depths of fill soils and native soils as interpreted by a geoarchaeologist, and a description/graphic depiction of anticipated construction depths versus fill depths to assist in determining where construction activities will impact undisturbed native soils.
3. Prior to Phase IB archaeological field testing/investigations, the Bills and their Cultural Resources Consultant shall develop a work plan and testing methodology, informed by the supplemental soil boring/cores and in consultation with Involved Agencies and Interested Nations, focusing on areas where planned construction activities associated the Project would extend into undisturbed native soils.
4. In planning the Phase 1B investigation the Bills and their Cultural Resources Consultant in consultation with appropriate specialist(s), shall explore the utility and application of remote sensing as part of the archaeological survey for burial and feature identification and determine if any techniques appear to be promising, and discuss which of those techniques may or may not apply, with the Involved Agencies and Interested Nations. Specialists consulted shall be familiar with the applicability of the method being considered to archaeological investigations.
5. Following Phase IB archaeological field testing/investigations, the Bills and their Cultural Resources Consultant shall provide a summary end-of-field memorandum to the Involved Agencies and the Interested Nations listed in Exhibit B, outlining preliminary findings of the investigations. This memorandum shall be augmented by the full Phase IB Report that will be provided to the Involved Agencies and the Interested Nations.

#### **D. Completion of Archaeological Assessment Investigations (Phase II)**

1. For those locations where, based upon the Phase 1B Investigation, are determined to be potentially S/NRHP-eligible and are proposed for disturbance in association with the development of the Project, the Bills and their Cultural Resources Consultant shall conduct appropriate Phase II archaeological assessment investigations to determine S/NRHP eligibility.
2. Prior to Phase II archaeological field activities, a Phase II scope of work/testing methodology will be prepared in consultation with OPRHP and the Interested Nations.
3. Following Phase II field activities and evaluations, the Bills and their Cultural Resources Consultant shall provide a summary end-of-field memorandum to the Involved Agencies and the Interested Nations listed in Exhibit B, outlining preliminary findings of the investigations. This memorandum shall be followed by a full Phase II Report to be provided to the Involved Agencies and the Interested Nations for comment.

4. Phase II field evaluation and testing program(s) will be carried out at a level sufficient to be able to determine if sites/resources meet the criteria for listing in the S/NRHP (9 NYCRR Part 428.5 and 428.6). the Bills and their Cultural Resources Consultant, in consultation with OPRHP and the Interested Nations, will apply S/NRHP criteria and reach one of the following conclusions:
  - a. The site does not meet S/NRHP eligibility criteria; in which no further action is required.
  - b. The site meets one or more S/NRHP eligibility criteria, in which case the site will be treated in accordance with Stipulation I. E. below.
5. ECSC/ESD or the Bills shall notify OPRHP and Interested Nations of conclusions regarding evaluation of eligibility of all locations for inclusion in the S/NRHP.

**E. Consideration of Feasible and Prudent Alternatives**

1. In accordance with 9 NYCRR Part 428.8, in the event of identification of S/NRHP-eligible sites and resources, inclusive of indigenous human remains and burials, ECSC/ESD will ensure that the Bills fully consider any feasible and prudent alternative measures to avoid an identified adverse impact of the Project upon such sites. Such measures may include, but are not limited to:
  - a. Relocation or realignment of a Project component(s) to avoid adversely impacting the site;
  - b. Redesign and/or reconfiguration of the characteristics of a Project component without full relocation or realignment, such as refinements to elevations of its design features so as not to impact a site; and/or
  - c. Measures to mitigate or lessen the severity of the adverse impact upon the resource, which may include but are not limited to Phase III Data Recovery presented in Stipulation I. F. below.
2. For each S/NRHP-eligible site in question, the Bills shall prepare a draft “Alternative Treatment Memorandum”, using feasibility factors associated with the implementation of each alternative treatment, such as the program needs of the Project, availability of alternative component locations, direct/indirect costs, safety, efficiency, code requirements, etc.
3. The Bills shall consult with Involved Agencies and the Interested Nations on the evaluations/considerations in the draft Alternative Treatment Memorandum(s) on the treatment of any encountered S/NRHP-eligible sites and resources. Concurred-upon approaches and measures to be implemented will be outlined in a final Alternative Treatment Memorandum(s) distributed to the Involved Agencies and Interested Nations listed in Exhibit B. If concurrence is not reached, the matter will follow the Dispute Resolution procedure outlined in Stipulation VI.

**F. Phase III Data Recovery**

1. For archaeological sites determined to be eligible for inclusion on the S/NRHP and cannot be reasonably be avoided, ECSC/ESD shall ensure that that the Bills undertake/implement, or cause to have undertaken/implemented, a Phase III data recovery plan that is consistent with the 2004 New York Archaeological Council Standards.
2. Prior to Phase III archaeological field testing/investigations, a Phase III data recovery plan will be

prepared by the Bills and their Cultural Resources Consultant for review by OPRHP and the Interested Nations.

#### **G. Human Remains**

1. Given the potential to encounter burials and human remains as unanticipated discoveries, the Involved Agencies will cooperate with the Interested Nations to develop and execute a Memorandum of Understanding covering the treatment of burials, human remains and funerary objects that might be discovered during the course of any project related activity. Such a Memorandum of Understanding for treatment of these resources and remains would be considered to be included as an amendment to this LOR.
2. In portions of "Area 2" in Exhibit A, where construction would encounter undisturbed native soils, excavation activities will be monitored for such features, informed by the results of the Phase IB and if applicable, Phase II investigations. In addition, where feasible, a 50-foot protective buffer area shall be established during construction around the documented perimeter of cemeteries in the Project Area.
3. In the event that human remains and/or associated funerary objects are discovered during the archaeological field work, pre-construction, or construction activities, all work contracted by the Bills, and/or work conducted on their behalf, in the immediate vicinity of the human remains must cease immediately and ECSC/ESD and all other Involved Agencies and Interested Nations must be notified immediately.
4. The area containing the human remains and/or associated funerary objects must be covered and protected from the elements and other disturbances. In consultation with the Involved Agencies and Interested Nations, a protective area shall be established around the location of the discovery that is off limits to all construction activities. Work in that area may not recommence until clearance is given by the ECSC/ESD in consultation with the Involved Agencies and the Interested Nations
5. Procedure and protocol for notification, treatment, and disposition of the human remains shall comply with OPRHP and the Haudenosaunee Human Remains Protocols attached as Exhibit C.

#### **H. Curation**

1. After the completion of all archeological investigations required pursuant to this LOR, ownership of the collection shall be offered for transfer to the Interested Nations.
2. If none of the Interested Nations desire to take ownership of the collection or any portion thereof, ECSC/ESD shall require the Bills to develop and implement, in consultation with OPRHP, a plan that ensures that such resources are transferred to a facility and curated in a manner that meets the standards set forth in the 1994 New York Archaeological Council Standards.

#### **I. Professional Standards**

ECSC/ESD shall ensure that all archaeology investigations and analyses carried out pursuant to this LOR by the Bills and their Cultural Resources Consultant is conducted by or under the direct supervision of a

person or persons meeting at a minimum the Secretary of the Interior’s Professional Qualification Standard for Archaeology (see: <https://www.nps.gov/articles/sec-standards-prof-quals.htm>).

## **II. MONITORING AND REPORTING**

During each period of six (6) months following the execution of this LOR until expiration or termination hereof, the Bills shall provide Involved Agencies and Interested Nations a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received.

## **III. PHASING OF CONSTRUCTION ACTIVITIES AND FURTHER CONSULTATION**

ECSC/ESD shall ensure that the Bills take all reasonable steps to ensure that any appropriate archaeological field analysis, evaluation, alternative treatments, and if necessary, data recovery or other types of mitigation can proceed in advance of construction activities. In establishing construction scheduling and staging, the Bills will fully consider, anticipate, and prepare for further OPRHP/Interested Nations consultation and archaeological work that must be undertaken. Upon receipt of the reports listed below, OPRHP and Interested Nations will provide reasonably timely reviews, recommendations, and concurrences in accordance with the following timeframes (unless a mutual accepted schedule for response is identified by the signatories and Concurring Parties):

- |  |                         |
|--|-------------------------|
| 1. Archaeological mapping of past site disturbance, work plans/testing methodologies for Phase IB/II Investigations, Alternative Treatment Memoranda, and if necessary, Phase III data recovery plans: | <u>30 calendar days</u> |
| 2. Archaeological end-of-field memoranda or reports:   | <u>14 calendar days</u> |
| 3. Archaeological: full phase IB, II, or III reports:  | <u>30 calendar days</u> |

Further, ECSC/ESD will ensure that the Bills conduct regularly-scheduled meetings with Involved Agencies and Interested Nations to provide notice/information on schedules, plans, and timing related to the coordination of archaeological work with construction so that review requirements can be anticipated and provided in a timely manner.

## **IV. ADDITIONAL STATE OR LOCAL AGENCY SIGNATORIES**

In the event that another New York State or local agency becomes involved with the authorization, funding, and/or undertaking of any portion of the Project, it may (in the State or local agency’s sole discretion) elect to become a signatory of this LOR to fulfill its obligations under the requirements of Section 14.09 of the New York State Historic Preservation Act (“SHPA”), subject to approval by each of the current LOR signatories, in consultation with Concurring Parties.

## **V. COMPLIANCE WITH FEDERAL HISTORIC PRESERVATION REQUIREMENTS**

In the event that a federal agency becomes involved with the authorization, funding, and/or undertaking of any portion of the Project, which would be subject to the requirements of Section 106 of the National Historic Preservation Act (“NHPA”), it may (in the lead federal agency’s sole discretion) utilize the documentation of the 14.09 process, and/or incorporate the agreed-upon stipulations in this LOR into a

federal programmatic agreement or similar instrument to fulfill their federal Section 106 consultation requirements.

**VI. DISPUTE RESOLUTION**

Should any signatory to this LOR dispute or object at any time to the interpretation or application of this LOR, ECSC/ESD shall consult with parties that ECSC/ESD deems appropriate to resolve the dispute or objection. Prior to reaching a final decision on the dispute, ECSC/ESD shall prepare a written response, including findings and/or any other relevant information timely provided by the LOR signatories and Concurring Parties regarding the dispute. ECSC/ESD shall promptly provide each signatory with a copy of this written response. All parties agree to work as expeditiously as necessary/appropriate to reach consensus on a dispute, given schedule considerations, but in no instance longer than sixty (60) days. ECSC/ESD will then proceed according to its final decision.

**VII. AMENDMENTS**

No amendment to this LOR shall be effective unless made in writing duly executed by all LOR signatories, in consultation with Concurring Parties. Following such consultation, Concurring Parties may elect to concur or decline to concur in a proposed amendment to this LOR, to this LOR, by promptly providing written notice of the same to all LOR signatories.

**VIII. TERM/DURATION**

The stipulations in this LOR shall take effect on the date it is executed by the last LOR signatory agency (i.e., ECSC/ESD, OPRHP, NYSDEC and the County) and will remain in effect until ECSC/ESD closes its grant under which a portion of the Project will be financed. Prior to expiration, if necessary, ECSC/ESD may consult with the signatories to reconsider the terms/duration of the LOR and propose amendments in accordance with Stipulation VII. The duration of this LOR may be extended only upon the written approval of all LOR signatories, in consultation with Concurring Parties.

**IX. TERMINATION**

If any signatory to the LOR determines that its terms will not or cannot be carried out, that signatory shall immediately confer with the others to attempt to resolve a dispute under Stipulation VI or develop an amendment per Stipulation VII above. If within thirty (30) days a dispute cannot be resolved or an agreement on an amendment cannot be reached, any signatory may terminate the LOR upon written notification to the other signatories.



**X. SEVERABILITY**

If any section, subsection, paragraph, sentence, clause, or phrase in this LOR is, for any reason, held to be unconstitutional, invalid, or ineffective, such decision shall not affect the validity or effectiveness of the remaining portions of this LOR.

**XI. COUNTERPARTS**

This LOR may be executed in counterparts, with a separate page for each LOR signatory agency and invited Concurring Party. ECSC/ESD will ensure that each signatory is provided with a fully executed copy of the final LOR.

**EXECUTION AND IMPLEMENTATION OF THIS LETTER OF RESOLUTION SERVES AS EVIDENCE THAT ECSC/ESD HAS SATISFIED ITS SECTION 14.09 RESPONSIBILITIES FOR THE UNDERTAKING.**

**SIGNATURE PAGES FOLLOW**

**LETTER OF RESOLUTION**

**AMONG THE ERIE COUNTY STADIUM CORPORATION, A SUBSIDIARY OF THE NEW YORK STATE URBAN DEVELOPMENT CORPORATION D/B/A EMPIRE STATE DEVELOPMENT; THE STATE HISTORIC PRESERVATION OFFICE OF THE NEW YORK STATE OFFICE OF PARKS, RECREATION, AND HISTORIC PRESERVATION; THE NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION; AND THE COUNTY OF ERIE**

**REGARDING**

**NEW BUFFALO BILLS STADIUM COMPLEX  
ORCHARD PARK, ERIE COUNTY, NEW YORK**

Erie County Stadium Corporation, subsidiary of the New York State Urban Development Corporation  
d/b/a Empire State Development

By: \_\_\_\_\_ Date: \_\_\_\_\_  
Soo Kang, Vice President  
Agency Preservation Officer, Empire State Development

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**REGARDING**

**NEW BUFFALO BILLS STADIUM COMPLEX  
ORCHARD PARK, ERIE COUNTY, NEW YORK**

State Historic Preservation Office  
New York State Office of Parks, Recreation, and Historic Preservation

By: \_\_\_\_\_ Date: \_\_\_\_\_  
R. Daniel Mackay  
Deputy Commissioner, State Historic Preservation Officer

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**REGARDING**

**NEW BUFFALO BILLS STADIUM COMPLEX  
ORCHARD PARK, ERIE COUNTY, NEW YORK**

New York State Department of Environmental Conservation

By: \_\_\_\_\_

Charles Vandrei  
Agency Historic Preservation Officer

Date: \_\_\_\_\_

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**REGARDING**

**NEW BUFFALO BILLS STADIUM COMPLEX  
ORCHARD PARK, ERIE COUNTY, NEW YORK**

County of Erie

By: \_\_\_\_\_  
Daniel Castle  
Commissioner of Environment and Planning

Date: \_\_\_\_\_

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**REGARDING**

**NEW BUFFALO BILLS STADIUM COMPLEX  
ORCHARD PARK, ERIE COUNTY, NEW YORK**

**Invited to Concur:**

The Buffalo Bills

By: \_\_\_\_\_

Date: \_\_\_\_\_

NAME:

TITLE:

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**REGARDING**

**NEW BUFFALO BILLS STADIUM COMPLEX  
ORCHARD PARK, ERIE COUNTY, NEW YORK**

**Invited to Concur:**

Seneca Nation

By: \_\_\_\_\_  
Dr. Joseph Stahlman  
Tribal Historic Preservation Officer

Date: \_\_\_\_\_

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**REGARDING**

**NEW BUFFALO BILLS STADIUM COMPLEX  
ORCHARD PARK, ERIE COUNTY, NEW YORK**

**Invited to Concur:**

Tonawanda Seneca Nation

By: \_\_\_\_\_  
Chief Roger Hill

Date: \_\_\_\_\_



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**AMONG THE ERIE COUNTY STADIUM CORPORATION, A SUBSIDIARY OF THE NEW YORK STATE URBAN DEVELOPMENT CORPORATION D/B/A EMPIRE STATE DEVELOPMENT; THE STATE HISTORIC PRESERVATION OFFICE OF THE NEW YORK STATE OFFICE OF PARKS, RECREATION, AND HISTORIC PRESERVATION; THE NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION; AND THE COUNTY OF ERIE**

**REGARDING**

**NEW BUFFALO BILLS STADIUM COMPLEX  
ORCHARD PARK, ERIE COUNTY, NEW YORK**

**Invited to Concur:**

Tuscarora Nation

By: \_\_\_\_\_

Rene Rickard  
Director Tuscarora Environment Office

Date: \_\_\_\_\_