



Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO
Governor

ROSE HARVEY
Commissioner

August 9, 2018

Mr. Mike Grabowski
Zoning Board Chair
Town of Gaines
14087 Ridge Road
Albion, NY 14411

Re: SEQRA
Town of Gaines Dollar General
Ridge Road West, Gaines, Orleans County
18PR03527

Dear Mr. Grabowski,

Thank you for requesting the comments of the Office of Parks, Recreation and Historic Preservation's Division for Historic Preservation (OPRHP/DHP) as part of your State Environmental Quality Review Act (SEQRA) process. These comments are those of OPRHP/DHP and relate only to historic/cultural resources. It is our understanding that the New York State Department of Environmental Conservation will not be involved in this action, as we thought was the case, because less than an acre of land will be disturbed. If state or federal agencies become involved with the project, please inform us.

The project consists of the construction of a Dollar General retail store directly across the street from the District 5 Schoolhouse, a building that contributes to the Cobblestone Historic District, which was designated a National Historic Landmark in 1993. This designation is the highest recognition that the United States Department of the Interior can bestow on a property or district in our country.

Landmark designation recognizes the exemplary historic or architectural significant a property may have in the history of the nation. There are only 262 such designation in New York and less than 3,000 nationwide. Along with the Universalist Church and the Ward House, the Cobblestone District is the *only* National Historic Landmark in Orleans County. The schoolhouse, which was constructed in 1849, is an exceptional example of both the Greek Revival Style and the unique cobblestone method of construction, which is almost exclusively found in the central-western part of New York.

It is our opinion that the construction of a generic retail building at this location will significantly alter the District 5 Schoolhouse's visual environment and setting. The introduction of a modern generic commercial store with its associated 45 space parking and service areas will greatly impact the historic character of the National Landmark school as well as the two other nearby Landmarked cobblestone buildings.

Division for Historic Preservation

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We would recommend that as part of the “hard look” taken by the Lead Agency at direct and indirect impacts that this project may have on the environment (including historic resources), a full assessment of alternatives should be examined. These alternatives should include:

- Is there an appropriate alternative site for the project that would not directly impact National Historic Landmark properties? An alternate location would be the preferred alternative for our office.
- If an alternative site is not found, can the site be redesigned to have less of a visual impact? We recommend that the parking lot be situated to the side of the building instead of the front and that the number of parking spots be pared down to the minimum amount necessary. A side parking lot could be visually screened to lessen the project’s visual impact from the schoolhouse and overflow parking in the rear for employees and customers could be installed to reduce the size of the parking lot that is visible from the street.
- Can a strong vegetative buffer be planted to visually screen the parking lot and building from the road? A successful vegetative buffer should:
 1. Have a mixture of deciduous and coniferous indigenous trees and shrubs.
 2. Consist of trees that are at least a 4-inch caliper and are balled and burlapped.
 3. Contain trees that are planted in a staggered pattern, not a row.
 4. Be at least 4 feet deep.
 5. Be maintained for the life of the project.

We understand that the developer and the Town of Gaines have already negotiated a low-lying sign, which is a good beginning for minimizing impact to the historic school and adjacent properties.

We are happy to continue to review design revisions upon request and to provide the Lead Agency with our ongoing comments as experts in the field of historic resources. If I can be of further assistance, please contact me at 518-268-2158.

Sincerely,



Sloane Bullough
Historic Sites Restoration Coordinator via e-mail only