



To: Louis Minuto, Garden City Board of Trustees

Date: July 23, 2019

Memorandum

Project #: 20126.00

From: Allison McGovern, PhD, Senior Archaeologist, Cultural Resources Department, VHB

Re: Centre at St. Paul's School
Cultural Resources Due Diligence Memo

Introduction

This Due Diligence memorandum details the results of a desktop review of historic maps, photographs and narratives, as well as a site visit, for the proposed Centre at St. Paul's. Specifically, this memorandum addresses a portion of the property formerly utilized as the St. Paul's School. In addition to the review, this memorandum provides a preliminary site history to determine the presence of historic and archaeological resources, a preliminary assessment of potential impacts to cultural resources, and information about how those resources (if present) may be reviewed for potential impacts as the project moves forward.

VHB understands that the Centre at St. Paul's project is currently proposed as an adaptive reuse of the St. Paul's School for Boys into an athletic complex, including a soccer field and ice hockey rink. VHB understands that the St. Paul's School for Boys is part of a larger property identified as the St. Paul's School, located at 295 Stewart Avenue in the Incorporated Village of Garden City and owned by the Village of Garden City, comprising the Main building (Photograph 1), Cluett Hall (Photograph 2), the Field House (Photograph 3), the Cottages (Photograph 4), and the footprint of Ellis Hall. This memorandum addresses a portion of this overall property that includes only the St. Paul's School for Boys Main building, the footprint of Ellis Hall (which was demolished in 2014), and the immediate surrounding area (the "Project Site") (Figure 1). The St. Paul's School for Boys Main building is listed on the State and National Registers of Historic Properties (S/NRHP). The St. Paul's School was closed in 1991, and the building is currently vacant.

Methodology

Cultural resources include historic (above-ground) and archaeological (below-ground) properties. In order to identify previously-recorded historic properties and archaeological resources in the vicinity of the Project Site, VHB conducted online and desktop reviews of files held by the NYS Office of Parks, Recreation and Historic Preservation (OPRHP) Cultural Resource Information System (CRIS) and the online files of the National Park Service (NPS) National Register of Historic Preservation (NRHP). The NYS CRIS includes information about above-ground properties that are listed in the New York State Register of Historic Places and/or the NRHP, properties that have formal determinations of eligibility for inclusion in the State and/or National Registers (S/NR), and properties that have been identified as potentially historic, but have not been evaluated. In addition to this, the CRIS identifies areas of archaeological sensitivity where archaeological properties may be encountered during development projects.

In addition to the CRIS and NPS reviews, a desktop review of historic property atlases, historic and recent USGS maps, historic and recent aerial photographs, the online USDA Web Soil Survey, the list of Historic Sites and Landmarks in

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Nassau County,¹ Nassau County list of Historic and Cultural Assets,² the Historic and Archaeological Resources Chapter of the 2011 FEIS for Demolition of St. Paul's,³ and the Garden City Historical Society website were reviewed for a preliminary understanding of land use history, sensitivity for historic archaeological sites, and episodes of historic and modern ground disturbance.

Project Site History

The St. Paul's School for Boys is located within the historic, planned garden community of Garden City. In 1869, A. T. Stewart purchased 7,170 acres of Hempstead Plains from the Town of Hempstead and plans for the establishment of Garden City were underway shortly thereafter.⁴ The development concept was to build a garden city that adhered to the utopian ideals that guided much of mid-19th century American suburban planning.⁵ Stewart intended to build beautiful homes that he would rent to upper-middle and upper class businessmen and their families, but he intended to maintain ownership of the residential properties.

In 1876, A. T. Stewart died and his wife, Cornelia Clinch Stewart inherited the acreage. Mrs. Stewart changed the developmental direction of Garden City from building beautiful rental homes to creating a religious and educational community. Under Mrs. Stewart's tenure, the Cathedral of the Incarnation, the Bishop's See House, the St. Paul's School for Boys and St. Mary's School for Girls were constructed as a gift to the Episcopal Diocese that would also serve to commemorate her late husband's life.

The St. Paul's School for Boys (noted above) was commissioned by Cornelia Stewart in memory of her late husband, A. T. Stewart and constructed between 1879 and 1883.⁶ The school was run by the Episcopal Church, initially in Glen Cove, and then transferred to Garden City after Mrs. Stewart announced the new building as her gift to the Diocese. Students resided in other Garden City houses while the school was under construction.

Initially run as a military school, St. Paul's eventually evolved into a college preparatory school for boys; it functioned for nearly 100 years as an educational institution. Cluett Hall, which housed a gymnasium, was constructed adjacent to the Project Site in 1898. In 1969, Ellis Hall was constructed adjacent to the St. Paul's Main Building within the Project Site. Ellis Hall functioned as a library and science building (including chemistry and biology labs and a physics department). The building was named after Elwyn "Chip" A. Ellis, a Latin and English teacher at St. Paul's.

¹ <https://www.nassaucountyny.gov/DocumentCenter/View/2815/Historic-Sites-and-Landmarks?bidId=>, accessed July 10, 2019.

² <https://www.nassaucountyny.gov/DocumentCenter/View/1190/Appendix-C---Historic-and-Cultural-Assets?bidId=>, accessed on July 10, 2019.

³ https://www.gardencityny.net/vertical/sites/%7B82C80390-C4CA-486E-AA10-408538E064A1%7D/uploads/Historic_Resources.pdf, accessed July 10, 2019.

⁴ "Garden City: American Versions of Utopia," Richard Guy Wilson, in *Gardens of Eden: Long Island's Early Twentieth Century Planned Communities*, edited by Robert B. MacKay, W. W. Norton & Company, 2015, pages 22-45.

⁵ *Ibid*, page 25.

⁶ According to the NR Nomination Form, the building was constructed in 1883.

Around 1991, the Episcopal Diocese closed the school and the Village of Garden City subsequently purchased the property from the Diocese. Ellis Hall was demolished in 2014 for green space, and the building cornerstone was preserved and relocated to the Garden City Historical Society.

Setting/Site Visit

A site visit was performed on June 12, 2019 to make note of existing conditions, document any potential historic/archaeological resources on the property, and to document disturbance. The Project Site is located in a park-like setting amidst suburban development. The St. Paul's School is surrounded by manicured lawn with a few deciduous trees near the paved driveway, and overgrown shrubbery and ornamental plantings adjacent to the building. Construction fencing is present along the rear of the building to prevent visitors from getting too close to the building, where there is danger of falling building debris.

VHB personnel entered the first floor and basement of the building to assess the presence or absence of historic materials remaining in the building. On the first floor, several commemorative plaques constructed of stone/marble, metal and wood were identified (Photograph 5). In addition to the commemorative plaques, three lighting fixtures are still present in the front parlor and ballroom (Photographs 6 and 7). In the cafeteria, two murals/wall art pieces were identified (Photographs 8 and 9). All of these items may be of historic interest. In the Chapel, some pulpit furniture and pews (Photographs 10-12), an organ (Photographs 13 and 14), and stained-glass windows are still present. VHB understands that the design team intends to remove these items and incorporate them into the new, proposed design. If these items cannot be reused or repurposed by the design team, then VHB recommends these items be removed and preserved by an interested party, such as the Garden City Historical Society. VHB recommends a removal and temporary storage/curation plan be developed for these historic artifacts during the design phase.⁷

Historic/Above-Ground Results

The St. Paul's School for Boys (91NR00239) was listed on the NR in 1978 as part of a thematic resource nomination for the A. T. Stewart Era Historic District. The building is significant under Criterion A for its contributions to our understanding of social history in the area of community planning and development, Criterion B for its association with A. T. Stewart (a self-made millionaire who during his time was one of the wealthiest businessmen in New York), and Criterion C for architectural significance for its exemplification of the Gothic Revival style. In addition to the NR criteria (and despite the current conditions of disrepair), the building retains integrity of design, location, construction and feeling.

The A. T. Stewart Era Historic District, of which the St. Paul's School is a contributing resource, is a non-contiguous group of 50 properties that were nominated to the NR as a Thematic Group in 1978. The 50 properties that were originally listed included residential, commercial, religious and civic structures that were constructed between 1871 and 1893 as part of the planned garden community that was called Garden City. According to the NRHP database, the

⁷ VHB understands that a plan is already proposed for the removal and restoration of the Tiffany stained-glass windows in the Chapel.

district is listed based on Criteria A, B, and C with areas of significance in Community Planning and Development, Social History, and Architecture.

The St. Paul's School for Boys is the only extant building within the Project Site. Cluett Hall, which was constructed in 1898 to house the school's gymnasium, is located adjacent to the Project Site. The Field House, constructed around 1962, is located north of Cluett Hall and is currently occupied by several tenants. In addition, a series of Cottages was constructed between 1962 and 1976 north of the Project Site. Cluett Hall, the Field House, and the Cottages have not been evaluated for eligibility on the NR.

Archaeology Results

Archaeological deposits range in date from 50 years old to several thousands of years old. Pre-contact archaeological sites are those sites that contain the remains of ancient Native American settlements that predate European arrival. Post-contact archaeological sites are characterized by evidence of a range of activities and human groups that are temporally associated with the period after European arrival. The potential for encountering archaeological resources within the Project Site is determined by a series of factors, including data from sensitivity models (which are based on proximity to fresh water and other vital natural resources); documentation of known, nearby archaeological sites (recorded in the CRIS); the presence of known historic resources (e.g., map-documented structures and/or cemeteries); and the presence of historic-period and/or recent ground disturbance (e.g., land development). In general, disturbed areas have a very low potential for the presence of intact archaeological deposits and subsurface features.

Based on a preliminary review of archaeological sensitivity models and archaeological site files in CRIS, the overall sensitivity of the Project Site for the presence of pre-contact (Native American) archaeological sites is low.

Euro-American settlement in the vicinity of Garden City is well-documented on mid- to late-19th century maps, though settlement was initiated earlier. Prior to A. T. Stewart's purchase, the land that comprises Garden City was once part of the Hempstead Plains and was used agriculturally. Described as barren brush, the Hempstead Plains provided an extensive range for grazing animals and cattle rearing. These past activities are likely to leave few material traces in the archaeological record. However, since St. Paul's was constructed in the late 19th century, the educational and domestic activities of the children and adults that occupied the site over the subsequent 100 years might have left traces in the archaeological record. Indeed, according to the Historic and Archaeological Resources Chapter of the 2011 FEIS, the A. T. Stewart Era Historic District NR nomination form indicates that archaeological resources associated with construction and use of the school building may be present. In addition to this, the c.1969 Ellis Hall, which was demolished in 2014, may have left traces of structures/foundations and activities. Based on this understanding, the Project Site has a moderate sensitivity for the presence of late 19th through 20th century archaeological resources.

Cultural Resources Review

A review of the Garden City Village Code resulted in no indications that cultural resources review is required at the Village level for Site Plan approvals, Building or Demolition Permits, and/or Architectural Design Review Board (ADRB) approvals.

At the State and Federal levels, cultural resources are subject to review under Section 14.09 of the New York State Historic Preservation Act of 1980 (SHPA), as amended, for New York State agency permits and approvals (e.g., State Pollutant Discharge Elimination Systems (SPDES) General Permit for Stormwater Discharges from Construction Activity, Stormwater Pollution Protection Plan (SWPPP), and capital-funded projects), and Section 106 of the National Historic Preservation Act of 1966 (NHPA), as implemented by Federal regulations at 36 CFR Part 800, for Federal agency permits and approvals. These reviews would be triggered by, in the case of State actions, interagency agreements with OPRHP. For instance, if the project will require a SPDES Permit, the project would require a review for potential impacts to cultural resources by OPRHP in accordance with Section 14.09 of the SHPA. This approval process is outlined in a Letter of Resolution (LOR) developed between the Department of Environmental Conservation (DEC) and OPRHP.⁸ A similar review process would be necessary through Section 14.09 of the SHPA if NYS capital or grant funds are used for project development.

When Federal permits, funding or approvals are involved, a similar review of cultural resources would be required in accordance with Section 106 of the NHPA to determine the Area of Potential Effect (APE) for cultural resources, identify known and unknown cultural resources, and determine if the proposed work would adversely impact those resources. For instance, for projects that are funded through Federal grant programs, the Section 106 review process considers the effects of the Federally-funded project on historic properties and allows for the American Council of Historic Preservation (ACHP) to comment on those projects before Federal funds are disseminated. This is particularly pertinent if Federal funds are sought to support construction, repair, restoration, renovation and/or rehabilitation of NR-listed buildings or structures. In accordance with Section 106, the proposed renovation must adhere to the Secretary of the Interior's Standards for the Treatment of Historic Properties.⁹

Cultural resources review is coordinated directly with OPRHP. The process is initiated by submission of a project notification through CRIS, which includes (at minimum) information about the proposed development program, lead review agency, State and/or Federal funding and approvals, and photographs of existing conditions. OPRHP will respond to a project notification with its determination of potential impacts to historic and archaeological resources within 30 days.

Preliminary Potential Effects Assessment

Formal review (either through Section 106 of the NHPA and/or Section 14.09 of the SHPA) will be required to identify any new historic properties (if present) and determine whether previously-recorded and/or newly identified resources will be adversely affected by the proposed project. However, because Village of Garden City Trustees have voiced concerns about whether or not the proposed project will impact the status of the property as NR-listed and/or the integrity of the property, VHB is providing a preliminary determination of potential effects (specifically how the proposed project will impact the historic integrity of the property) and an assessment of whether or not the project will impact the property's status as listed on the NR.

⁸ See https://www.dec.ny.gov/chemical/43133.html#State_Historic_Preservation_Act, accessed on July 15, 2019.

⁹ <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>, accessed on July 17, 2019.

Based on the results of this due diligence assessment, as well as a preliminary consultation call with Olivia Brazee from the NYS OPRHP's Division of Historic Preservation, the project (as currently proposed) is expected to have an Adverse Impact on the NR-listed St. Paul's School.¹⁰ The Adverse Impact determination is based on the proposed renovation which, as Ms. Brazee pointed out on the consultation call, consists of a radical approach to remove historic materials and make changes to character-defining spaces (such as the Chapel), all of which will impact the historic integrity of the property. Although this approach includes incorporation of historic materials into the proposed reuse of the building, there is no program for historic preservation, and the proposed work does not meet the Secretary of the Interior's Standards for the Treatment of Historic Properties.¹¹ Therefore, the proposed changes would constitute an Adverse Impact to the property. The Adverse Impact and proposed redevelopment would not stop the proposed project from being developed, nor would it cause the site to be de-listed from the NR: the site would remain listed on the NR. However, if State or Federal permits, approvals, or funding are sought for the project, then a mitigation strategy would have to be built into the proposed project as it moves forward to mitigate the Adverse Impact.

Mitigation of potential impacts to historic and/or archaeological resources involves close coordination with the lead review agency, OPRHP, and applicable State and Federal agencies (when State or Federal permits and/or funding are involved). Mitigation measures would be detailed in a LOR or Memorandum of Agreement (MOA) between the applicant (project sponsor) and the involved agencies, describing the measures for avoiding, minimizing, or mitigating the adverse effects on historic and/or archaeological resources. In this case, Ms. Brazee suggested that mitigation would likely include Historic American Building Survey (HABS) level documentation (black and white photography, historic architectural plans, and an historic narrative) prior to the proposed impacts.

Due to the buried nature of archaeological resources, the potential for direct effects to archaeological resources is currently unknown. While the Project Site appears to have a low sensitivity for the presence of pre-contact archaeological resources, the sensitivity of the site for late 19th and early 20th century archaeological deposits associated with educational and domestic activities at the site is moderate. As mentioned in the 2011 FEIS, archaeological field testing (such as a Phase I archaeological survey) by a professional archaeologist is recommended prior to demolition, clearing, and new construction at the site.

Further Considerations

As mentioned earlier, if State or Federal funds or grants are sought for this project in the future, cultural resources review would be required. As indicated in the consultation call with Olivia Brazee of OPRHP, some examples of grants that would require formal cultural resources review include the Empire State Development's (ESD) Restore New York Communities Initiative, the Dormitory Authority of New York State (DASNY), and Community Block Development Grant (CBDG) programs. In these instances, because the proposed changes would not adhere to the Secretary of the

¹⁰ A preliminary consultation conference call on June 10, 2019 involved Olivia Brazee (Technical Assistance and Compliance Unit, OPRHP Division of Historic Preservation), Allison McGovern (VHB), Carlos Cardoso and Hilary Bingnear (Beyer Blinder Belle), and Michelle Dioniso (Thornton Thomasetti). During this call, the proposed project was introduced to Ms. Brazee, the regional ORPHP technician who would review the project if State approvals are required.

¹¹ These Standards offer guidelines for four approaches to the treatment of historic properties: preservation, rehabilitation, restoration, and reconstruction.

Interior's Standards for Treatment of Historic Properties, VHB anticipates that mitigation of the impacts to cultural resources would be required.

In addition to these economic development funding opportunities, there may be State and Federal funding opportunities for historic preservation, such as through the OPRHP's Environmental Protection Fund, not-for profit grant programs such as Save America's Treasures, and the Federal Historic Tax Credit program.¹² The Federal Historic Rehabilitation Tax Credit program, for instance, allows a 20% tax credit for the substantial rehabilitation of historic properties. However, for these programs, the proposed work must adhere to the Secretary of the Interior's Standards for the Treatment of Historic Properties.

The project may also be eligible for funding opportunities through private foundations, such as the Robert David Lion (RDL) Gardiner Foundation, which support restorations and renovations of historic properties through private endowments. In general, private funding opportunities would not necessitate State or Federal cultural resources review.

VHB's Cultural Resources Division can provide guidance on the process for determining eligibility for the Federal Historic Rehabilitation Tax Credit program, but VHB recommends consultation with an accountant for determining the cost benefits of the program. VHB can also provide guidance in determining eligibility of the proposed project for the above-mentioned, as well as additional, economic development funding programs, as that determination is beyond the scope of this memorandum.

Finally, VHB recommends initiating consultation with OPRHP for cultural resources review early on in the development process, as this will reduce delays for permits and approvals in the future, if and when they are needed. VHB recommends consulting with OPRHP to complete the HABS level documentation prior to any changes in the structure (including abatement) which may alter the integrity of the building and/or character-defining spaces.

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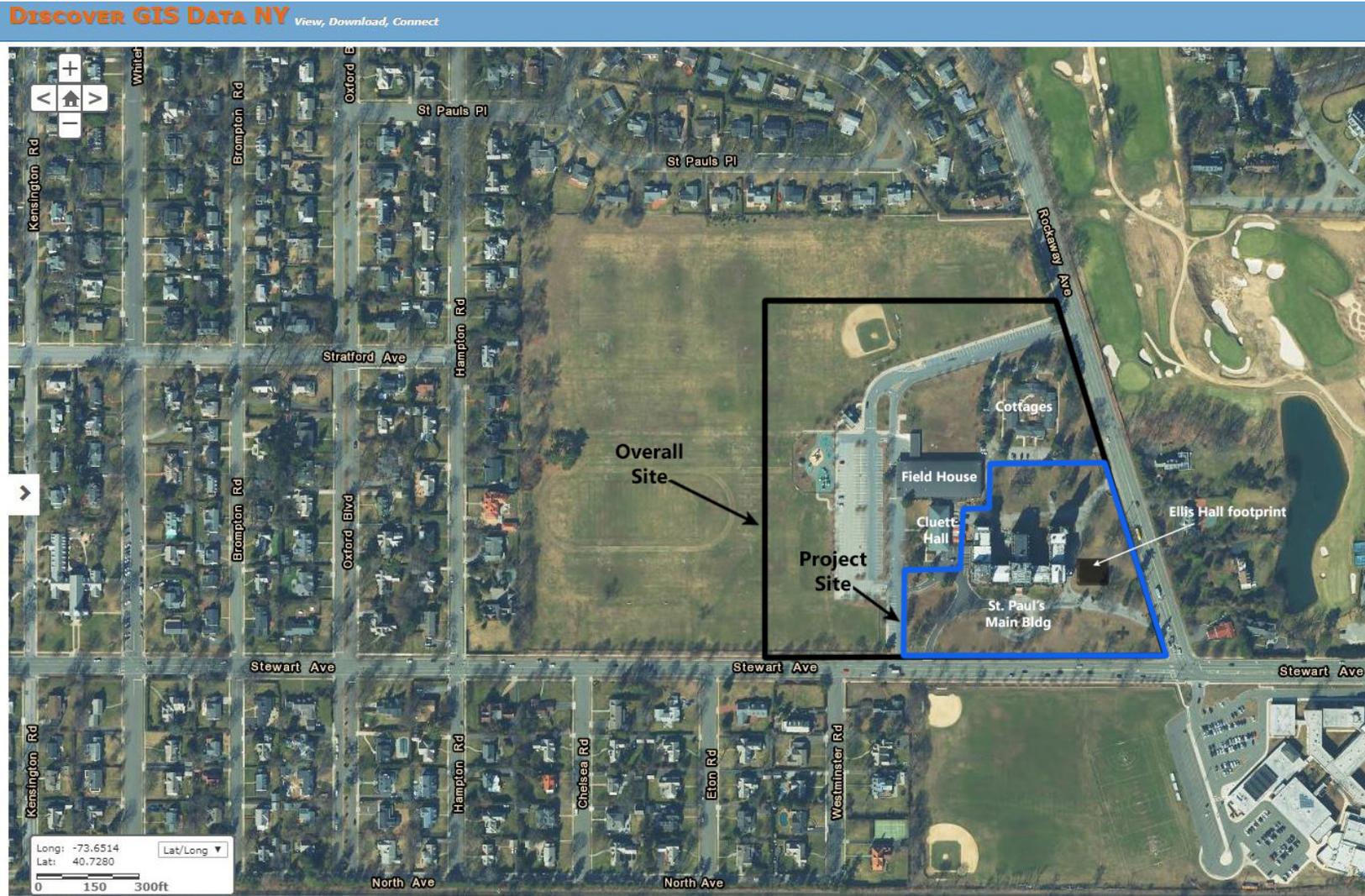
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¹² Preservation assistance is offered through OPRHP here <https://parks.ny.gov/shpo/preservation-assistance/>, accessed on July 17, 2019.



Figure 1. Project Site.



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Photograph 1. St. Paul's School for Boys Main Building, southwest elevation.



Photograph 2. Cluett Hall, southeast elevation.



Photograph 3. St. Paul's Field House, east elevation.



Photograph 4. The Cottages, view is northeast.



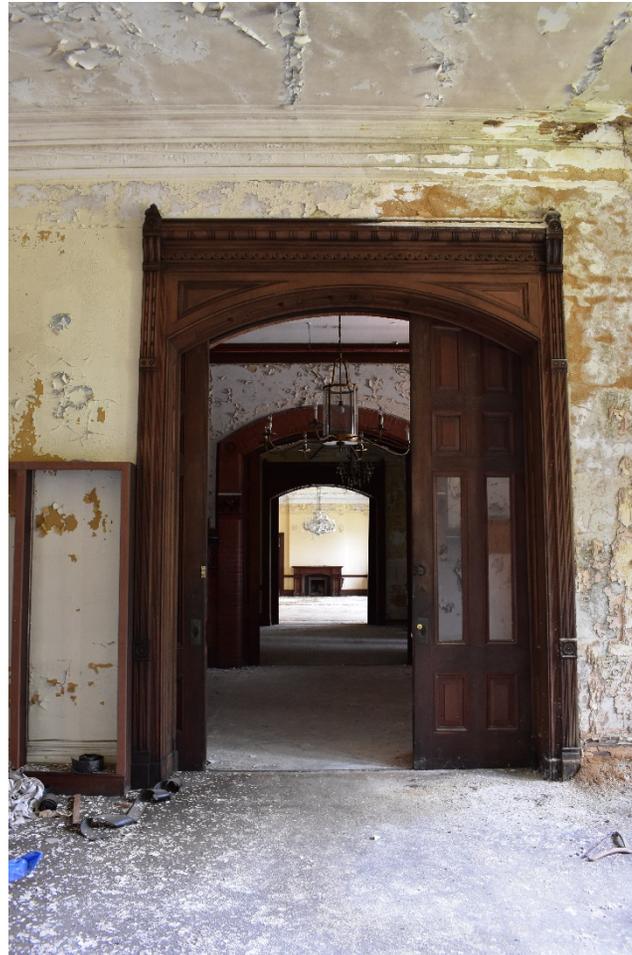
Photograph 5. Marble and metal commemorative plaques on the walls in one of the front rooms of the St. Paul's School of Boys Main Building. There are roughly 10 stone monuments with the names of Head Boys and Senior Monitors from c.1894-1972. There are also several smaller bronze monuments with the names of various award winners.





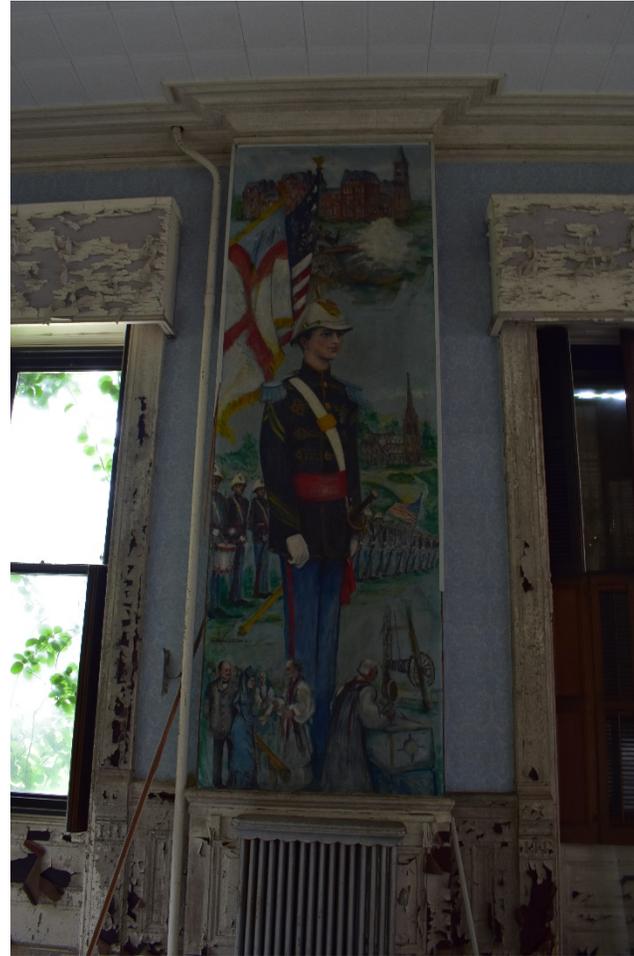
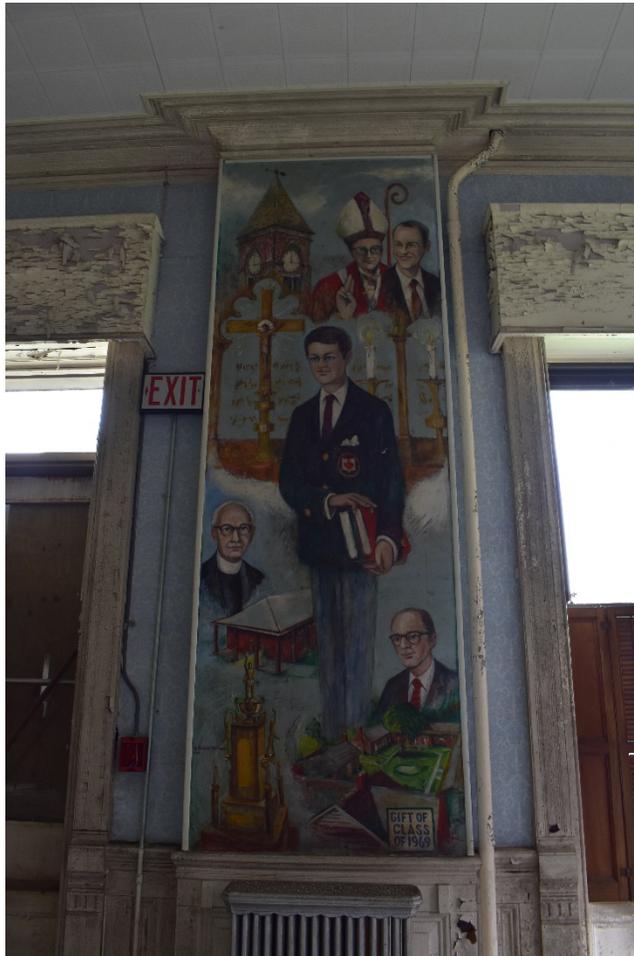
Memorandum

Photographs 6 and 7. Lighting fixtures suspended in the ballroom of the St. Paul's School for Boys Main Building.



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Photographs 8 and 9. Wall art in the dining hall of St. Paul's School for Boys Main Building.



Photographs 10, 11, 12. Pulpit furniture and pews in the Chapel at St. Paul's School for Boys Main Building.



Photographs 13. View of the organ within the Chapel.



Photograph 14. View of the keys of the organ within the Chapel.

