

## H. Cultural Resources

### 1. Additional Technical Studies

No additional technical studies related to cultural resources were necessary for the FEIS.

### 2. Plan Changes and Impact Summary

The modified FEIS plan would not impact Cultural Resources any further than the original conceptual plan presented in the DEIS. However, the Applicant recognizes that the demolition of historically significant buildings is an unavoidable adverse impact. Most of the comments request further information or clarification on what was presented in the DEIS. The major items are summarized below.

While the buildings proposed to be preserved and adaptively reused are listed on Table II-4 of the DEIS, the Applicant has also provided renderings of two of the restored buildings (see Exhibits II.PA-4 through II.PA-6).

The “Gone” category in Table III.H-1 of the DEIS refers to buildings no longer in existence. Of the eight structures, six had been removed before the Applicant purchased the site. The two buildings removed after the purchase of the site included the Dam/Gatehouse, which was burned down by vandals, and the Director’s Garage, which was removed during the renovation of the Manor House.

The structures in close proximity to the Project Site that are identified in the DEIS Cultural Resources chapter have been considerably altered. As a result of the alteration of the structures, combined with the presence of many buildings constructed post-1947 the proposed development would not result in adverse impacts to off-site cultural resources.

### 3. Comments and Responses

#### *Comment H.1*

I read in the DEIS that historic buildings would be rehabilitated. I am glad to see this. However, I did not see which buildings would be adaptively reused.

(Donna Hearn, Town Historian, Public Hearing Transcript, 6/3/09, Pg. 65)

#### *Response H.1*

***Table II-4 on page II-10 and Table III.H-1 on page III.H-10 of the DEIS list the buildings that would be preserved and adaptively reused.***

#### *Comment H.2*

There are two cemeteries on the Project Site. I spoke with Tom O’Clair, Family Affairs Specialist at the Office of Recipient Affairs at OMH. OMH controls the cemeteries on the Project Site. I was happy to learn that they had met with Dover Knolls in April, and that Dover Knolls is working with them to see that there are volunteers that will be coming in to help clean up and remediate some of the messes in the cemetery. They will begin clearing the road to the Gates of Heaven Cemetery. The lower cemetery will receive work next year.

(Donna Hearn, Town Historian, Public Hearing Transcript, 6/3/09, Pg. 66; Donna Hearn, Town Historian, Letter, 6/3/09, Pg. 1)

*Response H.2*

***Although the Applicant owns and controls the on-site cemeteries, OMH is currently working on implementing a restoration plan with the Applicant for the cemeteries.***

*Comment H.3*

Any old stone walls or historic structures should be identified, documented and retained or reused.

As historian, I know that there are stonewalls on the eastern hillsides. I did not see any plans for the walls, and the Scoping Document says that the stone walls should be noted. I believe there are at least two stonewalls on the eastern hillsides. If these stone walls are removed, could the materials be used to build walls around the cemetery that fronts on Hoags Corner Road to separate it from the surrounding landscape? This would protect the cemetery.

(Donna Hearn, Town Historian, Public Hearing Transcript, 6/3/09, Pg. 66-67; Donna Hearn, Town Historian, Letter, 6/3/09, Pg. 1)

*Response H.3*

***The stone walls on-site have been documented in the Cultural Resources chapter of the DEIS. Any stone walls disturbed on the east side of the site will be reused on-site.***

*Comment H.4*

The historic subdivision of the hospital resulted in the existence of a few paper roads. Could a statement be prepared that the roads would no longer be viable and that this Project would eliminate the need for the paper roads to ever be constructed? Paper roads are present elsewhere in Town from subdivisions that have presented problems.

(Donna Hearn, Town Historian, Public Hearing Transcript, 6/3/09, Pg. 67; Donna Hearn, Town Historian, Letter, 6/3/09, Pg. 1)

*Response H.4*

***No previously proposed or approved roads would be permitted beyond what is proposed by the Applicant. In relation to Askins Road, this road would terminate at the access to the Gates of Heaven Cemetery. The original full length of Askins Road shown on many of the graphics in the DEIS was carried over from mapping information from various sources. The Applicant has never intended to reconnect this road to Duell Hollow Road, therefore the new plan has removed that connection.***

*Comment H.5*

The discussions of the historic buildings were not provided; only the SHPO document is shown. Where are the discussions?

(Donna Hearn, Town Historian, Letter, 6/3/09, Pg. 1)

*Response H.5*

**Chapter III.H in the DEIS, Cultural Resources, describes the historic nature of the site as well as a complete discussion of buildings on-site.**

*Comment H.6*

The Dover Knolls plan speaks of preserving/restoring some buildings, but those named are either small houses or of fairly recent construction. The many large older brick administration and patient ward buildings along Route 22 and Hutchinson Avenue will need to be demolished and the hazardous materials removed.

(Margery Josephson, President, Naromi Land Trust, Letter, 6/29/09, Pg. 2)

*Response H.6*

**This statement is incorrect. While many of the existing buildings on-site will require remediation and demolition, 13 buildings are proposed to be remediated and restored, including the Administration Building, two I-Buildings, U-Building, Storehouse and Power Plant along Route 22 (six of the eight buildings that are located on Route 22), as well as other buildings such as Smith Hall and a colonial home that was built before the hospital existed.**

*Comment H.7*

An exhibit that identifies the limits of the existing onsite cemeteries should be provided.

(Town of Dover Planning Board, Letter, 7/20/09, Pg. 8)

*Response H.7*

**The known boundaries of the east and west Gate of Heaven cemeteries are shown on Exhibit III.M-1 of the DEIS. The west Gate of Heaven cemetery is displayed on the Site Plan Drawings included with the DEIS submission (Drawings SP-0.1, SP-0.2, SP-1.3 and SP-4.3). The Applicant is working with the NYS Office of Mental Health on a restoration plan for both cemeteries, which includes boundary confirmation.**

*Comment H.8*

The DEIS Cultural Resources chapter describes several structures on adjacent properties, but provides information that appears to lead to the conclusion that the structures are either: 1) considerably altered, and therefore should not be considered as potential historic resources for the purposes of the analysis; or 2) outside of the project's area of potential effect for historic resources. If the buildings are not considered to be potential historic resources because of their alterations, this conclusion should be noted in the chapter and the chapter should explain that these structures are thus not included in the evaluation of the project's potential impacts on historic resources (and the discussion in the "Potential Impacts" section should be updated to reflect this change).

(Graham Trelstad, AKRF, Memorandum to Town Board, 7/30/09, Pg. 8)

*Response H.8*

***The conclusion alluded to in this comment is correct. While two buildings have been identified that have some historic significance (one building might be the “White School”, located on the east side of Hoags Corner Road, north of Wheeler Road; the farmhouse that is part of the Hoag House and Barn House, located at the intersection of Hoags Corner Road and County Route 21), these buildings have been altered significantly and are surrounded by dwellings that post-date 1947. Given that the identified historic structures have been altered and the abundance of surrounding buildings that post-date 1947, the proposed development would not result in adverse impacts to off-site cultural resources.***

*Comment H.9*

In Table III.H-1, the DEIS should clarify what is meant by the “G-Gone” category. Is this meant to denote those structures that were previously identified as State/National Register-eligible, but that have since been removed from the campus?

(Graham Trelstad, AKRF, Memorandum to Town Board, 7/30/09, Pg. 8)

*Response H.9*

***Eight structures were identified in the DEIS as “G-Gone”. This category refers to buildings that are no longer in existence. Of the eight structures, six had been removed before the Applicant purchased the Project Site. Of the two buildings that were removed after the purchase of the Project Site by the Applicant, one was lost to fire and the other was demolished due to its deteriorated condition. The Dam/Gatehouse was burnt down by vandals, while the Director’s Garage was removed during the renovation of the Manor House.***

*Comment H.10*

The description of potential mitigation measures for historic resources should be consistent between the Mitigation and Cultural Resources chapters.

(Graham Trelstad, AKRF, Memorandum to Town Board, 7/30/09, Pg. 8)

*Response H.10*

***Comment noted.***

*Comment H.11*

The summary of construction impacts in the Executive Summary does not refer to the demolition of historic resources, which is a significant adverse impact of the project that occurs during the construction period.

(Graham Trelstad, AKRF, Memorandum to Town Board, 7/30/09, Pg. 8)

*Response H.11*

***Comment noted. The proposed Master Development Plan minimizes potential adverse impacts to historic resources to the maximum extent practicable, consistent with social, economic and other legitimate municipal goals, as SEQRA requires. The Executive Summary is clarified to indicate that impacts to certain resources on the site are unavoidable.***