

August 10, 2021

Village of Chester Planning Board
47 Main Street
Chester NY 10918

Re: Public Hearing: 62 Main Street

To Planning Board members:

This letter is being submitted for the public hearing on the proposed demolition of the existing church at 62 Main Street and the construction of a new church on site. The Preservation Collective is a non-profit organization that supports the public interest in seeing the protection of the scenic, historic and natural resources from the negative impacts of new development. The information and educational resources we provide are intended to help in your decision making process and to raise awareness about areas of public concern.

At the in-person hearing, several residents made heartfelt comments expressing their connection to the old church and their pride in the historic character of their community. The consensus was that the current design of the new structure did not compliment the downtown area and preservation efforts of existing structure were questioned. It was also suggested that a different location for the new structure, as designed, might be more appropriate. According to the Orange County real property database, there is an approved plan in the Town of Chester for the Hudson Valley Korean Methodist Church at 14 Old St Rte 17 (3-1-21.22). Are these different congregations and proposals?

We recognize that the project applicant is in good standing with the community and has designed a new structure to replace the existing church that is nearly 150 years old. It is also apparent that they have taken the responsibility of owning a part of Village history, which includes the maintenance that comes along with it since their purchase. We would like to know if there is documentation on the current condition that supports demolition and/or an estimated cost analysis to restore as part of the application. Additionally, we are not aware if grant opportunities have been explored in efforts to save the historic church in its entirety, or salvage in part and/or build a new extension on existing structure as an alternative to complete destruction.

There has been a growing concern in the delay of the Village adopting their Comprehensive Plan and following up said Plan with the expert recommendations in zoning determinations and ordinances. These actions are needed so the Planning Board has the best guidance to aid in their decision making role, however, I also mentioned at the in-person hearing, SEQR is grounds for denying an application in some cases, even if there is no applicable code or ordinance that applies. When making the SEQR determination of significance, the lead agency must consider “the impairment of the character or quality of important historical, archeological, architectural, or aesthetic resources or of existing community or neighborhood character” **6 NYCRR Sec. 617.7(c)(1)(v)**. Note that this section does not necessarily require that the area or structure be listed or eligible for listing on the National Register of Historic Places. Of course, it is clear that the community has created a vision with the Comprehensive Plan draft to see efforts made in preserving the integrity of the Village’s historic building stock. We hope that the applicant along with public officials and their consultants can work towards a resolution that in some way preserves the history of the Village.

If the demolition plans and new construction proceed, we have some additional comments as follows:

Historical Documentation – We hope there will be a cultural survey or some sort of documentary evidence (interior pictures) conducted and/or provided to the Chester Historical Society. In addition perhaps an historical plaque and/or educational kiosk detailing what was once built at that location so Village history can be shared and not lost on future generations.

Stormwater management – The erosion and sediment control plan appears to be adequate based on the scope of the project (i.e. silt fence and hay bales). The project will likely improve overall drainage through installation of the swale, trench drain at the end of the driveway along main, and controlled discharge of rooftop runoff. Perhaps the trench drain and rooftop runoff collection pipes and flared end sections were added in response to concerns regarding drainage, since they are certainly improvements.

Site Plan Notes – There are several items noted to be removed during construction and re-used (plants, slate, etc.). The existing bell on site is not mentioned but is in close proximity to pavement work improvements. We assume it will be preserved during construction and to remain on site. We have received inquiries what, if any, interior furniture and windows are to be salvaged as well. We are aware of interested parties for any materials that can be donated or available for purchase for preservation.

Disposal of material – One potential concern regarding the materials of older buildings is if there is any lead based paint on the exterior or interior of the building. Demolition can create dust, including dust containing lead-paint particles. This would be a concern inhalation-exposure for the workers and potentially adjacent property owners if dust is spread by the wind. For greater details on potential hazards and mitigation measures, I refer you to the following EPA website: <https://www.epa.gov/large-scale-residential-demolition/lead-based-paint-and-demolition> Based on a review of Google Maps images and street views, the building appears to be primarily made of wood with some stone masonry as well. If so, then is it unlikely to contain hazardous materials requiring special safeguards or disposal requirements?

Lighting - New lighting technology can create problems of excessive glare. If not already considered with Village guidelines, we propose following the Town of Chester's new lighting code including "*All non-essential lighting shall be designed to be turned off after business hours, leaving only the necessary lighting for site security, which shall be reduced to the minimal intensity level necessary. Non-essential can apply to display, aesthetic, parking and sign lighting. Motion-sensor security lighting is recommended to promote safety and reduce the amount of night lighting in the Town as determined by the Planning Board.*" See link: [Recently Adopted Local Laws | The Town of Chester, Orange County New York \(chester-ny.gov\)](#).

Additional Resources – below are some available links that can assist in deliberations on the project application:

- Simplify the Code. Speaker Randall Arendt; an expert on the topic of preservation of rural land and neighborhood character and well known for Conservation Subdivision Design. This webinar shows many real life examples of new construction designs blending into existing streetscapes including the Town of Warwick.
<https://www.youtube.com/watch?v=-xQwFGEkWhA>
- The NYS-DEC SEQR handbook document is also helpful in navigating the review process for example, see page 188 on archeological and historic resources:
https://www.dec.ny.gov/docs/permits_ej_operations_pdf/seqrhandbook.pdf.

- Village of Chester Draft Comprehensive Plan. [Village of Chester Comprehensive Plan – Village of Chester New York \(villageofchesterny.org\)](http://villageofchesterny.org). Several pages are devoted to the topic of historic preservation. There is also a picture of the church in question as an example as shown below:

- What is historic preservation? “Historic preservation is a conversation with our past about our future. It provides us with opportunities to ask, "What is important in our history?" and "What parts of our past can we preserve for the future?" see more: <https://www.nps.gov/subjects/historicpreservation/index.htm>
- New York's State Historic Preservation Office (SHPO) helps communities identify, evaluate, preserve, and revitalize their historic, archeological, and cultural resources. See more: <https://parks.ny.gov/shpo/>

We hope you take the time to review the information provided in this letter and that it proves useful in your decision making process with this application as well as future projects relating to areas of historical significance. There is a need to protect these environments, as best as possible, because they symbolize an important stage in the development in the history of the Village. Benefits from preservation of historical properties includes heritage tourism and community revitalization.

Thank you for your attention.

Sincerely,

 Tracy Schuh
 President
 TPC, Inc.

Cc: Village Board of Trustees