

A. PROJECT DESCRIPTION

INTRODUCTION AND BACKGROUND

This document is an Environmental Impact Statement (EIS) for the proposed demolition of the Main Building and Ellis Hall at St. Paul's School to provide additional open space. To ensure comprehensive environmental review in accordance with the State Environmental Quality Review Act (SEQRA) and its implementing regulations at 6 NYCRR Part 617, the potential environmental impacts associated with implementation of the Proposed Action are evaluated in the EIS.

On April 9, 2009, the Village Board of Trustees (the "Village Board") of the Incorporated Village of Garden City (the "Village"), as lead agency, issued a Positive Declaration, or intent to prepare a Draft EIS (DEIS). The Proposed Action was determined to be a Type 1 action, as it involves the demolition of a structure listed on the State and National Register of Historic Places. There are no other involved agencies.

On May 7, 2009, the Village Board adopted a Draft DEIS Scope, and held a public scoping meeting on June 5, 2009. All relevant comments received during the comment period were incorporated into the Final DEIS Scope, which was adopted by the Village Board in August 2009.

The St. Paul's School Demolition for Additional Open Space DEIS was distributed for public review by the lead agency, the Village Board of the Incorporated Village of Garden City, on June 17, 2010. Public comments on the DEIS were made at two public hearing sessions held on the following dates: August 19, 2010 and September 30, 2010. Written and email comments on the DEIS were also received.

PROJECT SITE HISTORY

In 1881, Mrs. Cornelia Stewart, widow of Alexander T. Stewart, founder of the Village of Garden City, entrusted the 48.6-acre St. Paul's campus to the Cathedral of the Incarnation for use as an educational facility. Construction of the Main Building began in 1879, and was completed in 1887. The Main Building operated as a school for over 100 years, during which time several additional buildings, including Ellis Hall, a field house and gymnasium were added. In 1991, the school closed and remained vacant until 1993, when the entire property was acquired by the Village. According to the Village Board resolution approving acquisition of the property, the acquisition was for Village purposes, including recreational purposes. The Village's petition in the eminent domain proceeding to acquire the property stated that the public benefit to be gained by the acquisition of a 48.6-acre site was a significant green space and the prevention of an undesirable use of the property. The Main Building was listed on the National Register of Historic Places in 1978 and is considered part of the late 19th century A. T. Stewart

St. Paul's School Demolition for Additional Open Space

Era Buildings district. Since acquisition by the Village, the majority of the property has been used for a variety of Village purposes, including field and indoor recreation, special events, exhibits, and other general recreational and cultural community uses. In 2004, the Village Board of Trustees also adopted a resolution designating the entire former St. Paul's School campus as dedicated parkland, which cannot be converted to non-park uses without State legislation.

Since the time of acquisition, the Village has investigated a wide range of adaptive reuse programs for the Main Building with the objective of preserving its value as an historic and aesthetic resource. To date, attempts to reuse the building for municipal purposes, educational, age-restricted housing, and market rate housing have not been successful. No proposed adaptive reuse of the Main Building has garnered the level of Village resident support required by State Senator Hannon before he would introduce the home rule legislation necessary to alienate the Property due to the Property's designation as parkland.

PURPOSE AND NEED

Given the Village's inability to facilitate the preservation of the building through adaptive reuse over the last 17 years, the purposes of the Proposed Action are to relieve the Village of a considerable financial cost and potential liability, while creating additional open space. Because of the restrictions on use of the property to park uses and the prohibitive cost of renovating the Main Building for municipal use, the Village has proposed demolition consistent with the purposes of initial acquisition of the property and consistent with its designation as parkland, i.e., public recreational space. Demolishing the Main Building and Ellis Hall would therefore allow this property to become part of the recreational amenity provided by the remainder of the former campus and would fulfill the public use objectives for which the property was originally acquired and subsequently designated as parkland.

The Village expended an average of \$74,000.00 per year to keep the Main Building minimally heated. The heat and water have been turned off since 2009 as a cost-saving measure. It has expended considerable funds in "bandaid" roof repairs and other maintenance functions as well as maintaining building security. As discussed below, the Main Building is in a deteriorated condition and will continue to deteriorate with water infiltration if the roof and windows are not replaced, and the masonry repaired. This work alone, apart from any upgrades needed to comply with building code requirements and allow occupancy of the building, would cost the Village approximately \$13.9 million. Thereafter, operating costs would continue at least at approximately \$121,000 per year, based on the average annual operating costs to maintain the Main Building expended by the Village since its acquisition of the Property. Since the acquisition of the Property in 1993, approximately \$2.3 million has been spent by the Village on maintenance and security. In some years the costs have approached approximately \$165,000 and have been as low as \$37,000 in the most recent years when no heat was provided and little maintenance was undertaken. It should be noted that historical maintenance expenses were predominantly for repair and heating. In more recent years, the annual expenses were significantly lower once heating the building ceased. In contrast, after stabilization, ongoing maintenance expenses would likely be higher.

PROPOSED ACTION

The Proposed Action is the demolition of the Main Building and Ellis Hall at the vacant St. Paul's School, with the addition of Village open space into what are currently the building footprints. The former main entrance driveway and parking would remain as parking.

The demolition is expected to occur in five phases. In phase one, historic elements of the buildings will be removed and preserved as mitigation. In phases two and three (order to be determined), all asbestos containing materials, lead paint, petroleum products, and other hazardous materials will be dealt with appropriately, in accordance with all Federal, State, and County regulations and guidelines. Also in phases two and three, all non-structural recyclable materials will be removed and transported to recycling facilities. In phase four, the building structures themselves will be demolished. Additional recyclable materials will be salvaged as warranted, and the remaining debris will be removed to licensed and permitted recycling and disposal facilities with adequate capacity to accept the material. Finally, in phase five, the site will be appropriately graded and landscaped for its intended use as public open space.

In order to determine the actual cost of the proposed action, the Village conducted a formal competitive bidding process and made public a request for proposals. The bids received for the environmental abatement and demolition of the Main Building and Ellis Hall ranged from \$3,105,500 to \$5,346,000. Approximately an additional 12 percent of the bid price would be required to be expended for health and safety oversight and legally mandated third party air monitoring. Thus, assuming the low bidder was chosen and excluding mitigation expenses, the demolition and abatement could be undertaken for approximately \$3.5 million.¹ This actual number for the abatement and demolition is lower than previously estimated \$5.8 million.

REQUIRED PERMITS AND APPROVALS

As a Village-owned property, in the absence of acquisition by another government entity, there are no other agencies, other than the Village Board, with the authority to fund, undertake, or approve the proposed project. As such, there are no discretionary permits or approvals required by other agencies, and therefore no involved agencies associated with this Proposed Action.

B. POTENTIAL IMPACTS WITH THE PROPOSED PROJECT

LAND USE AND ZONING

The proposed demolition of the Main Building and Ellis Hall at the vacant St. Paul's School, which is owned by the Village, would provide additional open space at the project site for the Garden City community. The area of the building footprints would be used by the Village as open space. Following the proposed demolition, the site would be appropriately graded, restored, and landscaped for its intended use as open space. The proposed reuse would be beneficial to Garden City residents. Demolishing the Main Building and Ellis Hall would allow this property to contribute to the recreational amenity comprised by the remainder of the former campus. Other recreational uses also exist adjacent to the site, including ball fields on the south side of Stewart Avenue, and a private golf course on the east side of Rockaway Avenue. Therefore, the proposed reuse of the site as open space would be compatible with existing uses on the project site and in the surrounding area. The proposed open space would also serve the existing residents in the study area. The Proposed Action would be consistent with public policy as embodied in the 2004 Village Board park dedication of the site. Therefore, the Proposed Action is not expected to result in significant adverse land use impacts.

¹ There would be additional costs for the required archaeological assessment and any mitigation.

St. Paul's School Demolition for Additional Open Space

The proposed demolition of the Main Building and Ellis Hall at the former St. Paul's School to provide additional open space would be consistent with the existing zoning for the site, which permits municipal uses including public parks and playgrounds. The Proposed Action is not expected to have an adverse impact on existing zoning in the study area.

OPEN SPACE

The Proposed Action would add approximately seven acres of usable, public open space for the use and enjoyment by the residents of the Village. The removal of the Main Building and Ellis Hall on the project site would create new grassy fields and would allow for the use and enjoyment of the existing grassy areas on the project site which are currently not attractive as an open space resource due to the proximity of the buildings on the site. It is anticipated that the additional open space would be utilized by the current users of the existing recreational fields on the St. Paul's property. The new open space would provide needed, additional recreational open space for the users of the St. Paul's Recreational Complex.

The Proposed Action would be consistent with public policy as embodied in the zoning laws and the 2004 Village Board park dedication of the site.

The project would not have an adverse impact on open space in the Village, and it would not affect the ability of the Village to acquire any additional open space in the future. Rather, the Proposed Action would create an open space benefit and would not result in significant adverse impacts on open space.

HISTORIC AND ARCHAEOLOGICAL RESOURCES

ARCHAEOLOGICAL RESOURCES

Potential proposed grading in and around the locations of the footprints of the Main Building and Ellis Hall could disturb archaeological resources, if any resources are present. Therefore, prior to demolition, archaeological field testing would be taken by a professional archaeologist to assess the presence or absence of archaeological resources. Any artifacts that are encountered would be processed and catalogued. The resources would be placed in a safe and secure location for potential future display on-site or at an off-site location.

ARCHITECTURAL RESOURCES

Project Site

Demolition of the Main Building would have a significant adverse impact on historic resources. It would remove a contributing resource of the A.T. Stewart Era Historic District as well as a historic and visual landmark centrally located in the Village of Garden City on Stewart Avenue.

A number of alternatives to demolition of the Main Building and Ellis Hall, and hence, the avoidance of the significant adverse impact, have been proposed and studied extensively. These alternatives are described in detail in Chapter 11, "Alternatives," and include stabilizing the building for potential future reuse, and adaptive reuse proposals including private and municipal use.

Project Area

Demolition of the Main Building would adversely impact the context of Cluett Hall, which was built 15 years after the Main Building, as a gymnasium for St. Paul's School. To avoid direct, physical adverse impacts on this resource, an architect who is familiar with the treatment of historic buildings could be retained to design or review the design of the rebuilding, if necessary, of Cluett Hall's east façade in the location of the basement connector to the Main Building to be removed as part of the Proposed Action. In addition, a protection plan, listing measures that would be put in place during demolition activities, would be prepared and implemented to ensure that Cluett Hall is not inadvertently damaged during demolition of the Main Building.

Proximate Resources

As described above, with the exception of the Cathedral of the Incarnation there is no visibility between the Main Building and the other contributing properties of the A.T. Stewart Era Historic District. However, demolition of the Main Building would have a significant adverse impact on the thematically listed A.T. Stewart Era Historic District, as it would result in the removal of one of the monumental contributing resources of the historic district. The removal of this centrally located historic resource would adversely impact the historic character of the Village.

The Proposed Action would have no adverse impacts on the historic buildings on the Adelphi University campus. Although portions of the Main Building are visible from South Avenue in between and above the hedges that line the LIRR right-of-way, these views are at a distance and are sporadic. As such, the demolition of the Main Building would not adversely impact the context of the historic Adelphi University buildings.

AESTHETIC RESOURCES

The St. Paul's School Main Building is an iconic aesthetic resource in the Village, due to its striking Gothic architecture and visibility on Stewart Avenue and adjacent open spaces. As such, the demolition of the Main Building would constitute a significant adverse impact on the visual character and aesthetic resources of the Village.

Views from the athletic fields in the project area directly to the west of the Main Building, views east on Stewart Avenue, and views from the Middle School and its adjacent fields would be the most affected by the demolition, as there are direct views to the building from these locations. The removal of other, less direct views (i.e., west on Stewart Avenue; at the intersection of Stewart, Cherry Valley, and Cathedral Avenues; from discrete locations on Cherry Valley Avenue; from Saint Paul's Place; and from South Avenue) of portions of the Main Building, including the clock tower, from other portions of the study area would also result in the loss of a visual landmark in the area.

The large mature trees along Stewart Avenue would not be removed as part of the Proposed Action. Therefore, the Proposed Action would have no adverse impact on these aesthetic resources.

It should be noted that the proposed open space itself would fit into the visual character of the area, which is composed primarily of single family residences and open spaces including athletic fields and golf courses. The open space would not adversely impact other aesthetic resources in the area, as it would not obstruct views to these resources.

COMMUNITY CHARACTER

The proposed project would have a significant impact on that component of community character relating to aesthetic and historic resources because it would cause the loss of the Main Building, which some view as an iconic structure within the center of the Village. However, it would also provide a benefit to community character in the form of seven acres of additional public open space.

HAZARDOUS MATERIALS

The first phase of the building's demolition would be the removal of all hazardous materials required by law to be removed prior to demolition. This would be conducted by a contracting specialist, whose licenses, certifications, and insurances are all current, and it would be conducted under the direction and supervision of a licensed professional engineer. The work would be conducted, and all hazardous materials removed, transported, and disposed of in accordance with all applicable Federal, State, and County regulations and standards and using appropriate protective measures.

CONSTRUCTION

All demolition phases, including transport and disposal of demolition debris would be conducted in accordance with applicable standards and regulations (Federal, State, and/or County). The contractor would be asked to direct all vehicles carrying demolition debris onto a pre-determined route (i.e., Rockaway Avenue, to Herricks Road, and then to the Long Island Expressway). At the peak of demolition, it is estimated that the project would generate 24 trucks trips per day. For trucks traveling to and from the site, a stabilized construction entrance would be prepared in accordance with standard sediment and erosion control practices and dust control measures would be implemented. This would minimize the tracking of dust and dirt onto local roads. In addition, all exposed soil surfaces would be seeded, laid with sod or landscaped as soon as possible. These measures would be incorporated as part of the plans and specifications of the construction contract and enforced by the Village Engineer or his designated representative. The duration of the project is expected to be one year. It is expected that any adverse construction-related impacts resulting from Proposed Action would be temporary and minor in nature.

MITIGATION

The technical analyses presented in the EIS discuss the potential for significant adverse environmental impacts to result from the Proposed Action. Such potential impacts were identified in the areas of historic resources, aesthetic resources, and community character as a result of the loss of the St. Paul's School Main Building. Measures have been examined to minimize these anticipated impacts. There is no mitigation that would allow implementation of the Proposed Action and fully mitigate the significant adverse impacts. Measures that would provide partial mitigation include:

- Historic American Buildings Survey (HABS) Recordation that would provide photographic and plan documentation of the Main Building for archival purposes.
- Salvage of significant architectural elements, for preservation and display on- or off-site, or for sale for use in another structure. Salvage could include both exterior and interior features.

- Retention and reuse of a portion of the Main Building on the site. This could include retention of the chapel, all or a portion of the Main Building's Stewart Avenue façade, the clock tower, and/or the porte-cochere.
- Creating public outreach or education programs, such as lectures, exhibits, and/or publications (such as pamphlet on the history of St. Paul's School).

ALTERNATIVES

A number of alternatives to the Proposed Action were considered, as follows:

- The "No Action Alternative," which is required under the State Environmental Quality Review Act (SEQRA) and assumes no demolition of the St. Paul's School buildings and continuation of the current level of maintenance and security by the Village. The cost of this alternative is estimated to approach approximately \$165,000 per year based on the annual operating costs to maintain the Main Building with heat for an indeterminate period.
- A stabilization alternative that assumes major repairs are undertaken by the Village as a major capital project to stabilize the structures until such time as a feasible adaptive reuse materializes (ongoing maintenance also assumed by the Village). The cost of this alternative is estimated to be as high as approximately \$13.9 million in 2009 dollars plus approximately \$165,000 per year based on the annual operating costs to maintain and heat the Main Building expended by the Village until such time as an adaptive reuse is implemented. Alternatively, these tasks could be undertaken by a private sector non-profit conservancy at no expense to the Village.
- Adaptive reuse of the building by a private entity for senior housing with some public space, potentially with additional residential construction.
- Adaptive reuse of the buildings by a private entity for market rate housing with new residential construction on site and some public space.¹
- Adaptive reuse of the buildings by the Village for a municipal/civic center. The cost of this alternative is estimated at approximately \$28.7 million; and
- A proposal by the Committee to Save St. Paul's (CSSP) and the Garden City Historical Society for approximately 10,500 square feet of public use in the Main Building.

A comparative summary of the impacts of the alternatives is provided in **Table S-1**.

¹ It is assumed that the cost of the two private entity reuse alternatives would be borne by the developer.

Table S-1

Matrix Comparison of Proposed Action and Alternatives

Analysis Area	Proposed Action	No Action	Stabilization	Adaptive reuse with senior housing	Adaptive reuse with new construction and market rate housing	Municipal use	CSSP Proposal
Land Use and zoning	48.4 acre Village public open space	38 acre Village public open space with adjacent deteriorated structures	38 acre Village public open space with vacant adjacent historic structure preserved for undetermined future use	38 acre Village public open space with restored adjacent historic structure adaptively reused for residential use (potential land use/public policy conflicts with prior public open space designation)	38 acre Village public open space with restored adjacent historic structure adaptively reused for residential use (potential land use/public policy conflicts with prior public open space designation) and additional new construction of townhouses and structured parking	38 acres Village public open space with restored adjacent historic structure adaptively reused with municipal office uses (potential land use/public policy conflicts with prior public open space designation)	<u>38 acres Village public open space with partially restored adjacent historic structure with 10,500 SF adaptively reused for public uses (potential land use/public policy conflicts with prior park and designation)</u>
Open Space	7 acres of additional open space, centrally located to meet community recreational demands	No additional public open space	No additional public open space	No additional public open space	No additional public open space	No additional public open space	<u>No additional public open space</u>

Table S-1 (cont'd)
Matrix Comparison of Proposed Action and Alternatives

Analysis Area	Proposed Action	No Action	Stabilization	Adaptive reuse with senior housing	Adaptive reuse with new construction and market rate housing	Municipal use	CSSP Proposal
Community facilities and services	Minor additional maintenance of open space—no additional school-age students	Ongoing security for building and protection of public safety—no additional school-age students	Ongoing security for building and protection of public safety—no additional school-age students	Private operation of building with additional senior services and community center operated by the village. Increased demand on police, fire and sanitation services. No additional school-age students	An estimated <u>32</u> school age children (<u>24</u> public, <u>8</u> private). Increased demand on police, fire and sanitation services.	Major new municipal service structure including a significant capital project. No additional school-age students	<u>Ongoing security for building and protection of public safety—no additional school-age students</u>
Historic Resources	Significant adverse impact with demolition of historic building (both interior and exterior resources)	No significant impact due to demolition, but potential significant adverse impact to exterior and interior resources with continued deterioration of historic building	With stabilization, no significant impacts to historic exterior or interior resources due to demolition (but no known adaptive reuse)	Preservation of historic building exterior with significant modifications to interior	Preservation of historic building exterior with significant modifications to interior and contextual change due to additional townhouses	Preservation of historic building exterior with significant modifications to interior	<u>Potential preservation of historic building exterior with significant modifications to and partial restoration of interior</u>
Aesthetic Resources	Significant adverse impact with demolition of visual resource	Potential significant adverse impact if building is allowed to deteriorate and becomes unsightly.	Visual resource retained, no adverse impact.	No adverse impact, visual resource to be retained and assumes building would continue to be prominently visible on Stewart Avenue	No adverse impact, visual resource would be retained and assumes building would continue to be prominently visible on Stewart Avenue	No adverse impact, visual resource would be retained and assumes building would continue to be prominently visible on Stewart Avenue	<u>Potential visual impacts associated with altered or blocked views of portions of the interior during and after construction</u>
Community Character	Additional open space with loss of historic and visual resource	No additional open space with continued deterioration of historic and visual resource	No additional open space with vacant historic and visual resource	No additional open space with preservation of historic structure for private use	No additional open space with preservation of historic structure for private use and adjacent new construction	New municipal facility	<u>No additional open space with preservation of exterior of historic resource and partial restoration of interior</u>

Table S-1 (cont'd)

Matrix Comparison of Proposed Action and Alternatives

Analysis Area	Proposed Action	No Action	Stabilization	Adaptive reuse with senior housing	Adaptive reuse with new construction and market rate housing	Municipal use	CSSP Proposal
Trip generation, traffic	No additional trip generation nor an need for additional parking	No additional trip generation nor an need for additional parking	No additional trip generation nor a need for additional parking	<u>48</u> vehicle trips (maximum peak hour, Sunday) with need for added private parking and potentially displaced public parking	<u>79</u> vehicle trips (maximum peak hour) with need for added private parking and potentially displaced public parking	55 vehicle trips (maximum peak hour)	<u>55 vehicle trips (maximum peak hour) with no need for added parking</u>
Hazardous Materials	Remediation of hazardous materials	No Remediation of hazardous materials	Remediation of hazardous materials	Remediation of hazardous materials	Remediation of hazardous materials	Remediation of hazardous materials	<u>Limited remediation of hazardous materials</u>
Construction	Demolition and site grading	No significant construction or maintenance activities	Ongoing maintenance	Interior and exterior restoration of existing historic building, construction of parking	Interior and exterior restoration of existing historic building with new construction for townhouses and parking	Interior and exterior restoration of existing historic building	<u>Exterior restoration and partial interior restoration of existing historic building</u>

SUMMARY CHAPTERS

The EIS also contains summary chapters that summarize the potential impacts of the proposed project. These chapters include analyses of the project's potential short- and long-term, cumulative, and other environmental impacts; unavoidable adverse impacts; irreversible and irretrievable commitments of resources; growth-inducing aspects; impacts on the use and conservation of energy; impacts on solid waste management; and impacts on special groundwater protection areas. Unless the Proposed Action were abandoned and another alternative other than the "No Action" alternative chosen, there would be an unavoidable significant adverse impact on historic resources, aesthetic resources, and community character. The Proposed Action would be beneficial in terms of introducing new, usable open recreational space to the existing community. *