

### **III.K Historic and Archeological Resources**

## **K. Historic and Archeological Resources**

### **Comment III.K-1:**

87 Nepperhan Avenue: This is a beautiful Art Deco building adjacent to City Hall that will be replaced with a parking garage that will probably be as tall as City Hall and will block light and air from the east-facing office windows. This building should probably receive landmarked status as our premiere Art Deco building in the city and should be refurbished on the interior, which is in basically sound condition. Leaving it in place would: Eliminate the environmentally unsound practice of demolishing and disposing of still viable structures which violates good sense and smart development practices. · Reduce the need for such a tall structure on the Cacace parkland which could house a smaller hotel and conference center instead of replacement office space for 87 Nepperhan.

*(Aileen Kilcommon, Yonkers Rowing and Paddling Club, Letter, 5/19/2008)*

### **Response III.K-1:**

The Applicant has prepared a structural assessment of what it would take to rehabilitate and incorporate the 87 Nepperhan building into the proposed garage structure and found that alternative to be financially infeasible. The Applicant has consulted with the NYS Office of Parks, Recreation, and Historic Preservation regarding the documentation process required prior to the demolition of the 87 Nepperhan structure. In addition, the distinctive building elements of the structure, including the decorative limestone ornamentation, will, to the extent practicable, be incorporated into the design of the River Park Center. As indicated above, the Applicant has made a commitment to incorporate those distinctive elements of the building façade. The distinctive elements may be used as part of one of the proposed buildings or may be incorporated into the landscape of the proposed plaza area along the daylighted portion of the Saw Mill River at River Park Center. The specific details will be prepared as part of the site plan approval process before the City's Planning Board. See page III.K-7 of the DEIS.

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### **Comment III.K-2:**

Historic preservation alternative. There is no examination of an alternative that only saved the 87 Nepperhan building, while permitting the demolition of the Salvation Army building and the current parking garage. I believe that was the intention of that request for an adaptive reuse examination, but we got all or nothing. The building that is eligible for the National Register is 87 Nepperhan. Has the possible adaptive reuse of 87 Nepperhan as headquarters for the proposed technical campus at SUNY been explored? If not, why not? How much will the demolition of 87 Nepperhan cost? Who will pay for the demolition? How much is it going to cost to move all the city services from 87 Nepperhan to the new office building?

*(Deirdre Hoare, Resident, Public Hearing, 5/13/2008, Page 199-200)*

### **Response III.K-2:**

As indicated in the DEIS, if the 87 Nepperhan building is retained and adaptively reused as office space, City staff would not need to be relocated. However, as indicated in Chapter V of the DEIS and DEIS Exhibit V-16, it would not be financially feasible to keep the building and design the parking garage around it. Demolition costs of 87 Nepperhan will be the responsibility

of the Applicant. The cost to move the City offices into their new facility would be the responsibility of the Applicant in coordination with the City of Yonkers. Also see Response V-9.

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**Comment III.K-3:**

Furthermore, what mitigation is proposed for the demolition of the School Street Bridge, which to my surprise apparently is National Register eligible also. No, there is no discussion of mitigation for that.

*(Deirdre Hoare, Resident, Public Hearing, 5/13/2008, Page 201)*

**Response III.K-3:**

The mitigation required by the NYSOPRHP for culturally significant structures to be demolished includes specific documentation procedures. To the extent practicable, any defining elements of the New School Street Bridge that can be incorporated into the River Park Center project will be included.

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**Comment III.K-4:**

Only a very limited Phase I cultural analysis was done in this particular- - in the EIS for this project. I would very much like to see a Phase 1-B scope done. First of all, 1-A has to be completed sufficiently for this current EIS. It's totally insufficient, and secondly, you then go to the borings, you do the site investigations and so on.

*(Nortrud Spero, Resident, Public Hearing, 5/13/2008, Page 222-224)*

**Response III.K-4:**

The Applicant's cultural resource consultant has been conferring with NYSOPRHP on documentation and processing of the Project.

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**Comment III.K-5:**

I have reviewed the DEIS as submitted. I would point out that the Victor Street photos are actually 3 buildings located at the top of Riverview Place.

*(Linda Nitsch, On behalf of Richard Narog, City of Yonkers, E-mail, 5/27/2008)*

**Response III.K-5:**

Comment noted. As noted in the Structural Assessment Report included in Appendix 3A of the DEIS, the three buildings on Victor Street are not eligible for the National Register of Historic Places. They were surveyed because they are in the 500 foot buffer study area.

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**Comment III.K-6:**

Historical dam foundations are ignored in the proposal, this area had a profound influence on industrial Yonkers after the Phillipse Manor subdivision & might have a place in the green initiative inspired by the council to provide a learning environment for the schools, & maybe a small hydro project to power an area along the downtown.

*(Joseph Kozlowski, Board Member, Friends of the Old Croton Aqueduct, E-mail, 5/30/2008)*

**Response III.K-6:**

Comment noted. The documentation provided as part of the DEIS indicates the historical presence of dams and water powered industry. These types of archeological features will be addressed in the Phase IB work scope.

**Comment III.K-7:**

I would like to see historic markers indicating the places where the various Indians lived prior to European settlement.

*(Patricia McDow, City Council Member, City of Yonkers, Letter, 5/30/2008)*

**Response III.K-7:**

Comment noted. The Applicant has indicated that it would coordinate with the City Recreation Department on the programming of the publicly accessible open space.

**Comment III.K-8:**

I would like to see a historic walk as proposed by Barbara Seigel in order to share the history of the downtown.

*(Patricia McDow, City Council Member, City of Yonkers, Letter, 5/30/2008)*

**Response III.K-8:**

The Applicant has met with Ms. Siegel. In addition, Ms. Siegel is working with the Applicant's public art consultant, JMC Partners. The Applicant is willing to work with the City's Recreation Department in the programming of the publicly accessible open space. See also Response III.K-7.

**Comment III.K-9:**

Did the developer explore the possibility of a Marina Museum as a way to mitigate the impacts to historic and archeological resources?

*(Patricia McDow, City Council Member, City of Yonkers, Letter, 5/30/2008)*

**Response III.K-9:**

A marina museum was not included as a mitigation measure. However, as a result of any archeological material being recovered, the Applicant would make that material available to the City for their use. As indicated previously, the Applicant will, to the extent practicable,

incorporate distinctive architectural elements into the River Park Center project from the 87 Nepperhan building.

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**Comment III.K-10:**

Based on our review, the SHPO recommends that the applicant begin consultation with the Army Corps of Engineers so a Programmatic Agreement (PA) can be developed to address the Section 106 review process.

*(Cynthia Blakemore, State Historic Preservation Office (SHPO), NYSHPO, Letter, Not Dated)*

**Response III.K-10:**

Comment noted. The Applicant's engineering and cultural resource consultants will initiate the Section 106 review process with the Army Corps of Engineers.

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**Comment III.K-11:**

Additionally, the SHPO recommends that a Phase IB Scope of Work be prepared for each development phase of the Area of Potential Effect (APE). The individual scope should include the following: Delineation of the individual development phase APE. A geo-referenced overlay of the historic maps so the selected testing locations can be identified and discussed. Boring records with archeological interpretation. Geomorphologic assessment for alluvial soils/river deposits as it pertains to the potential for buried deposits. The SHPO recommends addressing each development phase separately in order to provide sufficient resources for the identification of historic properties in each phase. We will provide comments on the Scope of Work for each development phase as they occur.

*(Cynthia Blakemore, State Historic Preservation Office (SHPO), NYSHPO, Letter, Not Dated)*

**Response III.K-11:**

Comment noted. The Applicant's cultural resource consultant has initiated the Phase 1B process relative to the mapping required. However, it is noted that this process, specifically for the River Park Center site must be coordinated with NYSDEC and DOH relative to the Brownfields Cleanup Program.

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**Comment III.K-12:**

Table III.K-2 Properties Listed or Eligible on State and National Registers states, "11940.001086 Getty Square: New Main St. and Palisades Avenue. Clarify the properties referenced at this location.

*(Debra S. Cohen, Esq., Attorney, C.H. Martin, Letter, 5/30/2008)*

**Response III.K-12:**

11940.0011086 is the structure formerly occupied by the W.T. Grant Store and located at the intersection of New Main Street and Palisades Avenue in Gerry Square. The Project site is within an existing urban environment where adjacent and nearby properties will remain during the

construction and after the completion of the Project. C.H. Martin and the Mount Carmel Baptist Church are located on the River Park Center site. The Cacace Justice Center is located on the Cacace Center site. Construction precautions will be followed to ensure the continued operations of properties eligible for the National Register and others.

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**Comment III.K-13:**

(39) V., p.15 The DEIS states, "The 2003 Findings Statement indicates there are no historic structures that would be affected by this alternative". Clarify that the Applicant's historic and archaeological resource assessments contradicts the 2003 Findings Statement.

*(Debra S. Cohen, Esq., Attorney, C.H. Martin, Letter, 5/30/2008)*

**Response III.K-13:**

The Applicant's cultural resource consultant's assessment identifies 127-129 New Main Street as being a National Register Eligible structure. This structure, along with the structure mentioned in the previous comment, are the only such structures located within the outline of the previous environmental review for a proposed ballpark (refer to DEIS Exhibit V-2).

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**Comment III.K-14:**

1) When will a Phase 1B archaeological survey be done at each of the four project sites? 2) Why haven't Phase 1A and Phase 1B archaeological surveys already been done for each project site? 3) Given the historic and archaeological sensitivity of the majority of project sites, what will happen if historic artifacts and/or remains are located during the surveys or ground disturbance incident to construction? 4) Will historic resources consultants be retained on site during the construction phase to monitor excavations?

*(Deirdre Hoare, Resident, Letter, 5/30/2008)*

**Response III.K-14:**

Phase 1A cultural resource surveys have been prepared for the Proposed Action. The coordination of the Phase 1B surveys is currently on-going with the NYSOPRHP, this also includes coordinating with NYS DEC and DOH relative to the Brownfields Clean-up Program. In the event archeological remains are recovered they will be documented and provided to either the state or City for disposition. Cultural resource consultants will be available prior to the construction process to conduct the Phase 1B process.

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**Comment III.K-15:**

5) When will the State Historic Preservation Office be consulted regarding the proposed Brownfield Remediation plan for Chicken Island? Wholesale ground disturbance without oversight could potentially destroy important historic artifacts now buried beneath contaminated soil.

*(Deirdre Hoare, Resident, Letter, 5/30/2008)*

**Response III.K-15:**

The Applicant's cultural resource consultant has been coordinating with NYSOPRHP regarding the input necessary from NYSDEC and DOH relative to Brownfields Clean-up Program. This will also be addressed in the Phase 1B scope.

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**Comment III.K-16:**

6) Why wasn't an alternative explored that retained or adaptively re-used 87 Nepperhan while allowing the demolition of the Salvation Army building and current government parking garage so that an expanded parking garage could still be built?

*(Deirdre Hoare, Resident, Letter, 5/30/2008)*

**Response III.K-16:**

The scoping outline identified as an alternative the adaptive reuse of 87 Nepperhan including retaining the façade and incorporating that into the design of a new building on-site. Exhibit V-16 in the DEIS leaves the 87 Nepperhan building intact and provides an extension of the existing garage. Based on initial evaluations regarding the cost to incorporate the 87 Nepperhan building within a garage structure, is, in the Applicant's opinion, cost prohibitive given the effort to stabilize the building and the design efforts to accommodate structured parking.

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**Comment III.K-17:**

7) Why weren't any graphics or photo simulations provided of the visual impact of the projects on the various historic resources that were identified in the cultural resources survey? For example, we need visuals of the mall and 50 story towers at Chicken Island and how they relate to the historic City Hall, Getty Square, Main Street, Philipse Manor and other historic districts and buildings in the downtown.

*(Deirdre Hoare, Resident, Letter, 5/30/2008)*

**Response III.K-17:**

As identified in the adopted scoping outline, Section III-B of the DEIS depicts the visual impacts associated with the Proposed Action on selected locations throughout the City. Further, the visual analysis included an extensive shadow study for selected times throughout the year and their potential impact to cultural resources. In addition, the Applicant's cultural resource consultant has identified the structures that would be visually impacted as a result of the Proposed Action (refer to DEIS Appendix 3.A).

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**Comment III.K-18:**

87 Nepperhan Avenue – Adaptive Reuse: No serious adaptive reuse alternative is presented for a building that merits inclusion in the National Register of Historic Places.

*(Board of Directors, Yonkers Committee for Smart Development, Letter, 5/30/2008)*

**Response III.K-18:**

See Response V-9.

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**Comment III.K-19:**

Historic and Archeological Resources, III. K-I, "Larkin Square" should be changed to "Plaza" in the text, table K-I and table K-2.

*(Mario Caruso, Planning Bureau of Yonkers, City of Yonkers, Memo, 5/2/2008)*

**Response III.K-19:**

Comment noted.

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**Comment III.K-20:**

Historic and Archeological Resources, III. Table K-2 According to the Planning Bureau database, several buildings were mistakenly placed on this table and many others were missed and should be added. Below is the list of properties within or in close proximity to the project areas.

Address	Determination	Proximity
Bell Place/Locust Hill Avenue Historic District includes 8 prop.: 1,7,12,17 Bell Place 39,45,53,57 Locust Hill Avenue	National Register	Adjacent to River Park Center
48 Yonkers Avenue (Bathhouse #3) Former Otis Elevator includes: 9 Bashford Street 45 Woodworth Avenue 28,29,38 Wells Avenue	National Register  National Register Eligible	Near River Park Center  Adjacent to Larkin Plaza
Buena Vista Avenue-change to: 49-51,104,114,155,164,192, 195,196,197,205,212,213	National Register Eligible	Adjacent to Larkin Plaza
Yonkers Railroad Station Nepperhan "Ave" should be "Street" 103 Elm Street should be eliminated		
Hudson Street-change to 30,40	National Register Eligible	Adjacent to Larkin Plaza
Main Street-Change to: 3,55	National Register Eligible	Adjacent to Larkin Plaza
11 Saint Casimir Avenue Eliminate, already listed as Mott Mill and on the National Register		
South Broadway-change to: 10,30-38,40,53,87,104,124,130,140	National Register Eligible	Adjacent to River Park Center and Cacace Center
Dock Street-change to:43	National Register Eligible	Adjacent to Larkin Plaza
Add other Streets: Nepperhan Avenue 87 (Health Center Building) 177 (Mt. Carmel Church)	National Register Eligible	Within and Adjacent to River Pk Ctr.
North Broadway 5,10,11,15,19,23,34,52,62,66, 67,72,101	National Register Eligible	Adjacent or Near River Park Center
Manor House Square 2,5,11	National Register Eligible	Adjacent to Larkin Plaza
Warburton Avenue 4-8,46,62,64,74-76	National Register Eligible	Adjacent or Near Larkin Plaza

*(Mario Caruso, Planning Bureau of Yonkers, City of Yonkers, Memo, 5/2/2008)*

**Response III.K-20:**

Comment noted.

**Comment III.K-21:**

Historic and Archeological Resources, III. K-7: Interior and exterior photo documentation should be conducted of 87 Nepperhan Avenue and the 5-7 New School Street according to State Historic Preservation Office standards prior to demolition.

*(Mario Caruso, Planning Bureau of Yonkers, City of Yonkers, Memo, 5/2/2008)*

**Response III.K-21:**

Comment noted. The Applicant's cultural resource consultant will prepare the necessary documentation prior to demolition.

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**Comment III.K-22:**

Historic and Archeological Resources, III. K-7: In the mitigation measure to retain and incorporate distinctive building elements, there needs to be clarification on the phrase "to the extent practicable". This mitigation measure may be a requirement of SHPO. If these building elements are eventually not incorporated into the design of any new buildings, the applicant may consider donating them to the Yonkers Historical Society, the Yonkers Fire Department or another local entity.

*(Mario Caruso, Planning Bureau of Yonkers, City of Yonkers, Memo, 5/2/2008)*

**Response III.K-22:**

The Applicant remains committed to incorporating distinctive architectural elements into the River Park Center design. However, in the event portions cannot be used, or at the City's request, elements can be provided to the City for their use.