

ANDREW M. CUOMO Governor ROSE HARVEY
Commissioner

July 16, 2015

Hon. Todd Tancredi Supervisor, Town of Poughkeepsie One Overocker Road Poughkeepsie, NY 12603

Re: SEQRA

Proposed Redevelopment/Former Hudson River Psychiatric Hospital

Poughkeepsie, Dutchess County

15PR

## Dear Supervisor Tancredi:

I am writing as a follow up to the recent site visit made by staff from the Office of Parks, Recreation and Historic Preservation's Division for Historic Preservation (OPRHP) to the former Hudson River Psychiatric Hospital.

During this site visit and on previous occasions our staff met with members of the development team and local officials to tour various sections of the facility. It was our goal to obtain a better understanding of the current conditions of the buildings on the campus and the redevelopment plan. The information gathered was intended to help us provide the local Lead Agency, under the State Environmental Quality Review Act, with substantive comments in a timely manner once the formal environmental review begins.

In an effort to ensure timely and comprehensive comments from this office we are submitting preliminary information to you now so that the Lead Agency can expand on some of the open sections found in the 2009 (or subsequent) Final Scoping Document for the project.

As you are undoubtedly aware, the core of the complex was given the Nation's highest preservation status when it named as a National Historic Landmark (NHL) in 1989. This designation by the National Park Service included within its boundary the central Administration Building (Bld. 51<sup>1</sup>), including the north and south flanking patient wings and the connected service wings to the east.

This section or core of the complex was found to be of National significance for its association with one of the country's leading late 19<sup>th</sup> century architects, Frederick Clarke Withers. Considered to be one of his most significant commissions the main building complex epitomizes the High Victorian Gothic style of architecture in the United States. The complex is also

<sup>&</sup>lt;sup>1</sup> Building numbers relate to the 1991 OPRHP Determination of National Register of Historic Places Eligibility maps entitled "Key Plot Plan, Hudson River State Hospital, Poughkeepsie, New York, which are enclosed with this letter.

significant as an exceptional example of the theories regarding hospital design for the treatment of mentally ill individuals as developed and promoted by Dr. Thomas Kirkbride. Lastly, the Landmark portion of the facility was also recognized for its landscape, which was designed by Calvert Vaux and Frederic Law Olmstead.

Within the boundary of the designated NHL but identified in 1989 as *non-contributing* to this highest level of designation are the Bus Terminal (Bld. 36), Plant Facilities (Bld. 40), Firehouse/Recreation Offices (Bld. 41), Blacksmith Shop (Bld. 42), Carpenter/Machine Shop (Bld. 43), Outdoor Pavilions (Bld. 44 & 46), Mortuary/Laboratory (Bld. 45), Laundry/Tailor Shop (Bld. 50) and a Refreshment Stand (Bld. 166).

As you know the Type I list in the SEQRA regulations states in part, "any Unlisted action (unless the action is designed for the preservation of the facility or site) occurring wholly or partially within, or substantially contiguous to, any historic building, structure, facility, site or district or prehistoric site that is listed on the National Register of Historic Places, or that has been proposed by the New York State Board on Historic Preservation for a recommendation to the State Historic Preservation Officer for nomination for inclusion in the National Register, or that is listed on the State Register of Historic Places" (9 NYCRR §617.4[9]). This definition clearly includes the National Historic Landmark portion of the complex and in our opinion the larger hospital complex district (as defined by a 1991 site survey referenced below) based on the immediacy and historic interconnection of the buildings. We would recommend that this area and the involved buildings be included in your "hard look" at potential impacts to historic/cultural resources under SEQRA.

In addition to the SEQRA review for this action we would anticipate that a project of this scale would require or involve some level of state and/or federal permitting or possibly funding. Such government actions require the involved state and/or federal agencies to undertake a substantive historic preservation review in accordance with either Section 14.09 (NYPRHPL) or Section 106 (NHPA). Under these statutes resources that are listed in or determined to be eligible for inclusion in the New York State and National Registers of Historic Places must be taken into consideration in the project planning process. We believe that it is important that any outcome of the SEQRA process must be in alignment with any future state or federal agency review. If not, future permits or funding could be jeopardized.

Regarding the National Register listed status of the various parts of the complex for the purposes of SEQRA and potential state and federal review we offer the following overview. In 1991 a number of former New York State Psychiatric Center complexes were designated for disposal by the state. As part of this process and to fulfill the involved agency's responsibilities under Section 14.09 of New York State Parks, Recreation and Historic Preservation Law (PRHPL) our office was asked to evaluate each of the facilities. (see 9 NYCRR §428.4.c) As a result our office undertook a more comprehensive evaluation of the former Hudson River Psychiatrist Hospital. Our assessment looked beyond what was found to be nationally significant as part of the National Park Service's 1989 assessment. We determined that the historic importance of the facility extended beyond the Wither's designed core and the assigned period of significance for the NHL, which extended from 1867 to 1886.

The 1991 assessment looked at a total of 123 resources associated with the former State Hospital not including the previously designated NHL (Bld. 51 complex). At this time our office found that there were two historic districts associated with the complex. The first included the NHL property as well as much of the surrounding components of the complex. It was defined as follows:

"In addition to the NHL designated main building, the district includes the following categories of significant contributing resources: 1) The nineteenth century support

buildings associated with Withers' original design for the hospital, 2) The intact remnants of the Olmsted designed landscape including the curvilinear road pattern, trees, and rolling, open topography that characterize the grounds surrounding the main building, 3) The later buildings dating to the turn-of-the-century and early twentieth century (pre-1941). Most of these buildings were constructed of brick, to complement the main building, and are historically significant for their association with the growth and development of the hospital during the early twentieth century. A number, including the library, pilgrim home, amusement hall, and Catholic chapel, are also architecturally significant as intact examples of the Colonial Revival, Classical Revival, and early English Gothic styles."

The second historic district was located east of the main hospital grounds and represented the expansion of the hospital complex in the early twentieth century. This complex of buildings includes Hillcrest, Cleveland home, Ross and a small cluster of buildings to the southwest of Hillcrest. A third area of building located west of US Route 9 and extending to the Hudson River was not assessed.

Within the boundary of the first historic district, which appears to be the focus of this project, we assessed the 90 additional buildings that were not part of the NHL (Bld. 51). Of these, 53 were noted as *contributing* to the district and 37 are *non-contributing* to the district. In the intervening 25 years since this survey was completed additional buildings that had once been identified as contributing have lost significant architectural integrity due to sever deterioration. Of the remaining contributing buildings (outside of the NHL structure) many are now isolated and surrounded by deteriorating non-contributing structures. While the history of the larger district and the innovations in mental health care associated with the Kirkbride plan campus survives, many if not all of the secondary and support structures appear to have reached the end of their service life. We regretfully agree with the development team that the buildings located to the east and northwest of the NHL administration core cannot be reasonably adapted for a modern use based on both fiscal and programmatic reasons. We also concur that the more modern 1960s hospital buildings located to the south of the NHL are of a scale that make reasonable private adaptive reuse impractical in this location.

With that stated, OPRHP is strongly committed to the protection and reasonable adaptive reuse of F. C. Wither's National Historic Landmark building. Having agreed that everything surrounding the NHL complex can be removed, thus establishing a clean slate for redevelopment, our office must insist on the inclusion of the Administration/Ward complex in any future redevelopment. We understand that the condition of the northern and southern wings pose a significant redevelopment challenge, but we are open to any discussion on how they might be reconstructed or how portions of them might be incorporated into a landscape plan. Similarly, the eastern wings have sufficient integrity for future redevelopment consideration. Any plan that would demolish these sections of the NHL would need to demonstrate that a thorough and conscientious effort to assess options had been undertaken by the development team.

Regarding the central core of the NHL building, OPRHP must be clear in our comments that this structure must be adaptively reused utilizing the Secretary of the Interior's Standards for Rehabilitation in any development plan for the site.

In addition to the NHL portion of the property, our office also urges that the Superintendent's Residence (1904, Bld. 59), the Chapel (1906, Bld. 28), the Protestant Chapel (1925, Bld. 35), the Library (1910, Bld. 73), the Staff Residence (1932, Bld. 12), Amusement Hall (1905, Bld. 38) and the semi-intact Vaux/Olmstead landscape plan west of the NHL Administration complex be retained in any future redevelopment plan.

It is our belief that our recommendations as outlined above to the Lead Agency and any involved state or federal agencies are reasonable and balance historic preservation needs with those of the community and the development team.

Within the 6,000 National Register of Historic Places properties and districts found in New York State there are less than 260 National Historic Landmarks. It is within this most elite group of preeminent historic places that the former Hudson River State Hospital is recognized. I believe the Lead Agency, the involved state and federal agencies and this office would agree that such a distinction demands a creative and flexible solution that will allow the Landmark to survive and find a new, modern and productive use. If you should have any questions regarding our comments, please do not hesitate to contact me at (518) 268-2166.

Sincerely,

John A. Bonafide

Director,

Technical Preservation Services Bureau

enc: 1991 OPRHP Determination of Eligibility

Building Resource Data List

## District Building Resource Data List (1991)

USN	Туре		Name	
2714.00009	Building	6	BLDG 6/VALVE HOUSE (1867)	Contributing
2714.000091	Building	9	BLDG 9/CARPENTER SHOP (1893)	Contributing
2714.000404	Building	10	BLDG 10/PILGRIM HOME/STAFF RES. (1932)	Contributing
2714.000333	Building	11	BLDG 11/MARRIED EMPLOYEES BLDG (1932)	Contributing
2714.000334	Building	12	BLDG 12/5-FAMILY STAFF BLDG #4 (1932)	Contributing
2714.000405	Building	13	BLDG 13/RYON HALL-W. WING/TREATMENT (1932)	Contributing
2714.000406	Building	14	BLDG 14/RYON HALL E. WING/TREATMENT (1932)	Contributing
2714.000407	Building	15	BLDG 15/RYON HALL - CENTER PT./KITCHEN (1932)	Contributing
2714.000093	Building	16	BLDG 16/HOSE CART HOUSE (1889)	Contributing
2714.000408	Building	18	BLDG 18/STAFF GARAGE (1934)	Contributing
2714.000409	Building	20	BLDG 20/SHED (1945)	NON-CONTRIBUTING
2714.000094	Building	21	BLDG 21/PAINT SHOP/OLD POWER HOUSE (1894)	Contributing
2714.000410	Building	22	BLDG 22/SHED (1945)	Contributing
2714.000411	Building	23	BLDG 23/STAFF HOUSE #11 (1945)	Contributing
2714.000346	Building	25	BLDG 25/PAVILION-PATIENTS' SHELTER (1920)	Contributing
2714.000347	Building	27	BLDG 27/GARAGE (1918)	Contributing
2714.000098	Building	28	BLDG 28/CATHOLIC CHAPEL (1906)	Contributing
2714.000099	Building	29	STAFF BLDG#15/BLDG 29-GARDNER'S COTTAGE (NOW #139)*	Contributing
2714.000335	Building	29	BLDG 29/STAFF HOUSE #13 (1904)	Contributing
2714.000412	Building	30	BLDG 30/GARAGE/STORAGE (1950)	NON-CONTRIBUTING
2714.000336	Building	33	BLDG 33/POWERHOUSE & MACHINE SHOP (1929)	Contributing
2714.000337	Building	35	BLDG 35/PROTESTANT CHAPEL (1925)	Contributing
2714.000413	Building	36	BLDG 36/STORAGE (1942)	NON-CONTRIBUTING
2714.000338	Building	37	BLDG 37/ELECTRICAL SHOP & STORAGE (1935)	Contributing
2714.000101	Building	38	BLDG 38/AMUSEMENT HALL (1905)	Contributing
2714.000102	Building	40	BLDG 40/STOREHOUSE & COLD STORAGE (1900)	Contributing
2714.000103	Building	41	BLDG 41/FIREHOUSE (1903)	Contributing
2714.000104	Building	42	BLDG 42/BLACKSMITH/GARAGE (1906)	Contributing
2714.000105	Building	43	BLDG 43/CARPENTER SHOP AND GAS HOUSE (1870)	Contributing
2714.000414	Building	44	BLDG 44/OUTSIDE PAVILION (1920)*	Contributing
2714.000106	Building	45	BLDG 45/MORTUARY & LAB (1896)	Contributing
2714.000415	Building	46	BLDG 46/OUTSIDE PAVILION (1920)*	Contributing
2714.000107	Building	47	BLDG 47/STAFF RESIDENCE (1900)	NON-CONTRIBUTING
2714.000416	Building	48	BLDG 48/STAFF/TENANT HOUSE (1900)	NON-CONTRIBUTING
2714.000417	Building	49	BLDG 49/STOREHOUSE (1955)	Contributing
2714.000108	Building	50	BLDG 50/LAUNDRY & TAILOR SHOP (1871)	Contributing
2714.000089	Building	51	BLDG 51/MAIN/ADMIN (1871) - NHL	NHL LISTED
2714.000418	Building	54	BLDG 54/OUTSIDE PAVILION (1965)*	NON-CONTRIBUTING
2714.000419	Building	55	BLDG 55/REHABILITATION CTR (1969)	NON-CONTRIBUTING

2714.000420	Building	56	BLDG 56/BUS GARAGE (1905)	Contributing
2714.000421	Building	57	BLDG 57/GREENHOUSE (1897)	Contributing
2714.000109	Building	58	BLDG 58/STAFF COTTAGE (1897)	NON-CONTRIBUTING
2714.000110	Building	59	BLDG 59/SUPERINTENDENT'S RESIDENCE (1904)	Contributing
2714.000422	Building	60	BLDG 60/GARAGE (1906)	NON-CONTRIBUTING
2714.000339	Building	61	BLDG 61/STAFF HOUSE #10 (1867)	Contributing
2714.000423	Building	62	BLDG 62/TOOL STOREHOUSE (1900)	NON-CONTRIBUTING
2714.000356	Building	66	BLDG 66/STAFF APTS. #2 (1929)	Contributing
2714.000340	Building	67	BLDG 67/INFIRMARY/BROOKSIDE (1929)	Contributing
2714.000341	Building	68	BLDG 68/STAFF APARTMENT #3 (1929)	Contributing
2714.000342	Building	69	BLDG 69/NURSES' HOME (1929)	Contributing
2714.000425	Building	70	BLDG 70/VALVE HOUSE (1910)	Contributing
2714.000426	Building	71	BLDG 71/HALFWAY HOUSE (1937)*	Contributing
2714.000427	Building	72	BLDG 72/REALITY HOUSE (1937)*	Contributing
2714.000100	Building	73	BLDG 73/LIBRARY (1910)	Contributing
2714.000433	Building	85	BLDG 85/TOOL SHED (1937)	NON-CONTRIBUTING
2714.000343	Building	86	BLDG 86/STAFF RESIDENCE (1926)	Contributing
2714.000434	Building	87	BLDG 87/GARAGE (1926)	NON-CONTRIBUTING
2714.000435	Building	88	BLDG 88/STORAGE (1937)	NON-CONTRIBUTING
2714.000436	Building	89	BLDG 89/GREENHOUSE (1940)	NON-CONTRIBUTING
2714.000437	Building	90	BLDG 90/GOLF CLUB (1941)	Contributing
2714.000438	Building	91	BLDG 91/GARAGE (1900)	NON-CONTRIBUTING
2714.000439	Building	94	BLDG 94/PAVILION (1941)	NON-CONTRIBUTING
2714.000440	Building	97	BLDG 97/GARAGE (1910)	NON-CONTRIBUTING
2714.000441	Building	98	BLDG 98/CHENEY BUILDING (1952)	NON-CONTRIBUTING
2714.000442	Building	99	BLDG 99/AUTO REPAIR SHOP (1930)	NON-CONTRIBUTING
2714.000443	Building	100	BLDG 100/GAS METER HOUSE (1955)	NON-CONTRIBUTING
2714.000444	Building	108	BLDG 108/GARAGE (1938)	NON-CONTRIBUTING
2714.000445	Building	108	BLDG 108/VALVE HOUSE (1860) - LOCATION UNKNOWN.	Contributing
2714.000446	Building	109	BLDG 109/TOOL SHED (1957)	NON-CONTRIBUTING
2714.000344	Building	110	BLDG 110/STORAGE (1922)	Contributing
2714.000447	Building	113	BLDG 113/STAFF BUILDING #16 (1966)	Contributing
2714.000448	Building	114	BLDG 114/STAFF BUILDING #17 (1966)	Contributing
2714.000096	Building	133	BLDG 133/STAFF COTTAGE #2 (1929)*	Contributing
2714.000453	Building	136	BLDG 136/STAFF GARAGE (1947)*	NON-CONTRIBUTING
2714.000454	Building	138	BLDG 138/GARAGE (1947)*	NON-CONTRIBUTING
2714.000457	Building	145	BLDG 145/GARAGE (1945)	NON-CONTRIBUTING
2714.000458	Building	147	BLDG 147/STAFF BUILDING 5 (1954)N	NON-CONTRIBUTING
2714.000459	Building	148	BLDG 148/STAFF BUILDING 6 (1954)N	NON-CONTRIBUTING
2714.000460	Building	149	BLDG 149/STAFF BLDG 7 (1954)	NON-CONTRIBUTING
2714.000463	Building	152	BLDG 152/GREENHOUSE (1867)	Contributing
2714.000464	Building	153	BLDG 153/GARAGE (1960)	NON-CONTRIBUTING
2714.000465	Building	154	BLDG 154/TOOL SHED (1937)	NON-CONTRIBUTING

2714.000466	Building	155	BLDG 155/GARAGE (1960)	NON-CONTRIBUTING
2714.000474	Building	164	BLDG 164/GARAGE (1901)	Contributing
2714.000345	Building	166	BLDG 166/OLD POLICE STATION (1932)	Contributing
2714.000475	Building	169	BLDG 169/GARAGE (1920)	NON-CONTRIBUTING
2714.000476	Building	170	BLDG 170/TOOL HOUSE (1927)	NON-CONTRIBUTING
2714.000477	Building	171	BLDG 171/SAND SHED (1962)	NON-CONTRIBUTING
2714.000479	Building	173	BLDG 173/STORAGE SHED (1962)	NON-CONTRIBUTING
2714.000480	Building	175	BLDG 175/STORAGE BLDG (1950)	NON-CONTRIBUTING
2714.000478	Building	182	BLDG 172/GROUNDS DEPT OFC (1962)*	NON-CONTRIBUTING

<sup>\*</sup>Building not found on survey map