

United States Department of the Interior  
National Park Service



# National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in National Register Bulletin, *How to Complete the National Register of Historic Places Registration Form*. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions. **Place additional certification comments, entries, and narrative items on continuation sheets if needed (NPS Form 10-900a).**

### 1. Name of Property

historic name Ashokan Field Campus Historic District

other names/site number New Paltz College Camp, The Ashokan Center

### 2. Location

street & number 477 Beaverkill Road

not for publication

city or town Olive Bridge

vicinity

state New York code NY county Ulster code 111 zip code 12461

### 3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended,

I hereby certify that this  nomination  request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

In my opinion, the property  meets  does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:

national  statewide  local

R. Daniel Murphy  
Signature of certifying official/Title

2-9-2019  
Date

DS4PO  
State or Federal agency/bureau or Tribal Government

In my opinion, the property  meets  does not meet the National Register criteria.

\_\_\_\_\_  
Signature of commenting official Date

\_\_\_\_\_  
Title State or Federal agency/bureau or Tribal Government

### 4. National Park Service Certification

I hereby certify that this property is:

entered in the National Register  determined eligible for the National Register

determined not eligible for the National Register  removed from the National Register

other (explain:)

[Signature]  
Signature of the Keeper

2/16/2019  
Date of Action

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**5. Classification**

**Ownership of Property**  
 (Check as many boxes as apply.)

**Category of Property**  
 (Check only **one** box.)

**Number of Resources within Property**  
 (Do not include previously listed resources in the count.)

<input checked="" type="checkbox"/>	private
<input checked="" type="checkbox"/>	public - Local
<input type="checkbox"/>	public - State
<input type="checkbox"/>	public - Federal

<input type="checkbox"/>	building(s)
<input checked="" type="checkbox"/>	district
<input type="checkbox"/>	site
<input type="checkbox"/>	structure
<input type="checkbox"/>	object

Contributing	Noncontributing	
12	13	buildings
2	0	sites
3	1	structures
0	0	objects
17	14	<b>Total</b>

**Name of related multiple property listing**  
 (Enter "N/A" if property is not part of a multiple property listing)

**Number of contributing resources previously listed in the National Register**

N/A

1

**6. Function or Use**

**Historic Functions**

(Enter categories from instructions.)

DOMESTIC, single dwelling

DOMESTIC, camp

RECREATION & CULTURE, outdoor recreation

INDUSTRY, manufacturing facility

TRANSPORTATION, road related

**Current Functions**

(Enter categories from instructions.)

DOMESTIC, camp

RECREATION & CULTURE, outdoor recreation

LANDSCAPE, conservation area

**7. Description**

**Architectural Classification**

(Enter categories from instructions.)

EARLY 20<sup>TH</sup> C. REVIVALS, Colonial Revival

**Materials**

(Enter categories from instructions.)

foundation: STONE

walls: WOOD

roof: ASPHALT

other: \_\_\_\_\_



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**Narrative Description**

(Describe the historic and current physical appearance of the property. Explain contributing and noncontributing resources if necessary. Begin with a **summary paragraph** that briefly describes the general characteristics of the property, such as its location, setting, size, and significant features.)

**Summary Paragraph**

The Ashokan Field Campus Historic District functions as a multi-component environmental camp and retreat center (Ashokan Center) in the Town of Olive, Ulster County, New York. The Ashokan Center runs outdoor education programs for schools and cultural events for adults and families on approximately 360 acres on the Esopus Creek just downstream from the Ashokan Dam and reservoir of the New York City Bureau of Water Supply (Figs. 1-3). These 360 acres are composed of three parcels of high ground owned by the Ashokan Foundation, a small privately-held inholding, and one owned by the New York City Department of Environmental Protection which includes the banks of Esopus Creek. Most of the property is second-growth forest containing remnants of farm settlements: roads, house sites, stone walls, small bluestone quarries, hillside log chutes and meadows.

The Ashokan Field Campus Historic District is composed of historic features from four distinct eras. The first era is the longest, representing the development of a farm and mill site from 1731, when Jacobus Bush acquired a tract of unknown extent from the Town of Marbletown, of which it then was a part, through the period of the Winchell family ownership, 1785 to 1857. The second era centers on the redevelopment of the industrial site for use as a pulp mill, which functioned until 1914. The farm was owned by a series of short-term owners during this time. A brief third era occurred when Lester A. and Barbara L. Moehring purchased the farm in 1932 and initiated plans to create a country retreat centered in the historic house, which they renovated with the help of Kingston architect Myron S. Teller. With its purchase in 1957 by the New York State Teacher's College at New Paltz, the property entered its fourth and current phase as a camp for outdoor education. The district boundary was drawn to encompass the parcels assembled in 1957 for the creation of the Ashokan Field Campus.

The Esopus Creek forms the spine of the district and has been the focal point of its development. The natural falls here were targeted for industrial use early in the 18<sup>th</sup> century; this function evolved into the early 20<sup>th</sup> century, when the Esopus became the principal source of drinking water for New York City. At this point, the Esopus watershed became a conservation area. The west bank of the creek rises steeply to a high plateau. During the 1800s, the area was cleared for farm settlements and the harvesting of trees for wood products, much of it directed to saw and pulp mills at Winchell's Falls. Evidence of this cultural activity remains in a system of roads, stone walled clearings, bluestone quarry sites, log chutes and at least one preserved farmstead. Over the past century, since the last pulp mill was shut down, when the Ashokan Reservoir diminished the stream's power potential, the west side has reforested and its trails and natural and cultural features used for recreation and outdoor education.

The Winchell Farm occupies a lower plateau on the east side of the Esopus Creek with its house and barn at the end of a lane leading west from Beaverkill Road. From the farmstead, the lane leads down a steep decline to the mill site located on the east side of the creek where a natural fall of water is increased by a masonry dam. Agricultural land extends both north and south of the house and farmyard; some open space has been reclaimed by forest. A road runs along the western edge of the plateau, as the topography inclines gradually from south to north; a stone cellar hole on this route indicates the existence of other early buildings in this section. Although the farm exists now as part of a camp setting, its landscape features are still discernible in

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the topography and plan of open space. The Winchell property did not extend to the west side of the Esopus, which was owned by others; the two sections were combined when the camp was established in the 20<sup>th</sup> century.

**Narrative Description**

The camp buildings occupy what had been Lemuel Winchell's farm on the east side of the Esopus. Winchell's two-story wood frame house, built ca. 1785, survives and reputedly functioned as an inn; it represents the oldest use of the property. The old building was renovated as a country house in 1937 by the Kingston architectural firm Teller & Halverson. Lemuel Winchell also developed an industrial site on a waterfall named for him which, at its fullest extent in the early-19<sup>th</sup> century, had grist, saw and fulling mills, a forge and a store. None of these features are in evidence, having been replaced by a large wood pulp mill in 1887. The mill now exists as a picturesque ruin.

When Winchell's farm was sold to the State University Teacher's College at New Paltz (now SUNY New Paltz) in 1957 it was used first as a recreational camp for students and faculty and later for the outdoor education of schoolchildren and teacher training. A beach for swimming and boating, a playing field and bunkhouses were constructed on the Esopus at the north end of the farm clearing. The plateau south of the playing field and north of the Winchell house gradually developed into a craft village with blacksmith, glass, pewter, tin, broom and print shops and a one-room schoolhouse to introduce modern schoolchildren to old-time occupations. The print shop and schoolhouse are historic buildings moved to the site and, while it appears that other authentic shops had been sought, the remaining buildings were constructed using historic methods and appearances. An extant barn was revitalized for lessons in animal husbandry and other farm buildings were added around it.

A trail system was created in the woods on the west side of the creek, using many of the abandoned roads there, with access provided by a historic wood-truss covered bridge saved from another reservoir project in the Catskills. (The Turnwood Covered Bridge has been individually listed on the National Register.) Three campsites were created, a log dwelling rebuilt after a fire, and a second log cottage constructed. A hillside log chute was made into a ski slope and the recreational and educational program was spread through the forest. In 2012 the New York City Bureau of Water Supply increased water releases from the Ashokan Reservoir into the Esopus Creek. This action put the low-lying site containing the bunk houses in jeopardy. The old, outmoded bunkhouses were demolished and replaced with four new buildings higher up on the plateau north of the farm and craft village.

Buildings, structures and sites associated with each of the property's various eras and uses are extant on the property, all of which have been incorporated into the Ashokan Center and its activities. Those features are tabulated below, after which more detailed descriptions follow.

Site No.	Name of Feature	Construction Date	Property Type	Status	Photo No.
1	Winchell-Moehring House	ca. 1785, 1937	Building	Contributing	1-8, 10, 15
2	Wellhouse	ca. 1937	Building	Contributing	2
3	Moehring Barn	ca. 1785, 1935	Building	Contributing	9-10
4	Wagon Shed	ca. 1970	Building	Contributing	11-12
5	Granary	ca. 1970	Building	Contributing	13, 15

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6	Smokehouse	ca. 1970	Building	Contributing	14-15
7	Hillside Amphitheater & Outdoor Stage	2012	Structure	Non-contributing	14-15
8	Winchell's Falls & Hudson River Pulp & Paper Mfg. Co. Dam and Mill Site	1731-1914	Site	Contributing	16-18
9	Ashokan – Turnwood Covered Bridge	ca. 1885 moved 1939	Structure	Not counted NR listed 2000	19-20
10	Stone Schoolhouse	ca. 1817 moved 1985	Building	Non-contributing (age)	21-22
11	Garden Shed	ca. 1980	Building	Non-contributing (age)	23
12	Maple Sugar Shack	ca. 1980	Building	Non-contributing (age)	23
13	Pewter Shop	ca. 1970	Building	Contributing	23-24
14	Print Shop	ca. 1890 moved ca.1970	Building	Contributing	24
15	Privy	ca. 1900 moved 1980	Building	Non-contributing (age)	25
16	Tin & Broom Shops	ca. 1980	Building	Non-contributing (age)	26
17	Comfort Station	ca. 1980	Building	Non-contributing (age)	27
18	Glass & Blacksmith Shops	ca. 1970	Building	Contributing	28-29
19	Old Foundation	19 <sup>th</sup> century	Structure	Contributing	30
20	Playing Field	ca. 1957	N/A	Not Counted	31
21	Comfort Station	2016	Building	Non-contributing (age)	31
22	Picnic Pavilion	ca. 1970	Structure	Contributing	31-32
23	Beach	ca. 1957	N/A	Not Counted	33
24	Sauna & Equipment Shed	ca. 1957	Building	Contributing	33
25	Wiggly Bridge	ca. 1957	Structure	Contributing	34
26	Site of Old Bunkhouses	ca. 1957	N/A	Not Counted	35
27	The Homestead Homestead outbuilding ruins	ca. 1980 ca. 1850	Building Site	Non-contrib (age) Contributing	36-37
28	Writer's Cabin	ca. 1980	Building	Non-contributing (age)	38
29	Campsite	ca. 1960	Buildings (2)	Contributing	39
30	New Bunkhouse I	2013	Building	Non-contributing (age)	43
31	New Bunkhouse II	2013	Building	Non-contributing (age)	43
32	New Bunkhouse III	2013	Building	Non-contributing (age)	44
33	New Bunkhouse IV & Dining Hall	2013	Building	Non-contributing (age)	45

1. Winchell – Moehring House, ca. 1785, ca. 1937, 1 contributing building, PHOTOS 1-8.

The large two-story wood frame house with a gable roof reputedly includes the stone foundation of the early-18<sup>th</sup>-century dwelling of Jacobus Bush, the first landowner. The stone basement is exposed at grade on the southerly front side creating an imposing three-story front with a five-bay, center-entrance façade and a two-story porch (PHOTO 1). This form is consistent with roadside inns built in the era, which is believed to have been a function of the building. An undated photograph shows this side of the house with asymmetrical fenestration on the first story: an entrance and adjoining window in the center, flanked by two windows on the east side and one on the west side, and windows evenly



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spaced across the second story; two windows occupy each of two stories and the attic level on the easterly gable end (Fig.5). The current five-bay, center-entrance façade was created in the ca. 1937 “restoration” designed by Kingston architects Teller & Halverson, and the attic windows on the east end were replaced with the existing quarter-round Colonial lights. The historic photograph depicts small chimneys indicating original fireplaces had been replaced with stoves. During the 20<sup>th</sup>-century renovation fireplaces were rebuilt on both ends of the first floor with the stone back of the one on the west gable end exposed on the exterior, imitating a regional practice but one unprecedented in this building.

Existing condition drawings made in 1937 document there was a similar arrangement of openings on the north side, an imbalance indicating the separation of private and public spaces on the interior typical of 19<sup>th</sup>-century inns. Yet, the north façade was made bilaterally symmetrical like the opposite façade in the 20<sup>th</sup>-century remodeling, only with a fifth window added east of the doorway to illuminate a bathroom (PHOTO 2). Based on Teller & Halverson’s surviving plans, the current one-story service wing on the west end of the building is an addition nearly doubling the dimensions of a previous one, to which a small annex is attached at a lower level (PHOTOS 2&3). Plan drawings indicate that interior spaces were reconfigured and refinished in a Colonial Revival manner with bathrooms and other modern conveniences added in ca. 1937. A Federal-style wood mantelpiece was fabricated for the added fireplace in the living room on the east end, which combined what had been two rooms, and beams and boards were added to the ceiling (PHOTOS 4&5). A less formal room was created at the west end of the plan with a fireplace, wood mantel and knotty pine paneling—a favorite of the architect, since painted (PHOTO 6). New doors, windows and millwork were installed throughout; a center stair with a mid-19<sup>th</sup>-century balustrade was one of the few older components preserved (PHOTOS 7&8).

New clapboards with beaded edges, attached with faux rose-head nails, unified changes made to the exterior fenestration. Wider, rougher weatherboards covering the north façade of the main house were added still later. A bluestone terrace on the north side of the house also dates to ca. 1937, patterned around small round grind stones from the abandoned pulp mill nearby (PHOTO 2). The location of a wellhouse with a stone base, lattice walls and a gable roof just outside the kitchen suggests it was built on an earlier site. The paving wraps around the east end of the house and terminates at the upper-story of the south porch and stairs with bluestone retaining walls leading down to the basement level (PHOTO 1). When the college created the camp in 1957, the house was used as a retreat for the president and a conference center; later it became a dormitory for camp staff, a function in which it currently serves. Few changes have been made to the 1937 plan and design. A metal roof was added in 2015. The house is the oldest building on the property and has been in continuous use since the 18<sup>th</sup> century. It is intact to its 1937 restoration period and is a contributing feature.

2. Wellhouse, ca. 1937, 1 contributing building, PHOTO 2

The wellhouse is a one-bay by one-bay building with a front-gabled roof and a square stone foundation. Above the foundation, the wellhouse is covered in lattice and has vertical boards in the gable.

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3. Moehring Barn, ca. 1937, 1 contributing building, PHOTOS 9 & 10.

The barn is a low, one-story, four-bay by six-bay building with a sawn wood frame and a gable roof that was built by the Moehrings in ca. 1937. It is set on a stone basement exposed at grade on the west side that may be a remnant of an earlier barn. The basement contains stables for horses formerly part of the college's recreational camp program. The camp's first blacksmith forge was constructed in the north end of the basement and is still used for educational purposes. A 19<sup>th</sup>-century shop façade salvaged from Urban Renewal demolitions in the Rondout section of Kingston was installed in a partition in another part of the basement. The main floor of the one-story barn is undivided and functioned for hay and feed storage; it currently functions as a storage facility. A metal roof was added in 2015 and solar panels installed in 2017. The barn is the centerpiece of a farmyard compound developed by the camp in the 1970s to create a traditional farm setting and provide campers with knowledge of agricultural history.

4. Wagon Shed, ca. 1970, 1 contributing building, PHOTOS 11 – 12, 15.

The one-story, four-bay by one-bay open-front storage building was constructed ca. 1970 by camp staff with a joined timber frame inspired by drawings in artist Eric Sloan's books on old-time buildings. The wagon shed was carefully crafted to make the farmyard appear authentic to the 19<sup>th</sup> century for the campers' experience. It also serves as a shelter for the camp's collection of historic farm equipment.

5. Granary, ca. 1970, 1 contributing building, PHOTOS 13 & 15.

The one-story, one-bay by one-bay wood frame, gable-roof farm building, elevated above the ground on concrete piers, was built ca. 1970 by camp staff following traditional models to develop a farmyard with buildings typical of 19<sup>th</sup>-century period.

6. Smokehouse, ca. 1970, 1 contributing building, PHOTOS 14-15.

The one-story, one-bay by one-bay wood frame, gable roof farm building, mounted on a bluestone foundation, was built ca. 1970 by camp staff following traditional models to develop a homestead with buildings typical of 19<sup>th</sup>-century period.

7. Hillside Amphitheater & Outdoor Stage, ca. 2012, 1 non-contributing structure due to age, PHOTOS 14-15.

Former farm pasture mowed and adapted for use as audience area for performances occurring on open wood frame stage with a shed roof.

8. Winchell's Falls & Hudson River Pulp & Paper Mfg. Co. Dam and Mill Site, ca. 1731-1914, 1 contributing site, PHOTOS 16-18.

This industrial site, with a history going back to the early 18<sup>th</sup> century, is composed of a natural waterfall increased in head by a masonry dam, the remains of buildings and hydropower structures representing the stages of development of the site from the grist, saw and fulling mills and iron forge operating in the 18<sup>th</sup> and 19<sup>th</sup> centuries to a wood pulp mill introduced in the 20<sup>th</sup> century. Visible remains include stone foundations, extant sections of the 20<sup>th</sup>-century dam, and earth works creek-side, and stone foundations and pylons that supported structures on the plateau above. The site clearly has archeological potential.

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9. Ashokan – Turnwood Covered Bridge, 1885, moved to site 1939, individually listed on the National Register, contributing but not counted, PHOTOS 19-20.  
The single span plank-truss timber bridge covered with a gable roof was built to span the Beaverkill Creek in the Town of Hardenbergh, Ulster County by Nelson Tompkins in 1885. The bridge is 72 ft, 6 in. long and 16 ft. 4 in. wide with a portal 11 ft. 10 in. high and 13 ft. 1 in. wide. The bridge was judged unsafe for vehicular traffic in 1938 and replaced with a new steel span. The wood bridge was bought at public auction by Lester A. Moehring in 1939 who had a crew dismantle it and re-erect it on stone abutments to cross the Esopus Creek on his property. It is one of ten examples of the Patented Town lattice-truss design remaining in New York when listed on the National Register in 2000. The floor structure was repaired and new board walls and metal roof added in 2016. The stone abutments were reinforced with concrete and a causeway with three wide culverts constructed on the east side of the bridge to accommodate the increased flow from periodic reservoir water releases.
10. Stone Schoolhouse, ca. 1817, moved to site 1985, 1 non-contributing building as move postdates period of significance, PHOTOS 21-22.  
The one-story, two-bay by two-bay stone building with a gable roof was constructed for the Shokan school from 1817 to 1842, after which it functioned as a cooper shop and a dwelling. It had been abandoned for most of the 20<sup>th</sup> century when it was given to the Ashokan Camp and staff dismantled it and reconstructed it on its present site in 1985. The school does not appear to be individually eligible on its own merit.
11. Garden Shed, ca. 1980, 1 non-contributing building due to age, PHOTO 23.  
One-story, one-bay by one-bay wood frame shed approximately 4x4 ft. in plan; gable roof; door on north end.
12. Maple Sugar Shack, ca. 1980, 1 non-contributing building due to age, PHOTO 23.  
One-story, two-bay by one-bay wood frame outbuilding with shed roof and deep open work space tucked under an opposite shed roof, such that it forms a gable overall. Entrance flanked by windows on west side with single windows on north and south ends.
13. Pewter Shop, ca. 1970, 1 contributing building, PHOTOS 23 & 24.  
Story-and-a-half, two-bay by three-bay wood frame trade building with front-gable roof constructed ca. 1970 by camp staff containing a large classroom space with a brick fireplace at one end and a small studio behind. The exterior is covered with wood clapboards and an entrance centered in a gabled front façade on the southerly end.
14. Print Shop, ca. 1890, moved ca. 1970, 1 contributing building, PHOTO 24.  
One-story, one-bay by one-bay wood frame commercial building with a flat roof, wood clapboard siding, display windows and center entrance. It was built for a law office in Tillson, New York (near New Paltz) and was moved to site by camp staff in ca. 1970.



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15. Privy, ca. 1900, moved ca. 1980, 1 non-contributing building as move postdates period of significance, PHOTO 25.  
One-story, one-bay by one-bay wood frame gable roof building with two entrances into small rooms containing four-hole seats, two at a lower level for children. Moved from a nearby property on Beaverkill Road ca. 1980.
16. Tin and Broom Shops, ca. 1980, 1 non-contributing building due to age, PHOTO 26.  
One-story, seven-bay by two-bay wood frame building with two front-gable sections joined by a gable hyphen containing two identical workshop spaces for traditional craft education.
17. Comfort Station, ca. 1980, 1 non-contributing building due to age, PHOTO 27.  
One-story, three-bay by two-bay wood frame, gable roof building with front façade spanned by deep porch sheltering separate entrances into boy's and girl's toilets.
18. Glass Shop / Blacksmith Shop, ca. 1970, 1 contributing building, PHOTOS 28-29.  
One-story, two-bay by five-bay wood frame shop building with front gable roof constructed ca. 1970 by camp staff. Wood clapboard siding is unpainted. The interior contains one large classroom with a forge at one end, with an office space behind. The front-gable façade contains a central entrance and porch.
19. Old Foundation, 19<sup>th</sup> century, 1 contributing site, PHOTO 30.  
Cellar hole for an unknown building with stone walls on four sides believed to be associated with Lemuel Winchell. The site has been partially disturbed by amateur excavations by campers over the years, but may retain some archaeological potential.
20. Playing Field, ca. 1957, not counted, PHOTO 31.  
Open, mowed field for active recreation on a low plateau above flood plain of creek. While this area relates to the history and use of the camp, it is not a constructed feature and is not counted.
21. Comfort Station, 2016, 1 non-contributing building due to age, PHOTO 31.  
One-story, one-bay by two-bay wood frame gable roof building with male and female toilets.
22. Picnic Pavilion, ca. 1970, 1 contributing structure, PHOTOS 31-32.  
Open sided wood-frame structure with a concrete pad and metal gable roof.
23. Beach, ca. 1957, not counted, PHOTO 33.  
Sandy shoreline area with water access created for swimming, boating and canoeing. While this area relates to the history and use of the camp, it is not a constructed feature and is not counted.
24. Sauna, ca. 1957, 1 contributing building, PHOTO 33.  
One-story, two-bay by two-bay wood frame gable-roof building containing a sauna. Small woodshed (not counted) is adjacent.

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25. “Wiggly Bridge,” ca. 1957, 1 contributing structure, PHOTO 34.  
Suspension foot bridge connecting Beach and Playing Field areas with island where original bunkhouses were located until demolished in 2012. Was used by campers to get back-and-forth from bunkhouses to rest of camp.
26. Site of Old Bunkhouses, 1957-2012, not counted, PHOTO 35.  
Island area partially wooded with clearing where original bunkhouses were removed. Changes in program of water releases from reservoir made this site vulnerable to flooding. While this area relates to the history and use of the camp, it is not a constructed feature and is not counted.
27. “The Homestead,” ca. 1980, 1 non-contributing building due to age, and Homestead Outbuilding Site, ca. 1850, 1 contributing site PHOTOS 36-37.  
Story-and-a-half, two-bay by one-bay log dwelling with a gable roof copying and constructed on foundation of a 19<sup>th</sup>-century building that had been destroyed by fire salvaging some intact parts, including stone fireplace and chimney. Significant representation of a once-common but vanished house type. A stone barn foundation, wood frame milkhouse and a wood frame privy in near-ruinous conditions are located in the vicinity of the log dwelling and represent a site contributing to the significance of the property.
28. “Writers Cabin,” ca. 1980, 1 non-contributing building due to age, PHOTO 38.  
One-story, one-bay by one-bay front-gabled one-room log building with deep front porch.
29. Campsite, ca. 1960, 2 contributing buildings, PHOTO 39.  
Clearing in woods containing two lean-to wood frame shelters. Each lean-to is a two-bay by one-bay side-gabled building with an open front.
30. New Bunkhouse I, 2013, 1 non-contributing building due to age, PHOTO 43.  
Two-story wood frame dormitory building composed of two identical sections joined by a hyphen containing entrance; entrance porch constructed with tree-trunk posts. has four window bays, first-story clad with flush vertical wood boards, second story with wood board-and-batten siding. Building embanked with only second story exposed on rear. Metal roof covered with solar panels. Designed by New Paltz architect Matthew Bialecki in picturesque rustic style.
31. New Bunkhouse II, 2013, 1 non-contributing building due to age, PHOTO 43.  
Two-story, wood frame dormitory building with wood board-and-batten siding, gable roof and central cross-gable pavilion centered on front façade; one-bay gabled façade with first-story entrance fronted by porch with tree-trunk posts and surmounted by second-story window and attic lozenge. Side cross-wings contain triple windows on first story and double windows on second story. Building embanked with only second story exposed on rear. Metal roof. Designed by New Paltz architect Matthew Bialecki in picturesque rustic style.
32. New Bunkhouse III, 2013, 1 non-contributing building due to age, PHOTO 44.  
Two-story wood frame dormitory building with gable roof and easterly end embanked in hillside. Southerly façade has irregular fenestration containing central passageway surmounted by wall dormer and cupola on roof ridge. Northerly side nearly identical. Metal roof with solar panels. One-story office

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wing attached to westerly end with porch constructed with tree-trunk posts. Designed by New Paltz architect Matthew Bialecki in picturesque rustic style.

33. New Bunkhouse & Dining Hall, 2013, 1 non-contributing building due to age, PHOTO 45.

Two-story wood frame mixed-use building with flush vertical wood board siding; embedded in hillside on easterly side. Irregular fenestration on principal, westerly façade; one-story dining hall wing with cross-gable roof. Porches with tree-trunk posts on westerly facades of both sections. Metal roof with solar panels. Designed by New Paltz architect Matthew Bialecki in picturesque rustic style.



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**8. Statement of Significance**

**Applicable National Register Criteria**

(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing.)

- A Property is associated with events that have made a significant contribution to the broad patterns of our history.
- B Property is associated with the lives of persons significant in our past.
- C Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- D Property has yielded, or is likely to yield, information important in prehistory or history.

**Criteria Considerations**

(Mark "x" in all the boxes that apply.)

Property is:

- A Owned by a religious institution or used for religious purposes.
- B removed from its original location.
- C a birthplace or grave.
- D a cemetery.
- E a reconstructed building, object, or structure.
- F a commemorative property.
- G less than 50 years old or achieving significance within the past 50 years.

**Areas of Significance**

(Enter categories from instructions.)

ARCHITECTURE

EDUCATION

RECREATION

SETTLEMENT

INDUSTRY

**Period of Significance**

ca. 1785 – ca. 1970

**Significant Dates**

ca. 1785

ca. 1887

ca. 1937

1957

**Significant Person**

(Complete only if Criterion B is marked above.)

None

**Cultural Affiliation**

N/A

**Architect/Builder**

Teller & Halverson, architect, ca. 1937

**Period of Significance (justification)**

The Period of Significance was drawn to encompass the varied and evolving history of the property. It begins with Lemuel Winchell's ca. 1785 house, which may be located on earlier foundations, and extends until ca. 1970, when the majority of the buildings associated with the Ashokan Field Campus, a college-based outdoor education program, had been completed. The property has continued to function as a camp focused on the ecological and cultural history of the Catskills region to the present day.

**Criteria Considerations (explanation, if necessary) N/A**

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**Statement of Significance Summary Paragraph** (Provide a summary paragraph that includes level of significance and applicable criteria.)

The Ashokan Field Campus Historic District is significant under Criterion A in the areas of settlement, industry, education and recreation and Criterion C in the area of architecture for its illustration of several centuries of continued development on a large tract of land in the Catskill mountain region of New York State, beginning with the late 18<sup>th</sup>-century Winchell farm and the Winchell family's industrial development of Winchell Falls, followed by its use in the early 20<sup>th</sup>-century wood pulp manufacturing by several prominent companies, and finally by its mid-20<sup>th</sup> century redevelopment as a children's camp applying an early, innovative outdoor education program affiliated with a New York State Teacher's College. The development of the nominated district was influenced by the natural character of the site, which retains built and landscape features from each of these eras that reflect the areas of significance. The district's primary significance, at the statewide level under criterion A in the areas of recreation and education for its early and enduring role in the development of outdoor education in New York State, reflects its last period of development (1957–ca.1970). The district is locally significant in the areas of settlement and industry for its association with the early development and use of the property and in the area of architecture for its varied collection of buildings and structures representing its different historical eras and areas of significance. It includes one resource, the Ashokan-Turnwood Covered Bridge, which was previously listed on the National Register of Historic Places. The period of significance (ca. 1785–ca.1970) was drawn to encompass the property's long, rich, and varied history and to include all the significant resources associated with the themes represented.

In the areas of EDUCATION and RECREATION, the Ashokan Field Campus Historic District is significant at the state level for its association with the early development of curriculums for outdoor education within New York educational institutions at both the college level, where school teachers were trained, and in elementary schools, where the principles and techniques were applied. John Dewey's progressive educational philosophy emphasizing experiential learning was reinvigorated after the Second World War with a movement to expand classroom learning into the outdoors. By the mid-20<sup>th</sup> century, schoolchildren's interaction with the outside world of life and work had diminished. In addition to exposing them to tangible natural and cultural environments, proponents of outdoor education believed that the basic school subjects in many cases could be better learned outside of a traditional classroom setting. The core philosophy and practice of outdoor education included a general move toward increased outdoor recreational activity, a general reaction against existing classroom education practice, a desire for a greater role for pragmatism in education, the need for conservation education, the need to preserve and promote democratic ideology, an interest in experimenting with new approaches to education, and seeing the benefit of re-integrating schools with their communities. As a state teachers college with a campus school for student-teacher training, New Paltz college introduced outdoor education on the site soon after acquiring the property in 1957. While the property also functioned as a recreational and retreat facility for college faculty and students, the rationale for establishing the camp was to introduce the principles and methods of outdoor education into the college curriculum and provide a training ground for elementary students from the campus school. When New Paltz College President William J. Haggerty acquired the Ashokan property in 1957, he had been planning for it for a decade or more. He was inspired by other educational camps, such as Cooper Union's Green Education Camp in rural New Jersey, the Kellogg Foundation camps in Michigan, and the New York State Teacher's College at Cortland's camp at the

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Adirondack Great Camp Pine Knot, one of six state college-associated camps operating at that time.<sup>1</sup> Haggerty hired Merrill H. Archard, a graduate of both Cortland and Columbia University Teachers College, to develop a program in outdoor education, based on his doctoral dissertation, and proceeded to locate an appropriate natural setting for a “campsite.” Archard served as the camp administrator in addition to his other duties as vice-principal of the New Paltz Campus School. A full-time director with academic credentials in outdoor education was hired in 1965, which intensified the school program and introduced cultural history and traditional crafts to the curriculum. The camp continues to offer outdoor education programming based on this foundation.

Under criterion A, in the areas of SETTLEMENT and INDUSTRY the Ashokan Field Campus Historic District is significant at a local level. The history of the property begins with the SETTLEMENT of the area in 1731, when Jacobus Bush purchased the property from the Town of Marbletown. Life in the region was still characterized by open hostilities with Native Americans sustained into the Post-Revolutionary War era. The site was an important one in the neighborhood due to its location on a falls on the Esopus Creek, on which Jacobus Bush or his son and namesake established its first INDUSTRY. Local histories relate that the falls supported grist, saw and carding mills by the time Lemuel Winchell purchased the water privilege from the Bush family in 1785. Local histories locate a blacksmith shop at the falls during Winchell’s ownership. Late in the 19<sup>th</sup> century, the mills were converted to producing wood pulp as the tanning and forestry industries cleared the Catskills of its timber. This mill was expanded on a corporate level by the Hudson River Pulp & Paper Manufacturing Company, which purchased the Winchell’s Falls site in 1887 to produce pulp for making newsprint; this Adirondacks-based firm merged with others to create International Paper Company in 1898. The Eastern Dynamite Company took over the pulp mills on the Esopus in 1905. Formed by Eugene DuPont and others in 1895, the company continued to make wood pulp in which to suspend explosives in the manufacture of dynamite. Eastern Dynamite Company merged with the DuPont Corporation in 1912. Yet by this time, the Esopus Creek site had been vacated because the construction of the Ashokan Dam upstream had reduced the water flow significantly and to the detriment of the water-powered facility.

Under criterion C, at the local level in the area of ARCHITECTURE, the most important architectural resource in the district is the Winchell-Moehring House, a two-story wood frame building, an example of a prominent late 18<sup>th</sup>-century dwelling with commercial lodging functions. Embedded in a hillside, it incorporates its basement in a three-story front façade with a two-story porch, the latter being a characteristic feature of roadside inns of the period. Although its Federal-period form and general appearance are essentially intact, the house was extensively restored and “improved” in the 1930s for use as a country retreat for an automobile industry executive with local ties. Following plans provided by Teller & Halverson, a Kingston architectural firm specializing in the restoration of historic houses for second homes, the house was renovated in the Colonial Revival sensibility of the period, featuring a regional “Dutch” taste emphasizing ceiling beams, wide-board floors in natural finish, and modest white-painted interiors and exteriors. A service wing was added to one end and a bluestone terrace, embellished with grind stones from an abandoned pulp mill on the property, distinguished a new front façade created on the uphill side. Many of the features of this early 20th-century

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<sup>1</sup> SUNY New Paltz Special Collections, Merrill H. Archard to Dr. William J. Haggerty, 27 March 1956. Merrill H. Archard mentions he looked at the camps of six state colleges but only Cortland by name: “Enclosed is a table of principles which I would like to have you judge” for school camping, developed from literature and research in school camping field and from interviews with leaders of the six SUNY Teachers Colleges currently operating school camps, including at Cortland; “My plans call for the developing of recommendations for the establishment and administration of the proposed New Paltz State Teachers College school camp”



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reworking of the house survive even though the house has functioned as a dormitory for camp staff for the past 50 years.

No other buildings associated with the 18<sup>th</sup>- and 19<sup>th</sup>-century history of the property survive intact, other than a barn foundation that was incorporated into a new barn constructed during the Moehring occupancy. There had been other dams above Winchell's Falls before the current masonry dam was constructed at the turn of the 20<sup>th</sup> century for the pulp mill that functioned there until 1912. Stone foundations are visible in the vicinity associated with various stages of the industrial development of Winchell's Falls. Camp-related architecture includes three 19<sup>th</sup>-century buildings moved to the property in the late 20<sup>th</sup> century: a small wood-frame law office from Tillson, New York, a stone schoolhouse from the Town of Olive, and a privy from a nearby neighbor. In addition, new buildings were constructed to look historic and function as craft workshops for glassblowing, blacksmithing, tinsmithing, broom-making, and pewtering. Hand-crafted farm buildings, inspired by buildings documented by Eric Sloane in his books, were added to the barnyard at this time to create an authentic appearance and function. These buildings are significant in the context of the camp period of the property and the intent to create a historical village to provide students with an introduction to rural life and old-time crafts. Some of these buildings are less than fifty years old and fall outside the period of significance.

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Developmental history/additional historic context information (Provide at least **one** paragraph for each area of significance.)

The early history of the property, located on the Esopus Creek at what had been known as Winchell's Falls, has been traced back to a 1731 deed by which Jacobus Bush purchased the property from the Town of Marbletown. Portions of the stone basement of Bush's homestead, or that of his son and namesake who inherited the property in 1754, are believed to survive in the extant house, which Lemuel Winchell erected after acquiring the farm in 1785. Whereas the Bush family was well-established in the region, Winchell was a newcomer arriving from Dutchess County, where his family had migrated from New England. He selected the site for the industrial potential of the falls, which is believed to have supported a mill as early as 1772, as well as its location at a fording place on the creek. In addition to constructing a dam on the falls and operating grist, saw and carding mills, as well as a forge, blacksmith shop and store, Lemuel Winchell accommodated travelers in his house and tavern. He was a local leader, first as a school board member in the Town of Marbletown and then as a member of the first town board of the Town of Olive after it was separated from Marbletown in 1823. Winchell's house is the predominant surviving feature associated with his ownership, but there also may be foundation remains of his mills and early roads on the property.<sup>2</sup>

After Lemuel Winchell died in 1827, his son Lemuel continued to operate the farm and apparently manage his father's industrial and commercial pursuits until 1857 when he sold the property to John Gordon, an Irish immigrant who had been working in an area tannery. Gordon appears to have just farmed the land and, reputedly, taken in summer boarders. The mill site may have been abandoned at this point as there is no record of Gordon or the location in mid-19<sup>th</sup>-century census industry schedules, but by 1887 the water rights on the creek and, by one account, a wood pulp mill, had been acquired by the Hudson River Pulp and Paper Manufacturing Company. Based in Corinth, New York, on the upper Hudson River in the Adirondacks, this company was the largest producer of newsprint in the country and evidently branched out in other forested

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<sup>2</sup> Olivebridge NY, Ashokan Center Archives. Deed history. Also Vera Van Steenbergh Sickler, *Town of Olive Through the Years*, Vol. 1 (Kingston NY: Self-published, 1976).

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areas to create more wood pulp for its expanding paper-making operation. The old mill was destroyed by fire and rebuilt; a new dam and a second pulp mill were erected in 1895-1897. In 1898 the Hudson River Pulp & Paper Manufacturing Company became one of seventeen enterprises that combined to form the International Paper Company.<sup>3</sup>

The Eastern Dynamite Company took over the pulp mills on the Esopus in 1905. Formed by Eugene DuPont and others in 1895, the company utilized Alfred Nobel's patented 1867 invention to make the transition from explosives made with black powder to the less volatile dynamite. (To this point, the DuPonts had built their business on the manufacture of black powder.) Wood pulp was one medium in which the explosive materials in dynamite could be suspended, which apparently led to Eastern Dynamite Company's interest in the pulp mills at Winchell Falls. Eastern Dynamite Company merged with the DuPont Powder Company in 1912. Yet by this time, the site had been vacated because the construction of the Ashokan Dam (part of the New York City watershed system) upstream had reduced the flow of the Esopus Creek significantly. The Eastern Dynamite Company sued the New York City Bureau of Water Supply for damages. Stonework associated with the dam and pulp mills are still evident on the property; no intact buildings survive.

In 1924 E.I. DuPont de Nemours & Company, successor to the DuPont Powder Company, sold two parcels to Lester A. Moehring: a 1.70-acre lot with mills and 22.0 acres in the vicinity. This began a series of transactions by which Moehring assembled approximately 200 acres of property at Winchell's Falls. Ten years later, Moehring bought another 95 acres on the opposite (west) side of the creek from the Reservoir Holding Corporation. He purchased the 73 acres comprising what remained of the Winchell farm in 1937 from Henry J. and Matilda Wright, to whom John Gordon conveyed it in 1899. It was this parcel that contained the Winchell house. The fourth acquisition occurred in 1944 and added another 13.10 acres on the west side of the Esopus.<sup>4</sup>

Lester Ahrend Moehring (1892-1947) had been born in Brooklyn, to which his grandparents had immigrated from Germany. He was comptroller of the Chrysler Corporation in Detroit and lived in Grosse Point, Michigan. His wife, Barbara L. Darling, was a Kingston native and said to have been related to Lemuel Winchell. Barbara L. Darling (1886-1953) was the daughter of a Kingston masonry contractor, William W. Darling, Jr., and his wife, Ella. They married around 1920 and lived with Barbara's widowed mother in Kingston, where Lester was employed as an auditor in a boat yard. Sometime between 1925 and 1930 they relocated to Michigan.

The Moerhings restored and expanded the Winchell Inn with the guidance of Kingston architect Harry Halverson, partner of Myron S. Teller in what was by then Ulster County's leading historic house restoration firm.<sup>5</sup> Preliminary plans for alterations to the house, dated 1937, exist in the firm's archive, now owned by the Friends of Historic Kingston. Typical of the firm's work, the aging house was stabilized, accrued features removed and replaced with Colonial Revival replicas, and additions sensitively designed to introduce modern conveniences and genteel living spaces. The distinctive two-story tavern porch was preserved and bluestone terraces constructed around the periphery of the house incorporating grind-stones salvaged from the pulp mill.

<sup>3</sup> Corinth Museum and Hudson River Mill Historical Society, Hudson River Mill Project, <http://www.hudsonrivermillproject.org/index.htm>. Also Sickler, *Town of Olive Through the Years*, Vol. 1.

<sup>4</sup> Ulster County Deeds, 502:159, 2/24/1928, E.I. DuPont de Nemours & Co. to Lester A. Moehring and Barbara L.D. Moehring; 572:43, 5/15/1934, Reservoir Holding Corp. to Lester A Moehring; 589:123, 7/3/1937, Henry J. Wright & Matilda Wright to Lester A. Moehring; 646:173, 10/12/1944, Susan Bailey & Estate of Harris Bailey to Lester A. Moehring.

<sup>5</sup> William B. Rhoads, *Kingston, New York, The Architectural Guide* (Hensonville NY: Black Dome Press, 2003), 181-184.

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An extant barn in ruinous condition was replaced with another on its stone basement and other outbuildings constructed. Moerhing also moved a wood-truss covered bridge from Turnwood in the Catskills to the Esopus to connect the east and west sides of the property. It had been built in 1885 (builder's name and year are inscribed in the rafters). The bridge was listed on the State and National Historic Registers of Historic Places in 2000 for its engineering significance.

When her husband died in 1947, Barbara L. Moerhing moved to a smaller stone house at nearby Davis Corners, which she and her husband also had also restored to plans created by Teller & Halverson. Two years after her death, in 1955, the executor of her last will and testament, Edward W. Carpenter, sold the Winchell place to Frank V. Banks and Margaret J.R. Banks of Staten Island, New York.<sup>6</sup>

## THE OUTDOOR EDUCATION MOVEMENT AND THE CREATION OF THE ASHOKAN FIELD CAMPUS

In 1957 Dr. William Haggerty, president of the State University College at New Paltz, negotiated the purchase of the Winchell Falls property from the Banks family with the intention of creating a college camp for recreation and outdoor education for both college students and children attending the college's campus school. Initially called the New Paltz College Camp, the property later became known as the Ashokan Field Campus as the outdoor education program got underway. While the Ashokan Field Campus had its specific roots in New Paltz in the late 1940s, the ideas and movements that influenced its creation stem both from the Progressive education movement of the turn of the twentieth century and a revival of its principles in the outdoor education movement beginning in the late 1930s. The Ashokan Field Campus was not the first outdoor education center in the state or even within the State University of New York system; however, it was built more directly on the philosophy and practice of the relatively new field than others that existed before it.

William James Haggerty, who became the president of SUNY New Paltz in 1944, began work toward developing a "college campsite" in 1949, after having visited Cooper Union's Green Engineering Camp in New Jersey. Given to the school in 1940 and converted from a farm to an educational complex, Cooper Union used Green Engineering Camp for summer classes in engineering, surveying, and the arts, and school-year classes in surveying, landscape drawing, and painting.<sup>7</sup> Haggerty's own background in outdoor education is not entirely clear. He was the son of educator and college dean Melvin Everett Haggerty and a graduate of the University of Minnesota; he received his doctorate at the University of Chicago in 1943 and had been an assistant professor of education and director of personnel at the University of Connecticut at Storrs when he accepted the New Paltz presidency. But he was certainly aware of the outdoor education field by 1949, when he appointed a joint student-faculty committee to examine the need and possible sites for a college camp. In a 1951 letter to a potential land donor, Haggerty outlined four reasons for the college's quest for "a relatively large camp site containing water and undeveloped and unimproved forest land": to build interest in the "unspoiled" outdoors, to offer teaching and learning in outdoor education, to serve as a laboratory for the children in New Paltz's "demonstration elementary school" and the students preparing to be teachers, and to develop the outdoor education field as it had been in the states of Michigan and California.<sup>8</sup>

<sup>6</sup> Ulster County Deeds, 919:18, 2/18/1955, Edward W. Carpenter, executor, to Frank V. Banks and Margaret J.R. Banks; 998:11, 4/15/1957, Frank V. and Margaret J.R. Banks, Moorpark, California, to New Paltz College Association.

<sup>7</sup> Cooper Union Alumni Association website, <http://cooperalumni.org/green-camp-ringwood-and-norvin-green-state-forest/>.

<sup>8</sup> Wm J. Haggerty to Robert Colgate, New York NY, 16 May 1951, William J. Haggerty Papers, Sojourner Truth Library, SUNY New Paltz. In the same collection see also State University of New York, State Teachers College, New Paltz, "History of Student-Faculty Interest in a College Campsite at New Paltz" (undated typescript).

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In both phases of its development—in the Gilded and Progressive eras and from the 1930s through the 1960s—outdoor education was motivated by concern over the physical and mental fitness of American youth and their consequent ability to take on the challenges of each modern age. In the years after the Civil War, as urbanization and immigration increased markedly, the first summer camps arose for boys; Dr. Joseph T. Rothrock founded the short-lived North Mountain School for Physical Culture in rural Pennsylvania in order to bring “weakly boys in summer out into camp life in the woods and under competent instruction, mingling exercises and study, so that pursuit of health could be combined with acquisition of practical knowledge outside the usual academic lines.” By the turn of the century camps by the dozens had been founded for male and female factory workers, for tuberculosis patients, for underprivileged urban children. The palliative and fortifying qualities of camp life seemed a partial response as well to concern about the closing of the American frontier: the 1890 federal census had reported the frontier at last broken up, and in 1893 historian Frederick Jackson Turner openly worried that with the end of the frontier the fountainheads of the American identity—innovation and democracy—would also die. Naturalists, most notably John Muir, began to argue that “national strength no longer came from conquering the remnants of wilderness but from the enjoyment of the remaining wilderness.”<sup>9</sup>

American educators also sought to sustain “the influence of wilderness in American civilization,” as historian Roderick Nash has put it. Chief among them was John Dewey (1859-1952), whose ideas about developing the “whole child” influenced generations of scholars and educators. Dewey argued that American schools had grown “unduly scholastic and formal” and that encouraging the “native tendencies” of children “to explore, to manipulate tools and materials, to construct, to give expression to joyous emotion” would make learning more effective and school itself “a joy.” When children have a chance to engage in such physical activity, Dewey held, “the whole pupil is engaged, the artificial gap between life in school and out is reduced. . . . Play and work correspond, point for point, with the traits of the initial stage of knowing, which consists . . . in learning how to do things and in acquaintance with things and processes gained in the doing.” He also maintained that engaging children in these activities would enhance their “later usefulness” and help develop within them “a socialized disposition.”<sup>10</sup> In 1896 Dewey began to implement his theories at the University of Chicago Laboratory School, and he continued this work after moving to the Teachers College at Columbia University in 1904. Dewey’s students began to establish schools based on his teachings as well. “The thing I really wanted was to break up as far as possible the formality and artificiality of my classroom,” Mary Hammett Lewis wrote of her first experiences at the Horace Mann School in New York, which Columbia Teachers College had founded in 1887 as an experimental school to test educational theory. Lewis, who came to teach at the school in 1902, substituted a large carpet for chairs and desks and had children help build an open-air classroom on the school’s roof. When a group of parents consulted Dewey about setting up a school on his model in Buffalo, he recommended a visit to Lewis’s school, and in 1912, at their request, she established the first Park School in that city, where, Lewis wrote, children “learned to love work because they could see its real significance.” She maintained that in growing potatoes for students’ lunches, raising chickens to sell their eggs, and building many of their own campus structures students learned a great deal about traditional classroom subjects and

<sup>9</sup> Ron Watters, “Historical Perspectives of Outdoor and Wilderness Recreation in the United States,” *Outdoor Program Manual* (Pocatello: Idaho State University Press, 1986), 1-9.

<sup>10</sup> John Dewey, *Democracy and Education* (1916), Project Gutenberg website, <https://www.gutenberg.org/files/852/852-h/852-h.htm#link2HCH0015>.

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“how much larger a proportion of time was in reality given to the academic work than might appear” in this physical work.<sup>11</sup>

Lewis felt that by the time she arrived, even the Horace Mann School, with its “ready-made standardized perfection” in the form of a carefully conceived curriculum, generous funding, and abundant supplies, had grown stultifying for both teachers and students. Despite the efforts of Progressive-era educators like her, American schools increasingly relied on classroom instruction, books, and “rote learning” even as the academic study of outdoor education advanced the notion that, as educator Boyd Bode later put it, “Reading in a book will not of itself give us sense of beauty or comradeship or self-reliance or intellectual curiosity or social responsibility. These things must be lived to become realized.”<sup>12</sup>

In 1925 Lloyd Burgess Sharp (1895-1963), who had studied with Dewey at Columbia Teachers College and whose dissertation explored camping education, was hired to evaluate and restructure the Fresh Air Farms first put in place by *Life* Magazine editor John Ames Mitchell in 1887. Created to provide poor city children with several weeks of fresh air and exercise in the country, the Fresh Air Camps had become dilapidated and excessively militaristic and hierarchical by the 1920s. Sharp changed the name of the farms to Life Camps and revamped them to embody his belief that camping was meant to inspire “living to live in the woods and open spaces” and that both camp and school grounds should be used all year as sites of experiential learning. “Most camps for children were too concerned with sports or strict regimentation to place proper emphasis on the value of experiencing nature,” he told a Milwaukee recreation association meeting in 1961.<sup>13</sup> Sharp became the leading American authority on outdoor education and designed more than a hundred such centers in the United States over the course of his career.<sup>14</sup> In 1940 Sharp founded the National Camp for Advanced Leadership in Camping Education, which he described as “a new kind of outdoor school on the graduate level for school administrators, teachers and leaders from youth serving agencies interested in developing programs for outdoor education.” The National Camp continued to train outdoor educators after *Life* Magazine closed its Life Camps in 1951.<sup>15</sup>

Sharp found the same faults in schools as he had found at the Life Fresh Air Camps. Speaking publicly and often to educators across the country, he told a group of teachers in Springfield, Massachusetts, that “the range of experience in the average school is so narrow that the pupils hardly realize what they are studying about” and another in San Diego that “we must have more realism and more direct learning in the school program.”<sup>16</sup> In one 1952 journal article, Sharp offered a concrete example of his meaning:

<sup>11</sup> Mary Hammett Lewis, *An Adventure with Children* (1928; reprint, Buffalo NY: The Park School of Buffalo, 2011), 22-23, 133. See also “Out-Of-Doors Schoolroom,” *Illustrated Buffalo Express*, 19 May 1912, 25, which notes that Lewis had been at Horace Mann school “for a decade” when she was invited to start the Buffalo school.

<sup>12</sup> On the website [www.wilderdom.com](http://www.wilderdom.com): James Neil defines outdoor education as “a semi-ritualized form of encounter with nature since Western consciousness moved indoors.” Boyd Bode, “The Role of Camping in a Living Democracy,” *Camping Magazine* 14 (February 1942); reprinted in Donald R. Hammerman and William M. Hammerman, comps., *Outdoor Education: A Book of Readings* (Minneapolis: Burgess Publishing Co., 1968), 27-28.

<sup>13</sup> “Claims Frustrated Can Get Release through Camping,” *Milwaukee Journal Sentinel*, 3 November 1961.

<sup>14</sup> Julia A. Carlson, “The Collection Works of Lloyd Burgess Sharp: Pioneer of the Outdoor Education Movement in the United States,” *Cornerstone* (Mankato: Minnesota State University, 2016); [L. B. Sharp], which provides a link to “A Certain Kansas Lad” (notes for an autobiography). On the Life Camps see Joel F. Meier and Karla A. Henderson, *Camp Counseling: Leadership and Programming for the Organized Camp* (Long Grove, IL: Waveland Press, 2012), 17; and “Life’s Fresh Air Fund,” *Life* 76, 1966 (8 July 1920), 64, Google Books; H. W. Gibson, “The History of Organized Camping,” *Camping Magazine* 8 (March 1936): 18, 19, 26-29, reprinted in Hammerman and Hammerman, *Outdoor Education*, 96-103.

<sup>15</sup> Sharp is quoted in “Visitor Lauds Camp Cuyamaca,” *San Diego Union*, 2 April 1948, 21.

<sup>16</sup> “Need for Camping Experience Outlined,” *Springfield (MA) Republican*, 23 July 1941, 4; “Visitor Lauds Camp Cuyamaca.”

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In a unit of geography a teacher spent three lessons trying to teach her class about contours, and succeeded only in making them think that contour lines may somewhere be found on the earth, where they would appear to be wavy, as they appeared in the geography books and on the blackboard. But at the rear of the school, there was an eight-foot hill. With encouragement from the teacher, the members of that class could have made their own contour map of their own school grounds. They could have made a level, and with this and a ruler, could have figured the height of that small hill and the percent of grade. This could all have been done in a forty-minute class period, and a fuller grasp of the significance of contours would have been acquired. The unit of learning would have cost the school district less money. Outdoor education is a method of teaching, as well as a principle of using the out-of-doors wherever possible.<sup>17</sup>

At New Paltz, Haggerty and some faculty and students were clearly aware of Sharp's work. Haggerty noted in 1949 that the school's interest in camping education was manifest in the fact that it had sent "the maximum number of students and faculty members to Life Camp under the direction of L. B. Sharpe" and had regularly sent faculty to the New York State Department of Conservation's Camp DeBruce in nearby Liberty, New York, for fall conservation workshops.<sup>18</sup> Interest in the discipline increased noticeably in the 1940s. The Cornell University Rural School Leaflet series' annual "Teachers Number" had begun to discuss outdoor education by 1944 and in later numbers offered curriculum suggestions. In 1947 the state conservation department and SUNY cosponsored the first conservation education in New York State, and by 1950 New Paltz was one of at least four colleges in the SUNY system to offer courses on conservation.

In his 1951 reference to the outdoor education efforts of the state of Michigan, Haggerty was alluding to the Kellogg Foundation Camps, first established by the W. K. Kellogg Foundation in 1932 as an experiment in outdoor education; its camp at Clear Lake, Michigan, which began in 1940, is said to have been the first year-round public school camp in Michigan. The foundation had established health and education programs in seven rural Michigan counties, and the camps arose from the recognition that "there were still whole areas of everyday living that even schools equipped with the finest teaching and physical facilities could not begin to explore." The foundation established three year-round camps in the state, which evolved from summer camps to year-round "educational camping" in Michigan public school systems based on developing the "whole child." One 1942 Kellogg Foundation history stated that the camps offered "out-of-door activities with ample opportunities for nature study, 'trading posts' where children conduct the camp stores, home economics rooms, and workshop. The whole process of working and living together with sympathetic friends for instructors is a valuable experience for teachers and parent as well as for children." The camps aimed to offer children "practical preparation for life and citizenship in a democracy." In 1957 the foundation deeded one of the three camps, at Clear Lake, to the Battle Creek Public Schools.<sup>19</sup>

Haggerty and others at New Paltz wanted to use the Kellogg Foundation camps as a model, but the school lacked an adequate facility for it and confronted a scarcity of public school teachers sufficiently versed in outdoor education to run it. Haggerty's plan was to develop a campsite where education faculty and students could implement outdoor education theory among children from the Campus School and where students

<sup>17</sup> L. B. Sharp, "What Is Outdoor Education?" *School Executive* 71 (August 1952), reprinted in Hammerman and Hammerman, *Outdoor Education*, 1-6.

<sup>18</sup> SUNY New Paltz, "History of Student-Faculty Interest in a College Campsite at New Paltz." In the 1940s the New York State Conservation Department had acquired a former private estate and fish hatchery in Liberty and revamped it as a conservation education camp called Camp DeBruce.

<sup>19</sup> *W. K. Kellogg Foundation: The First Eleven Years, 1930-1941* (Battle Creek MI: Trustees of the W. K. Kellogg Foundation, 1942), 30; see also Clear Lake Camp website, <http://www.clearlakecamp.org/aboutus.html>.

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bound for elementary school job could learn effective technique and practice. By then Archer Huntington had given his father's Adirondack Great Camp, Pine Knot, on Raquette Lake to SUNY Cortland to develop as an outdoor education center, and it had conducted its first program there in the summer of 1948. At some point afterward, Haggerty invited SUNY Cortland president Donna V. Smith to speak to faculty about Huntington Memorial Camp, as Pine Knot was renamed, and to consult with the student-faculty camping committee.<sup>20</sup>

Several undercurrents shored up the postwar interest in outdoor education. One was juvenile delinquency, perceived to have been rising alarmingly since the Second World War had placed mothers in the labor force. The Kellogg Foundation had observed that "certain classes of pre-delinquent children, children from broken homes, and others with special needs" seemed to benefit especially from school camping programs, and the authors of Cornell's 1946 Rural School Leaflet on outdoor education suggested similarly. "School authorities are now beginning to recognize that they have neglected exceptional opportunities when they have left children almost without guidance in their activities outside the school building and outsider their own homes," the leaflet stated. ". . . Reasonable guidance when youngsters are away from normal disciplines may help them to avoid many of the pitfalls that may lead to delinquency, accident, bad habits, or unwise associations."<sup>21</sup> Another was the perceived strain on and abuse of the natural world that accompanied population growth and changing recreational preferences. "The rapid depletion of our natural resources, the population increase and the ensuing increase in the use of outdoor facilities make it of paramount importance that we, as educators, take leadership in educating our students in conservation and proper use of our outdoor heritage," George Fuge of SUNY Cortland's Huntington Memorial Camp argued in 1964.<sup>22</sup>

A third was the perceived need for preparedness in a country seemingly caught unawares by the attack on Pearl Harbor and for sustaining democratic systems in the face of fascism. Philosopher of education Boyd Bode had visited youth camps in Germany in 1937 and found them at once admirable and "sinister" in their training to fascism. American camps ought by contrast "to bring to fruition the tradition which was born on the frontier and which has made the name of America synonymous with liberty and opportunity all over the world." German Jewish educator Kurt Hahn, whose philosophy inspired the Outward Bound movement, had fled Nazi Germany for Scotland in 1933 and began to develop an outdoor education program at Gordonstoun that attempted to stem the decline in fitness, skill, and ambition among adolescents brought on by "spectatoritis," modern means of travel, weakened crafts traditions, and the pace and confusion of modern life. Hahn insisted on enrolling a relatively high percentage of non-British students on the grounds that "the boy growing up in brotherhood with foreigners, cannot help but learn to care about the rights and happiness of at least one other nation." He also believed in "the brotherhood of classes" and adjusted tuition fees to ensure that children from families along the spectrum of economic means could attend.<sup>23</sup>

In 1942 educator Eduard Lindeman advocated an expansion of camping in the United States "because our children will need it more than ever before as a release from pressures at home and from the war psychology of movies and radio. We must give our children a genuine democratic experience. We must work on improving our democracy at home if we are to win this war in the field." Herman Cooper of SUNY Albany termed the

<sup>20</sup> SUNY New Paltz, "History of Student-Faculty Interest in a College Campsite at New Paltz."

<sup>21</sup> *W. K. Kellogg Foundation: The First Eleven Years, 1930-1941*; New York State Agricultural College, *Outdoor Education*, Cornell Rural School Leaflet Teachers Number 40, 1 (September 1946), 9-10.

<sup>22</sup> George Fuge, chairman-elect Outdoor Education Administration, Huntington Memorial Camp of the State University College at Cortland, Raquette Lake NY, to Dr. Frank T. Lane, SUNY Albany, 24 March 1964, Haggerty Papers.

<sup>23</sup> Waters, "Historical Perspectives"; Kurt Hahn, "Education and Peace: The Foundations of Modern Society," *The Inverness Courier*, 24 March 1936, on [www.kurthahn.org](http://www.kurthahn.org).

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inclusion of more field trips, demonstrations, and experiments into the basic education of New York State public school teachers as part of “survival education. . . . The whole program of science preparation needs to be restudied and reoriented if it is to accomplish the goals of human and national survival,” Cooper stated in a memorandum to SUNY presidents in October 1950.<sup>24</sup>

Cooper, Haggerty, and other SUNY presidents were virtually certain that public school teachers would soon be expected, if not required, to teach water, soil, forest, fish, and wildlife conservation. Still, eight years passed before SUNY New Paltz was able to secure the Winchell Falls site for its Ashokan Field Campus. In the intervening years Haggerty continued to develop the rationale for the camp. It would be a model program, he wrote, that would demonstrate “how children live and learn in the relaxed atmosphere of the great outdoor classroom.” It would provide “in-service training” to public school teachers in a relaxed graduate-level summer program: the Kellogg Foundation had learned, he noted, that school staff and teachers were more inclined to attend conferences “while they are relaxing in camp clothes and sharing the work of operating the camp.” Teachers would be able to try new teaching methods and take courses in field biology and geology, conservation, child psychology, and camping education. Third, Haggerty proposed that all New Paltz education students spend two weeks at the college camp “to live with children” and integrate what they learned with their course work. Haggerty envisioned numerous ancillary uses for the campsite—a space for new-student orientation and for college faculty to relax and to undertake in-service training, a retreat for college committees, a site for state university conferences.<sup>25</sup>

Even before the camp’s location was firmly settled Haggerty appears to have set his sights on Merrill H. Archard to run “the proposed New Paltz State Teachers College school camp.” Archard had graduated with a degree in health and physical education from what was then Cortland State Teachers College in 1946 after having served three years with the Tenth Mountain Division in Italy during World War II. Within a month he began graduate work at the Teachers College at Columbia University, and he taught a course on the administration of institutional and private camps at New York University before Haggerty hired him as supervisor of physical education at the SUNY New Paltz Campus School in 1948. After he received his doctorate in camping education from Columbia in November 1956, he wrote to thank Haggerty for the year-long sabbatical he needed to finish his graduate work and added, “I have more time now to devote to the quest for a college campsite.” Archard, with his wife, daughter, and son-in-law, had been running Camp Laurel on Lake Awosting near New Paltz since 1949. After reviewing the literature on school camping and interviewing with faculty at the six other SUNY colleges then running school camps, Archard had set forth a “table of principles” for school camping for Haggerty in March 1956. Archard determined school camping had advanced beyond being “an educational frill” to being a legitimate part of a teachers’ college curriculum.<sup>26</sup>

## DEVELOPMENT OF THE ASHOKAN FIELD CAMPUS

After the college purchased it from the Banks family in 1957, the Winchell Falls property underwent a physical transformation with the construction of camp housing (bunkhouses) and recreational facilities, including

<sup>24</sup> Bode, “The Role of Camping in a Living Democracy”; Lindeman quoted in “Girl Scout News,” *Dispatch* (Moline IL), 12 February 1942, 20; Herman Cooper, Executive Dean for Teacher Education, State University of New York Albany, Memorandum for Presidents of State University Teachers Colleges, 5 October 1950, Haggerty Papers.

<sup>25</sup> “Purposes to be Served by the College Camp” in SUNY New Paltz, “History of Student-Faculty Interest in a College Campsite at New Paltz.”

<sup>26</sup> Merrill H. Archard to Dr. William J. Haggerty, 27 March 1956, Haggerty Papers.



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athletic fields and swimming facilities. The extensive “campus” provided the opportunity to engage with a wide variety of natural elements. Based on the premise that improving a student’s familiarity with the outside world, both natural and social, was important, Dr. Merrill H. Archard, the assistant principal of the college’s campus school, used the Ashokan Field Campus’s setting to teach about the environment and its protection, a relatively new concept at the time. The physical remains of cultural features on the site were used to introduce students to the broad cultural history represented there. And the camp addressed another crucial tenet of outdoor education: interacting in a community and learning roles for good citizenship.

By 1965, Archard had moved on and the success of the camp led Haggerty to hire a full-time director. He selected Kent Reeves, a graduate of Southern Illinois University, where he had studied under L.B. Sharp, one of the seminal figures in the outdoor education field. Reeves continued the outdoor education program as Archard had designed but soon expanded the curriculum to include living history. Farm animals were introduced to provide an understanding of where food came from, and farm buildings were built within an agricultural setting to replicate a traditional farmstead. An “Indian Village” was also assembled, but that has been removed from the program until a more accurate one can be planned. Reeves and assistant director Andrew H. Angstrom also introduced rural crafts into the curriculum. They were following the trend of other back-to-the-land movements emerging at that time, the best known being Foxfire, which educator Eliot Wigginton initiated in 1966 in rural Georgia to get students involved in Appalachian history and culture. A major component of the Foxfire mission was collecting oral histories from older community residents and document the skills, traditions, experiences, and history of the traditional Appalachian way of life. This project would last for decades and produce books, records, videotapes, a museum, a Web site, a Hollywood movie, and an ongoing magazine.<sup>27</sup>

The construction of the Ashokan Dam and the flooding of a vast area for New York City’s first Catskills reservoir obliterated scores of hamlets and farmsteads and necessitated the relocation of hundreds of people. This assault on the traditional Catskills way of life by the modern city created a nostalgia (and a deep resentment) that is sustained today, and it led to the creation of a number summer camps in the region where the occupations, music and folklore of this lost rural era were taught and artifacts collected.<sup>28</sup> These summer camps were populated with city children from progressive and unionist families, with whom the image of the rural workingman resonated. One of them was Camp Woodland, near Phoenicia, New York, which operated from 1933 to 1962 as a summer haven for the children of leftists who attended the Little Red School House in New York’s West Village. It was established by Norman Studer, a teacher at the Little Red School who had studied with John Dewey at Columbia Teachers College; folk icon Pete Seeger worked as a counselor there as a young man. Catskill culture, oral history, crafts and music central to its program, charged by the anger over displacement and relocation of people and buildings by the Ashokan Reservoir (and others that came later), of modernity obliterating traditional life.<sup>29</sup>

Kent Reeves wanted to create a working museum village modeled after others such as Old Sturbridge Village in nearby Western Massachusetts. One of the first things he and Angstrom did was build a blacksmith’s forge

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<sup>27</sup> New Georgia Encyclopedia. <https://www.georgiaencyclopedia.org/articles/education/foxfire>

<sup>28</sup> The history of the New York City watershed and its vast impact on the Catskills region is a rich and complicated one that is outside the scope of this nomination

<sup>29</sup> Dale W. Johnson, “Camp Woodland, Progressive Education and Folklore in the Catskill Mountains of New York, *Voices, Journal of New York Folklore*, Vol.28, Spring-Summer 2002, <http://www.nyfolklore.org/pubs/voicj28-1-2/campwood.html>.

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in the basement of the Moehring barn where campers could learn the craft and its role in the life of a rural community. Later they built a glassblowing shop and hired a skilled craftsman, Nancy Freeman, to demonstrate and teach there. This building later became a second blacksmith shop and a charcoal kiln was constructed outside. A pewter shop was constructed and a historic lawyer's office was moved to the camp from Tillson, New York, on a hay wagon towed by Reeves's pick-up truck. This building would house a print shop. A building containing tin and broom shops was built and a derelict outhouse, given by a neighbor, was relocated to the camp.

Farm-related buildings were constructed by the staff using historic designs and construction techniques derived from Eric Sloane's books. American landscape painter Eric Sloane authored a series of popular books focused on American agricultural history, architecture, and folklore. His detailed illustrations shed light on historic construction techniques and tools, and captured the imagination of readers interested in early American life and material culture.<sup>30</sup> The most significant of the buildings constructed at Ashokan is a wagon shed with a complex joined frame that became the shelter for a collection of old domestic and agricultural machinery Reeves assembled from obsolete objects found on area farms. In addition, a granary, smoke house and maple sugar shack were built. Fenced yards were created for farm animals to expose campers to the traditions of animal husbandry. In 1985 Reeves and Angstrom dismantled a stone school house in the Town of Olive and moved it to the camp where Angstrom reconstructed it after reading books on masonry construction. He also built a replica log dwelling on the foundation of one lost to fire on a hilltop farm west of the camp. A cruder log hut was built to represent a trappers' cabin. Old roads on the west side of the Esopus were repurposed as hiking trails for exposure to natural and cultural history. Stone wall enclosures, basement holes, bluestone quarry sites, log chutes and the roads themselves served as visual evidence of early life. One of those log chutes was made into a downhill ski slope aided by a make-shift rope tow driven by the rear wheel of an old pick-up truck. Reeves's and Angstrom's direct involvement in the creation of these demonstration buildings, in part driven by economy but dedicated to recreating some sense of an authentic experience, is remarkable. The replica building program set the Ashokan Field Campus apart from other outdoor education camps.

In an interview, Kent Reeves emphasized what he saw as the role of historic crafts in outdoor education.

The Ashokan Field Campus operates an environments education program concerned with not only our present, but our past environment as well. Classes with their teachers, come up for a week at a time. Besides learning about the natural history of the area, students learn the roles of various early American craftsmen such as, blacksmiths, pewterers, chandlers, tinsmiths, broom makers, printers and so forth. Besides the environmental educational program, the Field Campus researches early American Craft. They have redeveloped and recreated glass making such as they had in Woodstock early in the 19<sup>th</sup> century, salt glaze potters as they had throughout the Hudson Valley and the craft of pewterer which died out in America during the 19<sup>th</sup> century.<sup>31</sup>

Ashokan Field Campus also served as a laboratory in international education, another of Haggerty's primary interests. He had been a vocal supporter of the United Nations, he instituted an undergraduate program in international studies, and he worked to revive the SUNY New Paltz International Relations Club in 1960. Two years later he invited 80 persons volunteering to serve in the Peace Corps in Sierra Leone to train on campus

<sup>30</sup> Abigail Walhausen, "An Americana of Tools and Manners: Eric Sloane's Nostalgia," *Common-Place* 13 (2013). Digital journal. <http://www.common-place-archives.org/vol-13/no-04/walhausen/>

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and at the campsite during the summer. According to the *Poughkeepsie Journal*, Haggerty stated that SUNY New Paltz had been “for some time the only college in the country that required every undergraduate to take a course on Africa,” and two New Paltz students from Sierra Leone who were fluent in Mende and Krio dialects taught the volunteers. During the last two weeks of their training the Peace Corps volunteers took a “fitness program” at the Ashokan Field Campus, including a lifesaving course using “natural materials available in a wilderness environment.”<sup>32</sup> In the 1960s the field campus was also the site of summer graduate programs in field botany, environmental ecology, and conservation field studies, a school administrators’ workshop titled “American Education in a Revolutionary World: Challenge to Our Schools,” and Boy Scout leadership training. Reeves worked with the Southern Ulster Migrant Action Committee to run a summer camp for the children of migrant farm workers in the regions, and he arranged with the Nassau County Board of Cooperative Educational Services to bring fifth- and sixth-graders from Long Island to “mingle” with students from nearby schools in a week-long summer program. There students learned pewtering, broom making, “how to care for farm animals, how to combat pollution, how to get along with your fellowman.”<sup>33</sup>

#### LATER HISTORY OF THE ASHOKAN CENTER

After William J. Haggerty’s retirement in 1966, the name of the facility was changed from New Paltz College Camp to Ashokan Campus, which Reeves then modified to Ashokan Field Campus. During this time, Kent Reeves developed a relationship with the Nassau County, New York, Board of Cooperative Educational Services (BOCES) which, during the school year, bussed fifth- and sixth-grade students from Long Island to the Ashokan Field Campus for “first-hand learning” in nature and social studies. The camp was staffed by college students, many from Midwest colleges, fulfilling field-work requirements in outdoor education. For many years, the Ashokan Field Campus operated a summer program for the children of migrant farm workers in the region sponsored by the Southern Ulster Migrant Action Committee (SUMAC).

In 1980 the first Ashokan Fiddle and Dance Camp was held at the Ashokan Field Campus. Organized by accomplished local folk musicians Jay Ungar and Molly Mason, the event became a mainstay of the campus’s annual program. When SUNY New Paltz endeavored to sell the property in 2006, Ungar and Mason and attorney Rosemary Nichols formed the Ashokan Foundation, a not-for-profit organization and worked with the Open Space Institute (OSI) and its then president, Joe Martens, to negotiate the purchase of the campus. In 2008 OSI purchased the 360-acre property from SUNY New Paltz Campus Auxiliary Services, Inc., successor to the New Paltz College Association.<sup>34</sup> This tract was subdivided into three parcels. Two parcels consisted of the high ground on the north and south sides of Esopus Creek and the third parcel consisted of the low ground along both banks of the Esopus. The City of New York Department of Environmental Protection then purchased this low-lying parcel, a total of 258 acres, with a use agreement with the Ashkan Foundation. OSI then conveyed the north and south high ground parcels, totaling 127 acres, to the Ashokan Foundation along with some of the funds that OSI had received from the city in payment for the 258-acre parcel, which the foundation utilized to build new dormitories and dining facilities to replace old bunkhouses, which were in poor

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<sup>31</sup> Vera Van Steenberg Sickler, *The Town of Olive Through the Years, Part 1* (Kingston NY: by the author, 1976), 63-65.

<sup>32</sup> “New Paltz College to Train Peace Corps Unit,” *Poughkeepsie Journal*, 11 June 1962, 1.

<sup>33</sup> Lynn Mulvaney, “Living and Learning Experience at New Paltz Ashokan Campus,” *Kingston Daily Freeman*, 18 June 1970, 25. See also “Paltz Summer Session Begins on Tuesday,” *Kingston Daily Freeman*, 2 July 1960, 10; “Summer Sessions Begin at New Paltz College on Monday,” *Kingston Daily Freeman*, 29 Jun 1961, 34; “Workshops for School Administrators Set for May 14 and 15,” *Kingston Daily Freeman*, 12 March 1965, 11; “Scout Program to be Outlined,” *Kingston Daily Freeman*, 18 January 1967, 28.

<sup>34</sup> Ulster County Deeds, 4573:213, 5/12/2008.

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condition and located in areas vulnerable to flooding. The reformulated Ashokan Center was opened in 2008, fifty-one years after the inception of the New Paltz College Camp and 287 years after Jacobus Bush established his homestead on the Esopus, and it continues to offer programs in outdoor education and craft history to regional schools, as well as an expanded series of cultural events produced by Jay Ungar and Molly Mason and others.

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**Previous documentation on file (NPS):**

preliminary determination of individual listing (36 CFR 67 has been requested)  
 previously listed in the National Register  
 previously determined eligible by the National Register  
 designated a National Historic Landmark  
 recorded by Historic American Buildings Survey # \_\_\_\_\_  
 recorded by Historic American Engineering Record # \_\_\_\_\_  
 recorded by Historic American Landscape Survey # \_\_\_\_\_

**Primary location of additional data:**

State Historic Preservation Office  
 Other State agency  
 Federal agency  
 Local government  
 University  
 Other  
Name of repository: Ashokan Center, Olivebridge NY

\_\_\_\_\_  
\_\_\_\_\_  
Historic Resources Survey Number (if assigned):  
\_\_\_\_\_  
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**10. Geographical Data**

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**Acreage of Property** 359.82  
(Do not include previously listed resource acreage.)

**UTM References**

(Place additional UTM references on a continuation sheet.)

1	<u>18</u> Zone	<u>566050</u> Easting	<u>4643686</u> Northing	3	<u>18</u> Zone	<u>565771</u> Easting	<u>4641912</u> Northing
2	<u>18</u> Zone	<u>566877</u> Easting	<u>4641595</u> Northing	4	<u>18</u> Zone	<u>565529</u> Easting	<u>4642806</u> Northing

**Verbal Boundary Description** (Describe the boundaries of the property.)

The boundary is indicated by a heavy line on the enclosed map with scale.

**Boundary Justification** (Explain why the boundaries were selected.)

The boundary was drawn to encompass the tract assembled by the New York State Teachers College at New Paltz for the Ashokan Field Campus in 1957.





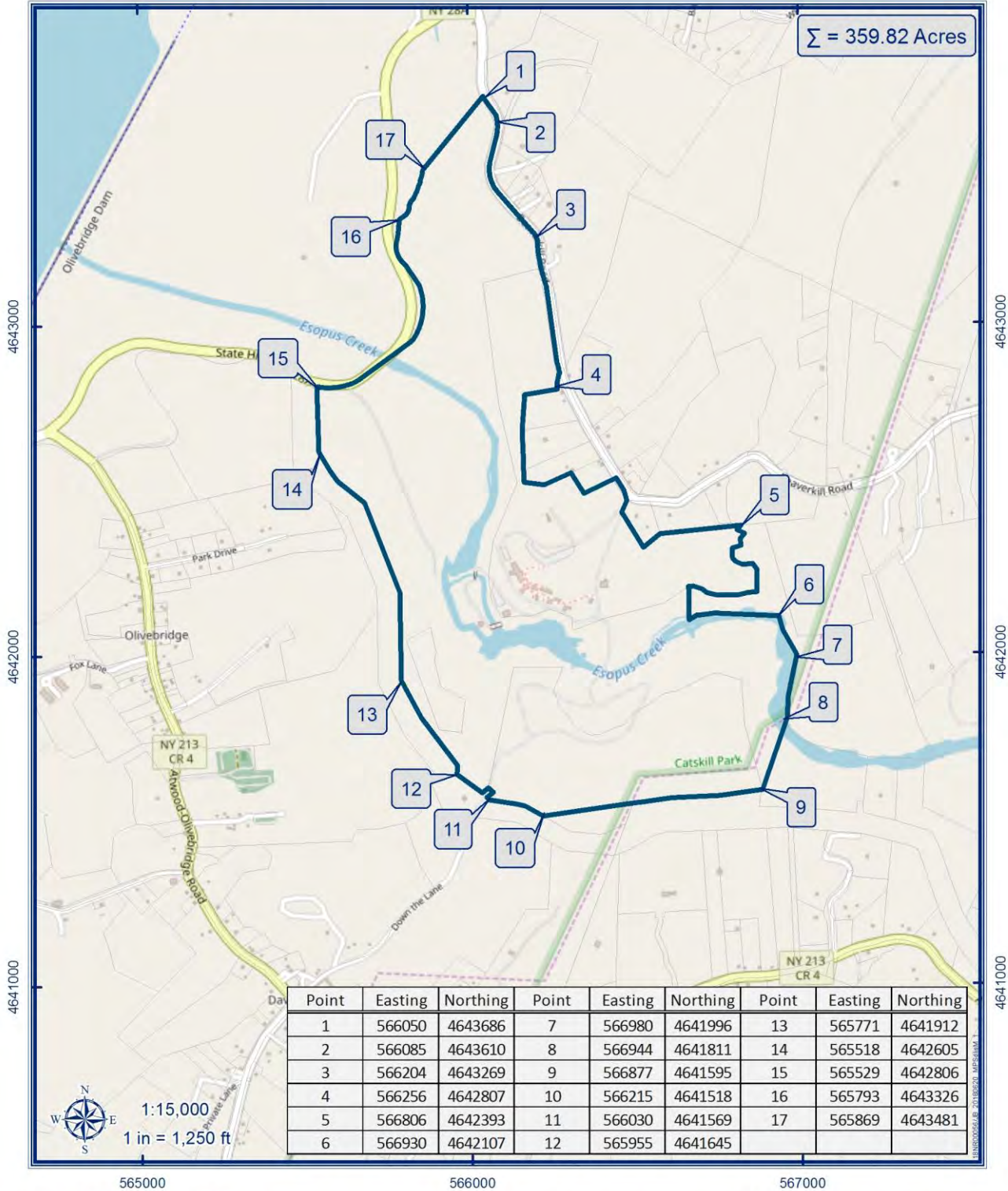


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477 Beaverkill Road  
 Olive Bridge, NY 12461



Coordinate System: NAD 1983 UTM Zone 18N  
 Projection: Transverse Mercator  
 Datum: North American 1983  
 Units: Meter



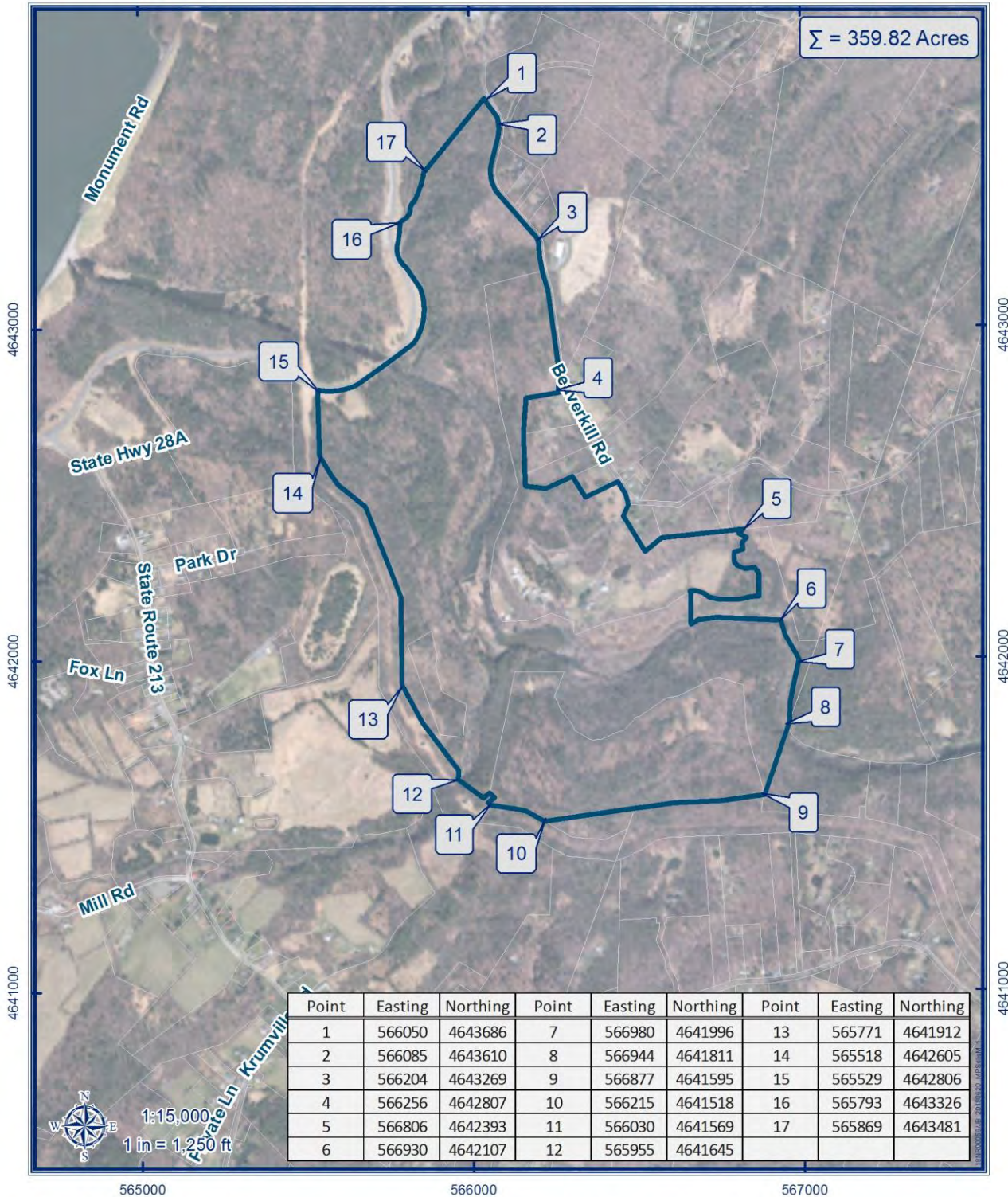


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Ashokan Field Campus Historic District Site Plan

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11. Form Prepared By

name/title Neil Larson & Kathryn Grover

organization Larson Fisher Associates, Inc.

date 7 June 2018

street & number P.O. Box 1394

telephone 845-679-5054

city or town Woodstock

state New York

zip code 12498

e-mail nlarson@hvc.rr.com

Additional Documentation

Submit the following items with the completed form:

- **Maps:** A **USGS map** (7.5 or 15 minute series) indicating the property's location.

A **Sketch map** for historic districts and properties having large acreage or numerous resources. Key all photographs to this map.

- **Continuation Sheets**

- **Additional items:** (Check with the SHPO or FPO for any additional items.)

Photographs:

Submit clear and descriptive photographs. The size of each image must be 1600x1200 pixels at 300 ppi (pixels per inch) or larger. Key all photographs to the sketch map.

Name of Property: Ashokan Field Campus Historic District

City or Vicinity: Olivebridge

County: Ulster State: New York

Photographer: Neil Larson

Date Photographed: 2017 & 2018

Description of Photograph(s) and number:

NY\_Ulster Co\_Ashokan Field Campus\_0001

View of Winchell-Moehring House (#1 on site map) from east.

NY\_Ulster Co\_Ashokan Field Campus\_0002

View of Winchell-Moehring House (#1) from west.

NY\_Ulster Co\_Ashokan Field Campus\_0003

View of Winchell-Moehring House (#1) from south.

NY\_Ulster Co\_Ashokan Field Campus\_0004

Winchell-Moehring House; Federal-style mantel in north room, added ca. 1937.

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NY\_Ulster Co\_Ashokan Field Campus\_0005

Winchell-Moehring House; Beams and boards added to ceiling in north room, ca. 1937.

NY\_Ulster Co\_Ashokan Field Campus\_0006

Winchell-Moehring House; south "Tavern room," pine paneling & fireplace added ca. 1937; walls painted and bar added ca. 1970.

NY\_Ulster Co\_Ashokan Field Campus\_0007

Reproduction entrance, south side, ca. 1937.

NY\_Ulster Co\_Ashokan Field Campus\_0008

Reproduction door, interior, ca. 1937.

NY\_Ulster Co\_Ashokan Field Campus\_0009

View of Moehring Barn (#3) from SW.

NY\_Ulster Co\_Ashokan Field Campus\_0010

View of Moehring Barn (#3) from north; Winchell-Moehring House (#1) in background on right.

NY\_Ulster Co\_Ashokan Field Campus\_0011

View of Wagon Shed (#4) from NE. Outdoor stage in background.

NY\_Ulster Co\_Ashokan Field Campus\_0012

View of interior of Wagon Shed (#4) showing timber frame joinery.

NY\_Ulster Co\_Ashokan Field Campus\_0013

View of Granary (#5) and animal pastures from NW.

NY\_Ulster Co\_Ashokan Field Campus\_0014

View of Smokehouse (#6) and Hillside Amphitheater & Outdoor Stage (#6) from east.

NY\_Ulster Co\_Ashokan Field Campus\_0015

View looking SE from Hillside Amphitheater (#7) showing Wagon Shed (#4) on left with Moehring Barn (#3) behind it; Granary (#5) and Smokehouse (#6) in center; and Winchell-Moehring House (#1) and Outdoor Stage (#7) on right.

NY\_Ulster Co\_Ashokan Field Campus\_0016

View of Winchell's Falls and Hudson River Pulp & Paper Manufacturing Co. Dam and Mill Site (#8) from south.

NY\_Ulster Co\_Ashokan Field Campus\_0017

View of Hudson River Pulp & Paper Manufacturing Co. Mill Site (#8) at creek level from south.

NY\_Ulster Co\_Ashokan Field Campus\_0018

View of upper level of Hudson River Pulp & Paper Manufacturing Co. Mill Site (#8) from north.

NY\_Ulster Co\_Ashokan Field Campus\_0019

View of Ashokan-Turnwood Covered Bridge (#9) from west.

NY\_Ulster Co\_Ashokan Field Campus\_0020

View of wood truss on interior of Ashokan-Turnwood Covered Bridge (#9).

Ashokan Field Campus Historic District  
Name of Property

Ulster, New York  
County and State

NY\_Ulster Co\_Ashokan Field Campus\_0021  
View of Stone Schoolhouse (#10) from east.

NY\_Ulster Co\_Ashokan Field Campus\_0022  
View of Stone Schoolhouse (#10) from south.

NY\_Ulster Co\_Ashokan Field Campus\_0023  
View of Pewter Shop (#13), Maple Sugar Shack (#12) and Garden Shed (#11), left to right, from East; sheep pen in foreground.

NY\_Ulster Co\_Ashokan Field Campus\_0024  
View of Pewter Shop (#13) and Print Shop (#14), right to left, from SW.

NY\_Ulster Co\_Ashokan Field Campus\_0025  
View of Privy (#15) from south.

NY\_Ulster Co\_Ashokan Field Campus\_0026  
View of Tin & Broom Shops (#16) from SW.

NY\_Ulster Co\_Ashokan Field Campus\_0027  
View of Comfort Station (#17) from SW.

NY\_Ulster Co\_Ashokan Field Campus\_0028  
View of Glass & Blacksmith Shops (#18) from SE.

NY\_Ulster Co\_Ashokan Field Campus\_0029  
View of Glass & Blacksmith Shops (#18) from SW.

NY\_Ulster Co\_Ashokan Field Campus\_0030  
View of Old Foundation (#19) from north.

NY\_Ulster Co\_Ashokan Field Campus\_0031  
View of Playing Field (#20) from north with Comfort Station (#21) and Picnic Pavilion (#22), left to right.

NY\_Ulster Co\_Ashokan Field Campus\_0032  
View of Picnic Pavilion (#22) from north.

NY\_Ulster Co\_Ashokan Field Campus\_0033  
View of Beach (#23) with Sauna & Equipment Shed (#24) on left, from west. Winchell's Falls and roof of Turnwood Covered Bridge in background.

NY\_Ulster Co\_Ashokan Field Campus\_0034  
View of "Wiggly Bridge" from Playing Field to island site of old bunkhouses from NE.

NY\_Ulster Co\_Ashokan Field Campus\_0035  
View of island site of old bunkhouses from east.

NY\_Ulster Co\_Ashokan Field Campus\_0036  
View of The Homestead (#27) from NE.

Ashokan Field Campus Historic District  
Name of Property

Ulster, New York  
County and State

NY\_Ulster Co\_Ashokan Field Campus\_0037

View of The Homestead (#27) from SW with barn foundation and milk house in foreground.

NY\_Ulster Co\_Ashokan Field Campus\_0038

View of Writer's Cabin (#28) from SW.

NY\_Ulster Co\_Ashokan Field Campus\_0039

View of Campsite (#29) from SE.

NY\_Ulster Co\_Ashokan Field Campus\_0040

View of stone quarry site on trail on west side of creek.

NY\_Ulster Co\_Ashokan Field Campus\_0041

View of log chute/ski slope from north.

NY\_Ulster Co\_Ashokan Field Campus\_0042

View of old road/trail.

NY\_Ulster Co\_Ashokan Field Campus\_0043

View of New Bunkhouses I & II (#30 & #31), right to left, from west.

NY\_Ulster Co\_Ashokan Field Campus\_0044

View of New Bunkhouse III (#32) from SE.

NY\_Ulster Co\_Ashokan Field Campus\_0045

View of New Bunkhouse IV & Dining Hall (#33) from south.

**Paperwork Reduction Act Statement:** This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C.460 et seq.).

**Estimated Burden Statement:** Public reporting burden for this form is estimated to average 18 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Office of Planning and Performance Management, U.S. Dept. of the Interior, 1849 C. Street, NW, Washington, DC.



Ashokan Field Campus Historic District  
Name of Property

Ulster, New York  
County and State



Ashokan Field Campus Historic District Photo Key



Ashokan Field Campus Historic District  
Name of Property

Ulster, New York  
County and State

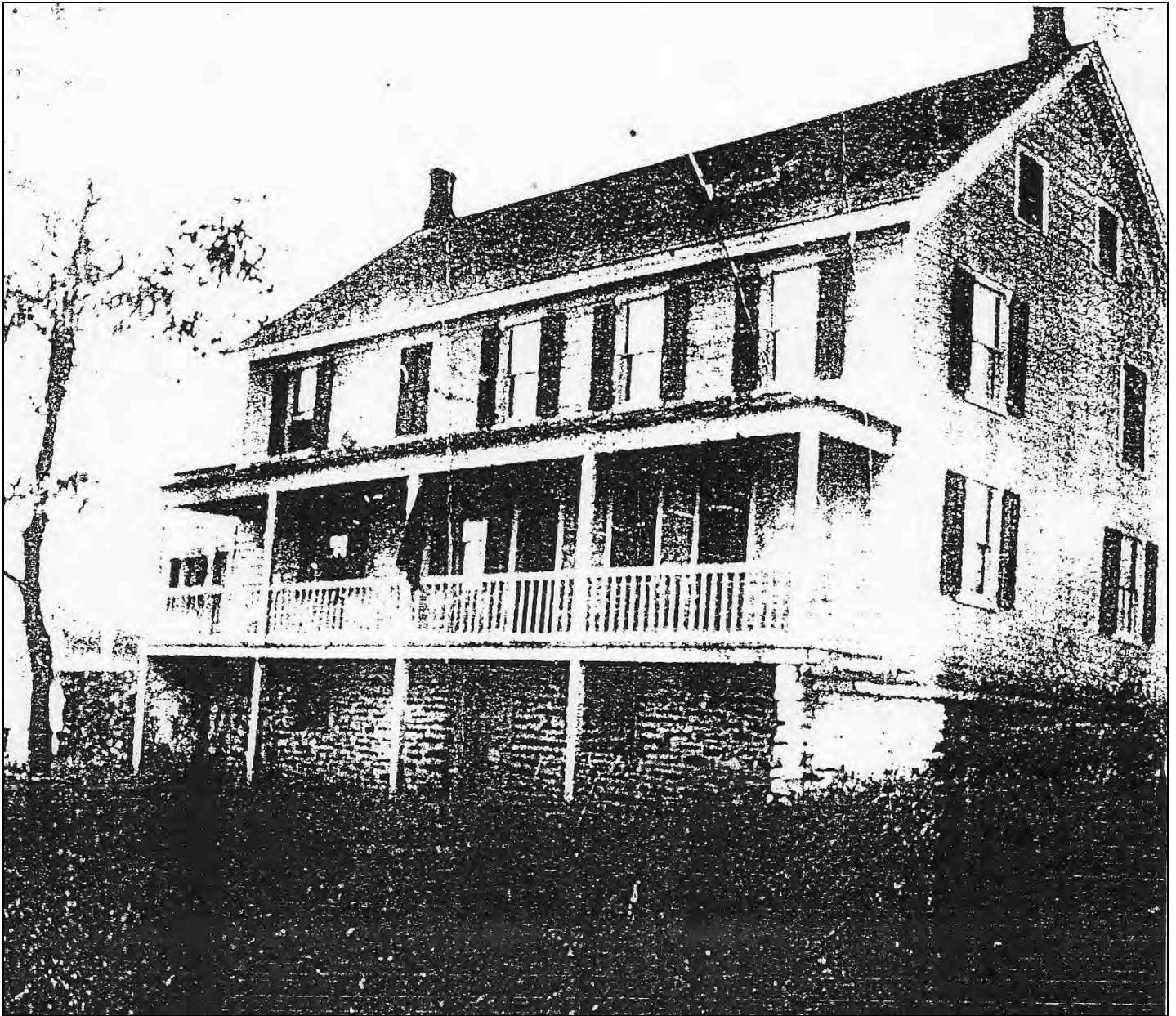


Fig.1: Historic view of Winchell House from NE prior to renovations made by Lester A. and Barbara L. Moehring in 1937. From Ashkan Center Archives.

Ashokan Field Campus Historic District  
Name of Property

Ulster, New York  
County and State



Fig.2: View of Winchell-Moehring House from NW, ca. 1959.



Fig.3: View of Winchell-Moehring House, ca. 1975. From Vera Van Steenberg Sickler, *The Town of Olive Through the Years, Part One* (1976).



Ashokan Field Campus Historic District  
Name of Property

Ulster, New York  
County and State



Fig.4: View of Eastern Dynamite Co., formerly Hudson River Pulp & Paper Mfg. Co., ca; 1906. Winchell-Moehring House on horizon with unidentified house or office below it on right. From Vera Van Steenberg Sickler, *The Town of Olive Through the Years, Part One* (1976).



Fig.5: View of Eastern Dynamite Co., formerly Hudson River Pulp & Paper Mfg. Co., ca; 1906.



Ashokan Field Campus Historic District  
Name of Property

Ulster, New York  
County and State



Fig.6: View of Turnwood Covered Bridge after relocation to Ashokan in ca. 1940. From Vera Van Steenberg Sickler, *The Town of Olive Through the Years, Part One* (1976).



Fig.7: Concrete marker at Turnwood Cover Bridge. From Phase 1 Cultural Resource Survey, Ashokan Field Campus Demolition Project Town of Olive, Ulster County, New York, November 30, 2012.



Ashokan Field Campus Historic District  
Name of Property

Ulster, New York  
County and State



Fig. 8: View of Stone Schoolhouse in its original location in town of Olive before being moved to Ashokan Field Campus. From Vera Van Steenberg Sickler, *The Town of Olive Through the Years, Part One* (1976).



Fig. 9: View of SUNY New Paltz Ashokan Field Campus Bunkhouses prior to demolition in 2012. From Phase 1 Cultural Resource Survey, Ashokan Field Campus Demolition Project Town of Olive, Ulster County, New York, November 30, 2012.





















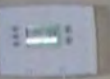


e.

THE HISTORY OF THE  
CITY OF BOSTON  
FROM 1630 TO 1800  
BY JOHN H. COOPER  
PUBLISHED BY THE  
GEO. B. BROWN CO.  
NEW YORK





























































































































































National Register of Historic Places  
Memo to File

# Correspondence

The Correspondence consists of communications from (and possibly to) the nominating authority, notes from the staff of the National Register of Historic Places, and/or other material the National Register of Historic Places received associated with the property.

Correspondence may also include information from other sources, drafts of the nomination, letters of support or objection, memorandums, and ephemera which document the efforts to recognize the property.

UNITED STATES DEPARTMENT OF THE INTERIOR  
NATIONAL PARK SERVICE

NATIONAL REGISTER OF HISTORIC PLACES  
EVALUATION/RETURN SHEET

Requested Action: Nomination

Property Name: Ashokan Field Campus Historic District

Multiple Name: \_\_\_\_\_

State & County: NEW YORK, Ulster

Date Received: 3/4/2019      Date of Pending List: 3/21/2019      Date of 16th Day: 4/5/2019      Date of 45th Day: 4/18/2019      Date of Weekly List: \_\_\_\_\_

Reference number: SG100003622

Nominator: SHPO

Reason For Review: \_\_\_\_\_

X Accept       Return       Reject      4/16/2019 Date

Abstract/Summary Comments: The Ashokan Field Campus is eligible for listing in the National Register. There are numerous distinct periods of significance; the settlement period, the industrial period, and the educational camp period. Resources remain for all periods but the resource currently reflects the current use, that of a educational field camp. The resource was developed and evolved over the years to educate students and teachers about nature, how things are made, and getting in touch with the past, and being part of the bigger world. The education philosophies over the decades felt there has been a disconnect with the past, with nature, and too much learning in the classroom. The camp was developed to bring students and teachers back to the bigger world and out of the classroom. Besides seeing the remains of industry, buildings were moved to the site to be used for crafts, etc. A beach and ball field were built for students and teachers who spent most of their lives in cities to get experience nature. There have been some changes but there overall the site has integrity to the period of significance.

Recommendation/ Criteria: \_\_\_\_\_

Reviewer: Alexis Abernathy      Discipline: Historian

Telephone: (202)354-2236      Date: 4/16/2019

DOCUMENTATION:    see attached comments : No    see attached SLR : No

If a nomination is returned to the nomination authority, the nomination is no longer under consideration by the National Park Service.



# FLORENTINE FILMS

Ken Burns

December 4, 2018

Jennifer Betsworth  
NYS Office of Parks, Recreation and Historic Preservation  
625 Broadway  
Albany NY 12207

Dear Ms. Betsworth:

I'm writing in support of the nomination of the Ashokan Field Campus Historic District and to urge the State Board for Historic Preservation to support Ashokan's listing in the State and National Registers of Historic Places.

The Ashokan Field Campus name was changed to the Ashokan Center in 2008, but the programs and mission remain the same. To teach, inspire and build community through shared experiences in nature, history and the arts.

Important features of the history of the Catskill region are clearly represented at Ashokan: from the colonial period, through an agricultural era, to the industrial revolution—a brief period when the property was mostly a recreational site—to Ashokan's role in pioneering outdoor and environmental education in New York State more than fifty years ago.

Children especially, but also adults, are transformed by the experiences in nature that Ashokan offers. And when they return home, they carry something of the power of nature back with them and become citizens of nature, sharing these experiences with their families and friends. They become lifelong advocates for the preservation of natural open spaces, to keep them unsullied by encroaching development. The Ashokan Center has been offering life-changing outdoor and environmental education programs for schools since 1967. Each year thousands of children gain direct access to nature at Ashokan, some for the very first time.

While of course smaller and more intimate than the Grand Canyon or Yosemite, Ashokan is just as important given the transformative effect when you experience the crunch of leaves under your feet, hear the sound of a brook, observe wildlife—things shared by thousands and thousands of children, families and adults of all ages and backgrounds each year.

Ashokan also offers formative firsthand experiences that make history come alive. For instance, students hike across Esopus Creek on the 1885 Covered Bridge that bears a sign that reads, “Ten Dollar Fine for Driving Faster Than a Walk.” They’re then encouraged to ask what the sign means and learn about the etymology of the word “drive,” and they find out that it’s about driving your team of horses faster than a walking pace.

On the other side of the Esopus they follow a beautiful woodland trail to the 1830 Homestead. Rather than peering in over a velvet rope, they’re met by educators in period dress who welcome them in and show them how to build a fire in the open hearth and cook their lunch in a Dutch oven. In early spring students hike to the Maple Sugar Shack, where they gather sap in buckets, boil it down to syrup and learn how native peoples pioneered this process and taught it to the colonists.

Then there’s the Cathedral Gorge hike where students learn about forest succession and see 385 million years of geological history preserved in the gorge walls.

These are just a few of the compelling learning experiences that students and adults alike are able to share at Ashokan. The poet William Blake said that you could find the world in a grain of sand. And just as the cosmos is configured as the atom, so too we can find at Ashokan anything we may want to know about life.

Sincerely,

A handwritten signature in black ink that reads "Ken Burns". The signature is written in a cursive, flowing style with a large initial "K" and "B".

Ken Burns



November 30, 2018

Jennifer Betsworth  
Historic Preservation Specialist  
NYS Office of Parks, Recreation and Historic Preservation

Re: Ashokan Field Campus Historic District

Dear Ms. Betsworth:

I am writing to voice my strong support for the nomination of the Ashokan Field Campus Historic District and urge the State Board for Historic Preservation to support its listing on the State and National Registers of Historic Places.

As past President of the Open Space Institute, I worked hand-in-hand with the Ashokan Center to acquire the property some ten years ago and then initiate a disposition plan that included conveying a portion of the property to New York City and a portion to the Ashokan Center while ensuring that the entire property could continue to be used for environmental and cultural education purposes. In the course of two or more years of negotiation, I became intimately familiar with the property, its past use and the vision for its continued use as an environmental and cultural education center.

In 2011, Governor Cuomo appointed, and the State Senate confirmed me as Commissioner of the NYS Department of Environmental Conservation. From my post at DEC, I followed with interest the sensitive restoration and development of the Field Campus to support its wide variety of educational programs. As a result of this effort, now more than ever the Center is a unique combination of historic buildings and artifacts, rustic housing, and fields and forests that provide a unique and enduring educational setting. It is a magical place that deserves its place on the National and State Historic Registers.

Since 1967, virtually every acre of the Ashokan Center property: fields, forests, streams, barns, covered bridge, and architectural ruins, have been used for outdoor education and living history programs. Many school children from throughout the region experience nature for the first time and through the living history programs they experience 18<sup>th</sup> and 19<sup>th</sup> century folkways, lifestyles and culture in the colonial craft shops, 1817 schoolhouse, 1830 homestead, the John Burroughs Writers Cabin and the Maple Sugar Shack. The mill dam and mill site ruins provide an opportunity to learn about an era when water was king. And on a streamside trail along the Esopus Creek, children see first-hand a 385 million-year-old geological record in the walls of the Cathedral Gorge as well as forest succession. The Ashokan property has provided a unique setting for rich cultural learning and life-changing experiences and memories for more than 50 years and will do so for years to come.

It should be recognized and proudly added to the National and State Registers. Thank you for considering my letter of support

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Martens". The signature is fluid and cursive, with a large initial "J" and "M".

Joe Martens  
32 Placid Lane  
Glenmont, New York 12077



**From:** Tim Jensen  
**To:** [Betsworth, Jennifer \(PARKS\)](#)  
**Subject:** Letter in support of the Ashokan Center's designation as a Historic District  
**Date:** Sunday, December 02, 2018 6:36:42 PM

---

*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

Dear Ms. Betsworth -

I am a Fourth Grade elementary school teacher at The Packer Collegiate Institute in Brooklyn, NY, a school which was established in 1845 and is Brooklyn's oldest private school.

I am writing to strongly support the Ashokan Center's nomination as a Historic District.

Each year for the past ten years Packer has sent its entire Fourth Grade - 66 nine-year-olds - to the Ashokan Center for a four-day, three-night stay in October. We do so in support of our social studies curriculum, which studies colonial life in New York. At Ashokan our students are able to experience blacksmithing, tin smithing, broom making, cider pressing, baking corn bread over a hearth fire, and "learning" in an old one-room school house. They can see the remains of a mill dam and water mill site, and walk across a covered bridge.

These experiences are impossible to provide in New York City, and the annual trip to Ashokan deepens and strengthens our curriculum in ways that students remember for years afterward.

I cannot highly enough praise Ashokan Center for the important work it has done and will continue to do for countless students at Packer Collegiate and many, many other schools. We treasure our visits there, and hope that Ashokan will continue to operate for years to come.

I support without any reservation the Ashokan Center's nomination as a Historic District. Should you have any questions about this, I would be glad to speak further, and can best be contacted by e-mail, or by phone at 917-623-7312.

Thanks for considering this letter in support of Ashokan Center!

Tim Jensen  
Fourth Grade Teacher  
Packer Collegiate Institute, Brooklyn, NY



January 22, 2019

**Vincent Sapienza, P.E.**  
*Commissioner*

**Paul V. Rush, P.E.**  
Deputy Commissioner  
Bureau of Water Supply  
prush@dep.nyc.gov

P.O. Box 358  
Grahamsville, NY 12740  
T: (845) 340-7800  
F: (845) 334-7175

Joy Beasley  
Keeper of the National Register  
Associate Director of Cultural Resources  
Department of the Interior - National Park Service  
1849 C Street, NW – Mail Stop 7228  
Washington, DC 20240

Julie H. Ernstein, Ph.D., RPA  
Acting Chief, National Register & National Historic Landmarks Program  
Deputy Keeper of the National Register  
Department of the Interior - National Park Service  
1849 C Street, NW – Mail Stop 7228  
Washington, DC 20240

Re: The Ashokan Field Campus Historic District National  
Register Nomination

Dear Ms. Beasley and Ms. Ernstein:

The New York City Department of Environmental Protection (DEP) submits this comment letter in regards to the New York State Historic Preservation Officer's (SHPO) nomination of The Ashokan Field Campus Historic District's (District) for listing in the National Register of Historic Places. As the agency responsible for delivering high quality and plentiful water to half the population of New York State, DEP respectfully requests that in the Department of the Interior's (DOI) review of this nomination, it consider the vital role of DEP's infrastructure located within the bounds of the District. DEP is mindful of the need to preserve historical resources, while ensuring it has the required flexibility to utilize its assets that fall within the District.

New York City's water supply system, which is one of the oldest, largest and most complex surface water supplies in the world, is comprised of three separate reservoir systems: the Croton, the Catskill and the Delaware. DEP, as the operator of the system, provides an average of 1.1 billion gallons of water to nine million New York City residents and visitors in addition to one million residents living north of the City in Orange, Putnam, Ulster, and Westchester counties.



The District falls within the Catskill water supply system and encompasses property and critical water supply assets owned by New York City. In particular, the Ashokan Release Channel (ARC) runs through two DEP-owned parcels that comprise a portion of the District. As explained below, ARC is an important asset in enabling DEP to operate the Catskill system as an unfiltered supply, in compliance with the federal Safe Drinking Water Act and Surface Water Treatment Rule (SWTR), and it is imperative that DEP has the continued flexibility to operate and adjust ARC as needed to ensure the water supply system remains in compliance with these laws.

ARC is a concrete canal, constructed in the early 1900s, that is used to convey water from the Ashokan Reservoir—currently up to 600 million gallons per day—in a controlled manner from the reservoir through the upper and lower gate chambers to the Old Esopus Creek. DEP's strategic use of ARC enables it to address water quality concerns that can arise during, and following, intense storm events. In addition, ARC can be used proactively to benefit the surrounding communities by enabling DEP to create a void in the Ashokan Reservoir upstream of ARC, thus making room in the Ashokan Reservoir to capture additional flows before a large storm event or when seasonal runoff is expected to be high. For these reasons, DEP's continued use of ARC assists DEP in ensuring the delivery of high quality water during such events, as well as complying with the stringent federal and state requirements to maintain an unfiltered supply.

DEP and the City of New York have a deep appreciation for the preservation of historically significant properties. That said, DEP also has concerns about the inclusion of the City's property as part of the District. See attached letter of objection and comments articulating these concerns, which DEP submitted to SHPO on November 8, 2018 (SHPO Comments). DEP requests that DOI and the Keeper be mindful of these concerns in reviewing the District's nomination. In the event DOI and the Keeper determine that the District is eligible and/or approved for listing, DEP urges DOI and the Keeper to consider revising and limiting the boundary line of the District before making such determination, as suggested by DEP in the SHPO Comments. Alternatively, in the event DOI and the Keeper determine the District to be eligible and/or confirmed for listing with the boundary line as-is, then DEP requests that DOI and the Keeper recognize, in making this determination, the critical role of ARC and the City's need for flexibility in its future use, despite its location within the District.

Thank you for your time and consideration in this matter.

Sincerely,



Paul V. Rush, P.E.

Deputy Commissioner

c: Rose Harvey, State Historic Preservation Officer  
Daniel Mackay, Deputy State Historic Preservation Officer  
David Warne, DEP Assistant Commissioner, Bureau of Water Supply  
Robin Levine, DEP, Bureau of Legal Affairs  
Casey McCormack, DEP, Bureau of Legal Affairs  
Daniel Mulvihill, DEP, Bureau of Legal Affairs



**Attachment**

SHPO Comments - November 8, 2018



November 8, 2018

**Vincent Sapienza, P.E.**  
*Commissioner*

**Paul V. Rush, P.E.**  
Deputy Commissioner  
Bureau of Water Supply  
prush@dep.nyc.gov

P.O. Box 358  
Grahamsville, NY 12740  
T: (845) 340-7800  
F: (845) 334-7175

**Commissioner Rose Harvey**  
New York State Historic Preservation Officer  
Commissioner of Parks, Recreation and Historic Preservation  
P.O. Box 189  
Waterford, NY 12188

**Deputy Commissioner R. Daniel Mackay**  
Deputy Commissioner for Historic Preservation  
Deputy State Historic Preservation Officer  
NYS Parks, Recreation and Historic Preservation  
P.O. Box 189  
Waterford, NY 12188

**Re: The Ashokan Field Campus Historic District**  
477 Beaverkill Road,  
Olive Bridge, NY 12461  
Ulster County

Dear Commissioner Harvey and Deputy Commissioner Mackay:

I am writing on behalf of the City of New York ("City") and the New York City Department of Environmental Protection ("DEP") who hereby object to and comment on the designation and listing of the "Ashokan Field Campus Historic District" ("Proposed District") in the National and New York State Registers of Historic Places in accordance with 36 CFR §60.6(g) and 9 NYCRR §427.4 respectively.

The Proposed District spans three parcels in Ulster County, New York, two of which are owned by the Ashokan Foundation, Inc. ("AFI Parcels"), one of which is owned by the City, by and through DEP ("DEP Parcel"). On August 21, 2018, DEP received a notice letter from Deputy Commissioner Mackay ("Notice Letter") that stated the Proposed District was being considered by the New York State Board of Historic Preservation for listing in the National and State Registers of Historic Places, and that the DEP Parcel was one of the properties comprising the Proposed District. DEP Assistant Commissioner Dave Warne subsequently requested a copy of the National Register of Historic Places Registration Form that was submitted to your office nominating the Proposed District for listing consideration ("Nomination Application"), for DEP's review and comment, which he received from your office via email on August 30, 2018. On September 10, 2018, DEP requested via letters and emails addressed to each of you that the State Board's consideration of the Proposed District be postponed in accordance with 9 NYCRR 427.4(d) to allow DEP additional time to review the Nomination Application and prepare comments thereto. Division Director Michael F. Lynch notified DEP via email on September 11, 2018 that Deputy



Commissioner Mackay had granted DEP's request for extension to November 9, 2018, to which he attached a signed letter from the Deputy Commissioner effectuating same ("Extension Letter").

Upon further review of the Nomination Application in conjunction with all applicable federal and state law, and supplemental technical guidance bulletins published by the National Parks Service, DEP, acting on behalf of the City as the sole fee simple owner of the DEP Parcel, hereby formally objects to the nomination and listing of the Proposed District in the National Register of Historic Places pursuant to 36 CFR §60.6(g), and in particular, to the inclusion of the DEP Parcel within the Proposed District's boundary line.

DEP submits the attached comments to the Nomination Application ("Comments") in accordance with 9 NYCRR §427.4, and consistent with the submission requirements noted in the Deputy Commissioner's Extension Letter dated September 11, 2018. As further detailed in the attached Comments, DEP contests the eligibility of the Proposed District for listing in both the State and National Registers of Historic Places for the following reasons:

- I. The boundary of the Proposed District is too large and thus is improper for listing in both the National and State Registers as proposed;
- II. The integrity of a majority of the Proposed District's contributing resources have been compromised, and the Applicant has not properly discussed or demonstrated that these contributing resources individually and/or collectively qualify the Proposed District for any of the Criteria Considerations enumerated in 36 CFR §60.4;
- III. Due to the aforementioned contributing resource integrity issues, the historic significance of the Proposed District is compromised, thereby negating the Proposed District's eligibility for listing; and
- IV. The Nomination Application as submitted is incomplete, lacks a substantial amount of required discussion and information, and contains numerous inconsistencies, and therefore should be deemed incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time.

DEP respectfully requests that the SHPO and the State Board carefully consider the attached Comments in conjunction with their review(s) of the Nomination Application, and collectively conclude that, based upon the current state of the Nomination Application, the Proposed District is ineligible for listing in the National and State Registers.

Please confirm your timely receipt of this letter and the enclosed Comments. Thank you for your time and consideration.

Sincerely,



Paul V. Rush, P.E.  
Deputy Commissioner

- c: **Michael Lynch, Division Director, NYS Division for Historic Preservation**
- David Warne, Assistant Commissioner, DEP Bureau of Water Supply**
- Casey McCormack, Assistant Counsel DEP Bureau of Legal Affairs**
- Daniel Mulvihill, Senior Environmental Counsel, DEP Bureau of Legal Affairs**
- Robin Levine, Senior Environmental Counsel, DEP Bureau of Legal Affairs**

TERESA AMERSON  
Assistant Secretary for  
Public Safety  
New York State Office of  
General Services



**ACKNOWLEDGEMENT**

STATE OF NEW YORK

SS:

COUNTY OF Sullivan

On the 8<sup>th</sup> day of November in the year 2018 before me, the undersigned, personally appeared **PAUL V. RUSH**, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed same in his capacity, and that by his signature on the within instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

*Pamela Zanetti*

Notary Public

Printed Name: Pamela Zanetti

My Commission Expires:

8/31/22

**PAMELA ZANETTI**  
Notary Public, State of New York  
Residing in the County of Sullivan  
Commission Expires Aug. 31, ~~2018~~ 2022  
Reg. No. 01ZA4714481

**COMMENTS ON THE ASHOKAN FIELD CAMPUS HISTORIC DISTRICT  
NOMINATION APPLICATION TO  
THE STATE & NATIONAL REGISTERS OF HISTORIC PLACES**

**Background**

The City of New York (“City”) and the NYC Department of Environmental Protection (“NYCDEP”) (the City and NYCDEP shall hereinafter collectively be referred to as “DEP”) in accordance with 9 NYCRR §427.4, jointly submit this written statement containing DEP’s comments on the National Register of Historic Places Registration Application prepared by Larson Fisher Associates, Inc. (“Applicant”) nominating the Ashokan Field Campus Historic District (“Proposed District”) for concurrent listing in the New York State and National Registers of Historic Places (“Nomination Application”). The Proposed District is comprised of three parcels located in Ulster County, New York, two of which are owned by the Ashokan Field Institute, Inc. (“AFI Parcels”), and one of which is owned by DEP (“DEP Parcel”). As further explained in the Comments below, DEP believes the Proposed District is ineligible for listing in both the State and National Registers for the following reasons:

- I. The boundary of the Proposed District is too large and thus is improper for listing in both the National and State Registers as proposed;
- II. The integrity of a majority of the Proposed District’s contributing resources have been compromised, and the Applicant has not properly discussed or demonstrated that these contributing resources individually and/or collectively qualify the Proposed District for any of the Criteria Considerations enumerated in 36 CFR §60.4;
- III. Due to the aforementioned contributing resource integrity issues, the historic significance of the Proposed District is compromised, thereby negating the Proposed District’s eligibility for listing; and
- IV. The Nomination Application as submitted is incomplete, lacks a substantial amount of required discussion and information, and contains numerous inconsistencies, and therefore should be deemed incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time.

DEP respectfully requests that the New York State Board of Historic Preservation, the New York State Historic Preservation Officer, the National Parks Service and the Keeper of the National Register of Historic Places carefully consider these comments in conjunction with the Nomination Application, and respectively conclude that the Proposed District is ineligible for listing in the National and State Registers at this time.

**Comments**

DEP offers the following comments in support of its position that the Proposed District is ineligible for listing in the State and National Registers at this time:



**I. The boundary of the Proposed District is too large and thus is improper for listing in both the National and State Registers as proposed;**

**A. Governing Regulations & NPS Technical Guidance**

36 CFR §60.3 defines a “District” as “a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history.”<sup>1</sup> The National Register Bulletin No. 15, *How to Apply the National Register Criteria for Evaluation* (“NRB 15”) further contextualizes this definition by stating: “A district derives its importance from being a unified entity ... [it] must be a definable geographic area that can be distinguished from surrounding properties by changes such as density, scale, type, age, style of sites, buildings, structures, and objects, or by documented differences in patterns of historic development or associations. It is seldom defined, however, by the limits of current parcels of ownership, management or planning boundaries. The boundaries must be based upon a shared relationship among the properties constituting the district.”<sup>2</sup>

Section 10 of the National Register Registration Application Form requires applicants to include a Boundary Justification statement that provides an explanation of the reasons for the applicant’s selection of the proposed boundary for the nominated historic property or district.<sup>3</sup> National Register Bulletin No. 16A, titled *How to Complete the National Register Registration Form* (“NRB 16A”), further explains the required level of detail to be included in the justification statement, and specifically notes that “Properties with substantial acreage require more explanation than those confined to small city lots.”<sup>4</sup> In addition, NRB 16A lists the following guidelines for applicants to review and consider while choosing an appropriate boundary line for a property or district:

**1. For All Properties:<sup>5</sup>**

- a. Carefully select boundaries to encompass, but not exceed the full extent of the significant resources and land area making up the property.

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<sup>1</sup> 36 CFR §60.3. *Note*, in the instant case, the Proposed District has been concurrently nominated for listing in both the State and National Registers. Pursuant to 9 NYCRR §427.1(a), in the event of a concurrent listing proposal, review for listing in the State register shall primarily be done in accordance with the National Register nomination review process: “(a) Except as provided for in subdivision (b) of this section, all proposals for the listing of properties on both the National Register and State Register shall be submitted, reviewed and acted upon in accordance with the regulations governing the *National Register* (emphasis added) ...”. Unless specifically noted otherwise herein, all analyses discussed in this document will have been undertaken and performed through the lens of the applicable federal regulatory analysis mechanisms as required by 36 CFR Part 60, and also in compliance with 9 NYCRR §427.1.

<sup>2</sup> *See*, National Register Bulletin No. 15, *How to Apply the National Register Criteria for Evaluation*: <https://www.nps.gov/nr/publications/bulletins/nrb15/>, p. 5-6 (hereinafter “NRB 15”).

<sup>3</sup> *See*, National Register Bulletin No. 16A, *How to Complete the National Register Registration Form*, <https://www.nps.gov/nr/publications/bulletins/nrb16a/>, p. 54-57, Appendix IV:I (hereinafter “NRB 16A”).

<sup>4</sup> *Id.* at 55

<sup>5</sup> *Id.* at 56

- b. The area to be registered should be large enough to include all historic features of the property, but should not include “buffer zones” or acreage not directly contributing to the significance of the property.
  - c. Leave out peripheral areas of the property that no longer retain integrity, due to subdivisions, development or other changes.
2. *Specifically For Historic Districts:*<sup>6</sup> Select boundaries to encompass the single area of land containing the significant concentration of buildings, sites, structures, or objects making up the district. The district's significance and historic integrity should help determine the boundaries. Consider the following factors:
- a. Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character.
  - b. Visual changes in the character of the area due to different architectural styles, types or periods, or to a decline in the concentration of contributing resources.
  - c. Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch.
  - d. Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.

**B. Analysis & Application to Proposed District**

The Proposed District in this instance spans 359.82 acres, and the boundary is explained by the Applicant in the Boundary Justification portion of the Nomination Application’s Section 10 as follows: “The boundary was drawn to encompass the tract assembled by the New York State Teachers College at New Paltz for the Ashokan Field Campus in 1957.”<sup>7</sup>

Immediately following Section 10 are four aerial maps of the Proposed District, which have been collectively attached hereto as Exhibit “A” for your review in conjunction herewith. The first three maps depict the outer boundary points of the Proposed District as viewed from various heights and scales, all of which are clearly measurable and discernable using the informational keys provided at the bottom of each of the respective maps.<sup>8</sup> The fourth map/site plan, titled, “Ashokan Field Campus Historic District Site Plan” (“Site Plan”), is an unscaled aerial photograph showing a small fraction of the acreage comprising the Proposed District. The exact amount of acres and scale of this Site Plan is unascertainable given the information provided by

<sup>6</sup> *Id.* at 56-57

<sup>7</sup> Nomination Application p. 29.

<sup>8</sup> DEP understands and acknowledges that these three maps were included in the Applicant’s Nomination Application to fulfill the Verbal Boundary Description requirements of Section 10.



the Applicant. However, DEP staff familiar with the property confirmed upon review that the Site Plan did in fact depict a small, concentrated area within the Proposed District boundary that is home to a large majority of the Nomination Application's listed complying and non-complying structures, sites and buildings ("Site Plan Area").<sup>9</sup> In addition, the Applicant also included a fifth aerial map/photograph, titled "Ashokan Field Campus Historic District Photo Key" on page 38 of the Nomination Application, which is attached hereto as Exhibit "B" and attempts to numerically depict the approximate locations of all of the contributing and non-contributing resources found throughout the Proposed District.<sup>10</sup> As was the case with the preceding Site Plan, this fifth aerial image also fails to disclose the amount of acreage shown in the photo or the scale/height at which the image was taken. In addition it fails to show the greater boundary line of the Proposed District in relation to the concentration of contributing and noncontributing resources labeled numerically thereon.

In an effort to better understand the boundary of the Proposed District in conjunction with the location of the concentration of contributing and noncontributing resources discussed in the Nomination Application, DEP composed an aerial map of the Proposed District using its in-house Geographic Information Systems technology. This map, which is attached hereto as Exhibit "C", shows, among other things, the total boundary lines of the 359.82-acre Proposed District, as well as the general location of the Site Plan Area referenced above.<sup>11</sup> A plain review of this map supports the conclusion that the boundary of the Proposed District far exceeds the concentrated Site Plan Area. In addition, when this map is viewed alongside the Applicant's fifth aerial image attached hereto as Exhibit "B", DEP's position that the contributing and noncontributing resources are concentrated in a specific, smaller area of the Proposed District, is only further reinforced.

As aforementioned in the Governing Regulations & NPS Technical Guidance Section above, a District is "a geographically definable area ... possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development."<sup>12</sup> DEP acknowledges that a *portion* of the Proposed District may be a geographically definable area possessing a significant concentration of sites, buildings, structures, or objects; however notwithstanding, DEP contests the overall boundary of the Proposed District as labeled and justified in Section 10 for the following reasons:

1. The Proposed District's boundary and the encompassing 359.82-acre geographic area is too expansive and as such, is not distinguishable from surrounding properties by changes such as density, scale, type, age, style of

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<sup>9</sup> *Id.* at 33.

<sup>10</sup> *Id.* at 38. Note, DEP takes issue with the overall accuracy and numerical formatting used in this map, which it discusses at greater length in Section IV of these Comments.

<sup>11</sup> Due to the lack of information provided in support of the Site Plan, the exact range and acreage of the Site Plan Area could not be depicted on DEP's attached map. Instead, DEP has circled the general Site Map Area in red on its map for your reference and review.

<sup>12</sup> 36 CFR §60.3

sites, buildings, structures, and objects.<sup>13</sup> In fact, the opposite is true. A large portion of the Proposed District is vacant and contains no evidence of historical remnants. Instead these areas are likely nothing more than densely forested woods that house no contributing or noncontributing sites, buildings, structures or objects. As the Applicant noted itself on page 3 of the Nomination Application, “most of the property is second growth forest.”

2. The Applicant’s boundary justification fails to sufficiently explain the extensive 359.82-acre boundary line of the Proposed District as encouraged by NRB 16A.<sup>14</sup> There are substantial portions of the Proposed District that are indistinguishable with no evidence of significance, and as such, arguably amount to nothing more than improper acreage buffer zones. Without further explanation from the Applicant in the Boundary Justification as to why these additional vacant acres should be included in the Proposed District, the Boundary Justification is insufficient.
3. The forested, indistinguishable areas of the Proposed District lack integrity, stemming from the 2008 tract sale and subsequent subdivision into three parcels whereby DEP acquired ownership of the central parcel for purposes of operation of the NYC Water Supply System, and the Ashokan Field Institute, Inc. acquired the remaining two buffering parcels.

### **Section I Conclusion**

For the reasons set forth above, DEP believes that the boundary of the Proposed District is excessive and as such cannot be included in the National and State Registers at this time.

- II. The integrity of a majority of the Proposed District’s contributing resources have been compromised, and the Applicant has not properly discussed or demonstrated that these contributing resources individually and/or collectively qualify the Proposed District for any of the Criteria Considerations enumerated in 36 CFR §60.4;**

#### **A. Governing Regulations & NPS Technical Guidance**

The “Criteria Considerations” section of 36 CFR §60.4 lists certain types of properties that ordinarily, due to their nature, will not be considered or deemed eligible for listing. Properties on this list include, but are not limited to:

- i. Structures that have been moved from their original locations,
- ii. Reconstructed historic buildings, and/or
- iii. Properties primarily commemorative in nature.<sup>15</sup>

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<sup>13</sup> See NRB 15 p. 5-6.

<sup>14</sup> NRB 16A at 55

<sup>15</sup> See 36 CFR §60.4



However, 36 CFR §60.4 goes on to list limited, “special circumstances” also known as “criteria considerations”, which operate to requalify these ordinarily ineligible properties for listing despite their disqualifying properties:

“such properties will qualify if they are integral parts of districts that do meet the criteria of [*sic*]<sup>16</sup> if they fall within the following categories:

- a. ...
- b. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- c. ...
- d. ...
- e. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- f. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance ....”<sup>17</sup>

NRB 15 further clarifies that “the Criteria Considerations need to be applied only to *individual* properties. Components of eligible districts do not have to meet the special requirements unless they make up the majority of the district or are the focal point of the district.”<sup>18</sup>

NRB 16A instructs applicants to complete the Criteria Considerations portion of Section 8 of the National Register Registration Application as follows:

“Mark an ‘x’ in the box for any criteria consideration applying to the property. Mark all that apply. Leave this section blank if no considerations apply ... For **districts**, mark only the criteria considerations applying to the entire district or to a predominant resource or group of resources within the district.”<sup>19</sup>

## **B. Analysis & Application to Proposed District**

The Applicant included a narrative description of each contributing and noncontributing resource comprising the Proposed District in Section 5 of its Nomination

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<sup>16</sup> *Note*, this seems to be a drafting error that is contained in the most current version of regulation. Based on additional analysis of NRB 15 p. 25, DEP believes the word “of” as used here, should instead be replaced with the word “or”. In the event this interpretation is improper, DEP requests further interpretative guidance from the SHPO and/or the National Parks Service.

<sup>17</sup> *Id.* Note, DEP has only listed the portions of the regulatory exemptions herein that it believes could possibly apply to the Proposed District.

<sup>18</sup> NRB 15 at 25

<sup>19</sup> NRB 16A at 36

Application. However, upon review of applicable federal regulations and NPS technical guidance bulletins, DEP submits that a large number of the Proposed District's purported contributing resources do not qualify as such because their historic integrity has been compromised due to movement, reconstruction, and/or the nature of the property as primarily commemorative in nature.<sup>20</sup>

DEP hereby comments on the following contributing resources in the Proposed District and questions them for their historic integrity and/or significance:

1. **Winchell Moehring House** – this building has been substantially reconstructed and repurposed since it was first built in the 18<sup>th</sup> century. Most recently, in 2015, a metal roof was added to the building, which brings the building's historic integrity into question. In addition, although the building has been in continuous use since the 18<sup>th</sup> century, the types of uses and functional purposes of the structure have varied substantially over time and most of the uses do not directly relate to the operation of the Ashokan Field Campus.
2. **Moehring Barn** – this building has been reconstructed in the last 5 years. According to the description, in 2015, a metal roof was added, and later in 2017, solar panels were installed. Further, this building's uses have varied greatly over time.
3. **Wagon Shed** – a review of the attached photo of this structure indicates that it was possibly reconstructed through the addition of a metal roof and solar panels; however, it is worth noting that this work was not detailed in the description section of the Nomination Application.<sup>21</sup>
4. **Granary** – DEP questions when the concrete elevation of this building occurred as noted in Section 5. Based on the description provided, it is not evident whether the elevation was undertaken at the time the building was erected, or instead at some later date. Further, the description states that the building “was built ... following traditional models to develop a farmyard with buildings *typical of the 19<sup>th</sup> century period*” (emphasis added), which DEP believes, without additional detailed information, is indicative of a structure that is primarily commemorative in nature.
5. **Smokehouse** – the description states that the building “was built ... following *traditional models* to develop a homestead with buildings *typical of the 19<sup>th</sup> century period*” (emphasis added), which DEP believes, without additional detailed information, is indicative of a structure that is primarily commemorative in nature.

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<sup>20</sup> See generally 36 CFR §60.4 *Criteria Considerations (b),(e),(f)*

<sup>21</sup> Note, DEP had some issues identifying each structure based on the attached photos because the photos were not labeled.



6. **Winchell's Falls & Hudson River Pulp & Paper Mfg. Co. Dam and Mill Site** – DEP questions the historic integrity and significance of this resource as a contributing property. Based on the scant information provided in the Section 5 description, it is very unclear how this site, and its historical context, contribute and connect to the Proposed District.
7. **Ashokan – Turnwood Covered Bridge** – this site is presently on the National Register of Historic Places and as such is not counted towards the total count of contributing resources within the Proposed District. It is worth noting that this bridge was substantially reconstructed in 2016 under the direction and supervision of the Ashokan Center. DEP was not involved in the reconstruction project and is unaware of how the work could have or did impact the bridge's National Register listing status.
8. **Print Shop** – as noted in the Section 5 description, this structure was originally built for a law office in Tillson, New York (near New Paltz) and was subsequently moved to its current location by camp staff in 1970. DEP questions this structure's historic integrity as a structure moved from its original location, and as a potentially reconstructed historic building.
9. **Old Foundation, 19th century** – DEP questions the historic integrity and significance of this property as it relates to the historical context and operations of this Ashokan Field Campus Historic District. The description states: "cellar hole for an unknown building with stone walls on four sides believed to be associated with Lemuel Winchell. *The site has been partially disturbed by amateur excavations by campers over the years, but may retain some archaeological potential.*" This site description is vague and raises questions as to how this site qualifies as a contributing source. In addition, in light of the campers' amateur excavation activities, it is arguable that the site's historic integrity has been compromised.
10. **Picnic Pavilion** – the description provided for this structure is extremely vague and it is unclear how this structure contributes to the Proposed District's historic significance.
11. **Sauna** – the description provided for this structure is extremely vague and it is unclear how this structure contributes to the Proposed District's historic significance.
12. **Campsite** – the description provided for this structure is extremely vague and it is unclear how this structure contributes to the Proposed District's historic significance.

As noted in the Governing Regulations & NPS Technical Guidance portion of this Section, generally individual components of eligible districts do not have to be evaluated individually for their integrity and thereafter be found to individually meet the Criteria

Considerations special requirements. However, individual components of districts *will be* evaluated in this way when properties with compromised integrity and any applicable qualifying criteria components, make up the *majority* of the district or are the focal point of the district.<sup>22</sup> In such a case, the relevant criteria considerations potentially applicable the district and/or the district's majority resource group/properties should be acknowledged as such in Section 8, and the applicability should thereafter be discussed by the applicant.

In the instant case, DEP believes that a majority of the contributing properties that comprise the Proposed District have compromised integrity for one or more of the reasons discussed above. In light of this majority integrity issue, DEP questions the overall integrity of the Proposed District, and posits that the Applicant should have completed the Criteria Considerations portion of Section 8 of the Nomination Application in order to appropriately address these integrity issues. Failure of the Applicant to do so amounts to a serious substantive flaw in the Applicant's Nomination Application. Alternatively, the Applicant could have argued that one or more Criteria Considerations applied to the District as a whole; however, this was not done either. No portion of the Criteria Considerations were addressed by the Applicant in Section 8 of the Nomination Application.

### **Section II Conclusions:**

DEP questions the integrity of a majority of the Proposed District's contributing resources and hereby requests that the Applicant either reevaluate the Nomination Application and revise it accordingly to address the above mentioned integrity issues via Criteria Considerations, or alternatively, requests that the State Board and SHPO deny the Proposed District for listing in the National and State Registers at this time because a majority of the Proposed District's contributing resources as described in the Nomination Application have been shown to have compromised integrity without applicable Criteria Considerations.

### **III. Due to the aforementioned contributing resource integrity issues, the historic significance of the Proposed District is compromised, thereby negating the Proposed District's eligibility for listing; and**

#### **A. Governing Regulations & NPS Technical Guidance**

The portion of 36 CFR §60.4 titled "Criteria for Evaluation" states:

*"The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:*

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or

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<sup>22</sup> NRB 15 at 25



- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.”<sup>23</sup> (emphasis added)

NRB 15 further guides applicants and regulatory reviewers regarding the proper application of the Criteria for Evaluation to properties and districts:

“For a property to qualify for the National Register it must meet one of the National Register Criteria for evaluation by:

- Being associated with an important historic context, *and*
- Retaining historic integrity of those features necessary to convey its significance.”<sup>24</sup>

In regards to historic significance and integrity of districts and the properties that make up those districts, NRB 15 states:

“A district must be *significant* as well as being an identifiable entity. ... *the majority of the components that add to the district’s historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.* A district can contain buildings, structures, sites, objects, or open spaces that do not contribute to the significance of the district. *The number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district’s integrity*”<sup>25</sup> (emphasis added).

## **B. Analysis & Application to Proposed District**

As discussed in Section II above, DEP questions the integrity of approximately 12 of 17 of the Proposed District’s contributing resources<sup>26</sup>. In light of the Applicant’s failure to address these majority contributing resource integrity issues via discussion and appropriate marking of the Criteria Considerations portion of Section 8 of the Nomination Application, DEP does not think the remaining uncompromised contributing resources individually, or collectively as part of the Proposed District, retain enough historic significance under Criteria A or C as listed in 36 CFR §60.4.

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<sup>23</sup> See 36 CFR §60.4

<sup>24</sup> NRB 15 at 3

<sup>25</sup> *Id.* at 5

<sup>26</sup> Note, the reference to 17 contributing resources is derived from page 2, Section 5 of the Nomination Application. However, DEP is unsure of the total number of contributing resources proposed by the Applicant in the application because the total number (17) listed in Section 5, does not fully match up with the total number of contributing properties listed later in Section 7.

As NRB 15 states, *“the number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district’s integrity”*<sup>27</sup> The Applicant’s failure to rehabilitate the compromised integrity of the 12 contributing resources listed in Section II significantly impacts the District’s integrity as a whole. Once the 12 resources are removed as contributing resources and reallocated as noncontributing, the Proposed District overall is left with just a total of 5 contributing resources, and 26 noncontributing resources (12 of which are have integrity issues) which are all concentrated in one relatively distinct section of the 359.82-acre Proposed District. The only logical conclusion that can result is that the District’s overall integrity has been severely compromised, which in turn prevents the District from effectively conveying its sense of time, place, and historical development. As a result, the Proposed District is not historically significant and does not meet Criteria for Evaluation (a) and (c) as stated in the Nomination Application.

In addition, separate and apart from the integrity issue, is the fact that Period of Significance described by the Applicant in Section 8 (spanning 1785 – 1970) does not logically reflect or appropriately relate in any way to the boundary line justification in Section 10.<sup>28</sup> The applicant states the following as the justification for the chosen period of significance:

“The Period of Significance was drawn to encompass the varied and evolving history of the property. It begins with Lemuel Winchell’s ca. 1785 house, which may be located on earlier foundations, and extends until ca. 1970, when the majority of the buildings associated with the Ashokan Field Campus, a college-based outdoor education program, had been completed. The property has continued to function as a camp focused on the ecological and cultural history of the Catskills region to the present day.”<sup>29</sup>

DEP fails to see how the boundary line is justified or significant when compared against the Applicant’s period of significance statement. This analysis only further supports DEP’s position that the Proposed District is ineligible for listing at this time because the Applicant has failed to prove its significance, and has also failed to demonstrate that it is an identifiable entity based on its boundary lines and the resources contained therein.

### **Section III Conclusions**

For the above-listed reasons, the resource integrity issues discussed in Section II, and the improper boundary justification discussed in Sections I and III hereof, collectively detrimentally impact the Proposed District’s historic significance to such an extent that the District does not qualify for listing under Criteria for Eligibility (A) and (C) (36 CFR §60.4).

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<sup>27</sup> NRB 15 at 5

<sup>28</sup> See generally Nomination Application page 29, stating: “the boundary was drawn to encompass the tract assembles by the New York State Teachers College at New Paltz for the Ashokan Field Campus in 1957.”

<sup>29</sup> *Id.* at 12.



**IV. The Nomination Application as submitted is incomplete, lacks a substantial amount of required discussion and information, and contains numerous inconsistencies and errors, and therefore should be deemed incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time.**

**A. Governing Regulations & NPS Technical Guidance**

60 CFR §60.6(k) states:

**(k)** Nominations approved by the State Review Board and comments received are then reviewed by the State Historic Preservation Officer and if he or she finds the nominations to be *adequately documented and technically, professionally, and procedurally correct and sufficient and in conformance with National Register criteria for evaluation*, the nominations are submitted to the Keeper of the National Register of Historic Places, National Park Service, United States Department of the Interior, Washington, D.C. 20240. All comments received by a State and notarized statements of objection to listing are submitted with a nomination”<sup>30</sup> (emphasis added)

Additional review guidance is provided in the National Park Service’s “Technical Review Checklist” and “Substantive Checklist”<sup>31</sup> which respectively highlight the various potential consistency, technical and substantive issues commonly identified by the reviewers.

**B. Analysis & Application to Proposed District**

A cursory review of the Nomination Application using the National Park Service’s “Technical Review Checklist” and “Substantive Checklist” as a guide reveal the following consistency, technical and substantive issues within the Nomination Application. DEP encourages the State Board, SHPO and Keeper to review the Nomination Application with the below spotted issues in mind, and conclude that the Nomination Application as submitted in its current form is incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time

- The total number of contributing and noncontributing resources listed in Sections 5 and 7 are inconsistent.
- The Chart contained on pages 5/6 of the application contains several formatting errors that combine contributing and noncontributing resources into one line item.
- Labeling of Photos and Figures. The photos are referenced by number in the description portions of the Nomination Application, but then are not numbered as appended. Figures are numbered as appended, however some of the Figures are also photos, which resulted in substantial confusion during review.
- The map on page 38 titled “Ashokan Field Campus Historic District Photo Key”– references photos “40, 41, 42” – these are not photos appended or referenced anywhere in the application. They specifically do not correspond with any

<sup>30</sup> 36 CFR §60.6

<sup>31</sup> See *National Review Checklists* available for download at <https://www.nps.gov/nr/publications/forms.htm>

contributing/noncontributing items listed in Section 7, pages 5/6 as the rest of the numbers in the map do.

- Section 7, Resource No. 29 Campsite – is noted as “2 buildings”, but it is unclear whether these two buildings are counted as distinct contributing resources or one single resource.
- Descriptions of the resources in Section 7 are inconsistent in length and detail, and in many places unclear and seemingly incomplete – particularly with respect to the listed items that are labeled contributing resources. The descriptions for these resources becomes more inadequate as the list progresses.
- Alterations that occurred to the listed resources have not been adequately described in the application, or at times even mentioned at all.
- DEP is named at the “Department of Environmental Education” within Application (see page 3 Summary Paragraph).
- Properties have been altered and the differences between the original and current conditions/appearances is not clearly established or described in accordance with the applicable federal regulations.
- Section 3 of the Application is partially completed and should be completely left blank and filled in by State and National Register review agencies.

### **General Conclusion**

DEP, as an interested property owner whose land falls within the Proposed District, hereby submits these Nomination Application comments for review and consideration by New York State Board of Historic Preservation, the New York State Historic Preservation Officer, the National Park Service and the Keeper of the National Register of Historic Places, as applicable, for their respective use and consideration while reviewing Applicant’s Nomination Application and determining the eligibility of the Proposed District for listing in the National and/or State Registers. Based on the reasons set forth above, DEP does not believe the Proposed District is eligible for listing at this time in either the State or the National Register. Should any of the reviewing person(s) or agencies wish to discuss or clarify DEP’s position(s), you may contact:

Casey McCormack,  
Assistant Counsel,  
DEP Bureau of Legal Affairs  
(718) 595 6503



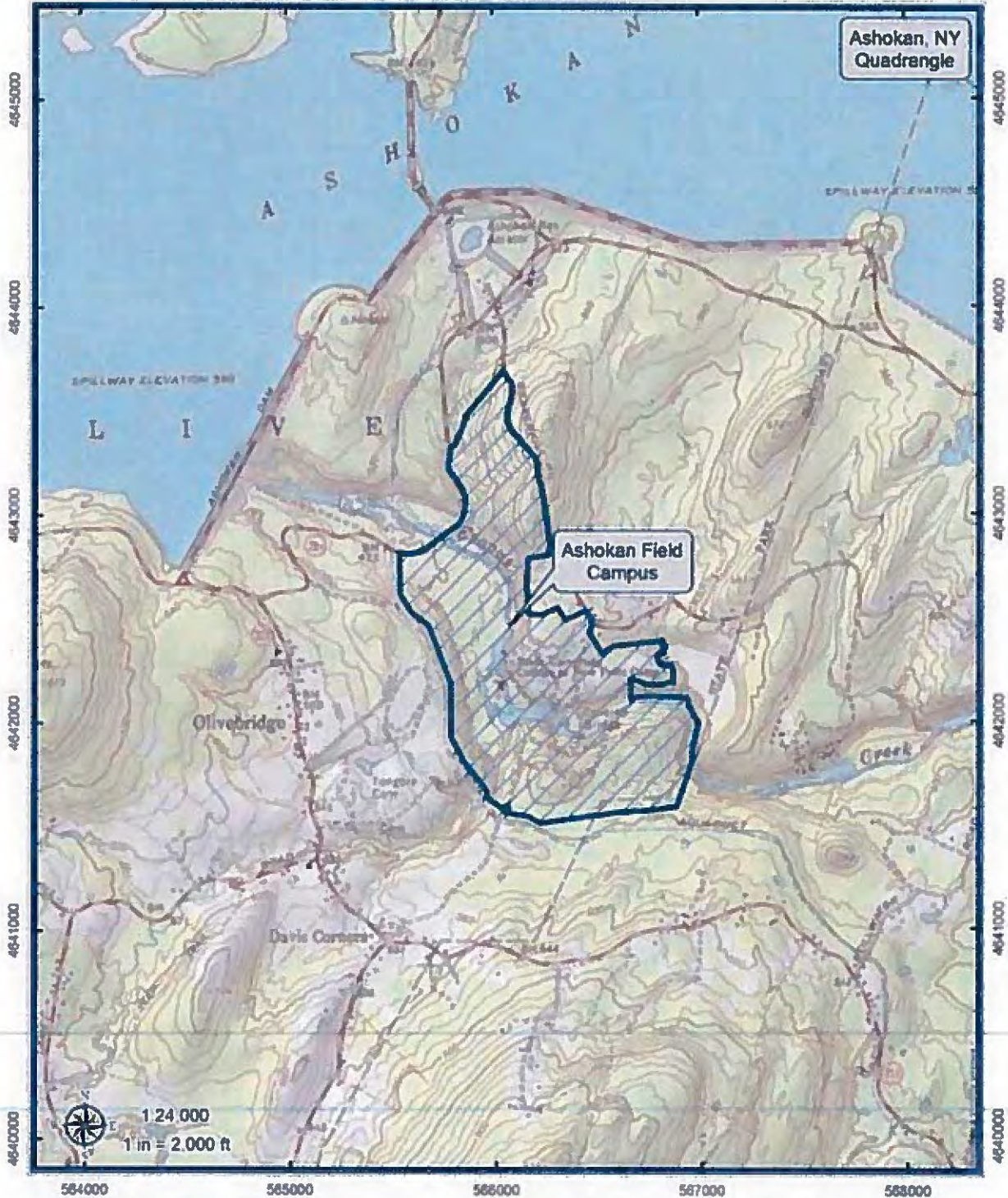
**EXHIBIT "A"**  
**Boundary Maps & Site Plan**

**Ashokan Field Campus Historic District** **DRAFT**  
Name of Property

**Ulster, New York**  
County and State

**Ashokan Field Campus**  
**Olive Bridge, Ulster Co., NY**

**477 Beaverkill Road**  
**Olive Bridge, NY 12461**



Coordinate System: NAD 1983 UTM Zone 18N  
Projection: Transverse Mercator  
Datum: North American 1983  
Units: Meter



**NEW YORK STATE**  
Parks, Recreation  
and Historic Preservation  
Division for Historic Preservation

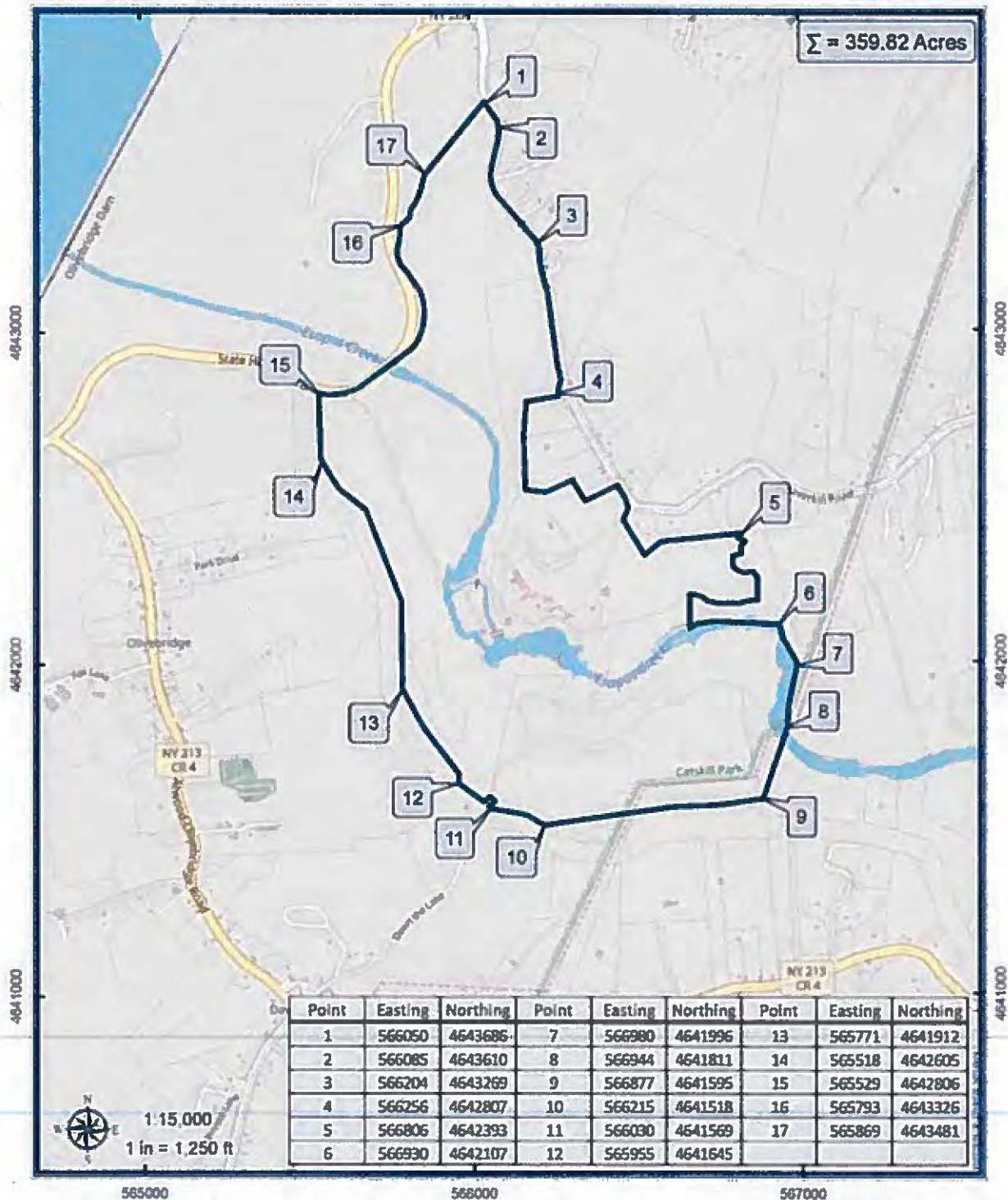


Ashokan Field Campus Historic District **DRAFT**  
 Name of Property

Ulster, New York  
 County and State

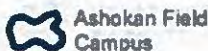
Ashokan Field Campus  
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Coordinates System: NAD 1983 UTM Zone 18N  
 Projection: Transverse Mercator  
 Datum: North American 1983  
 Units: Meter

0 405 810 1,620 Feet



NEW YORK  
 Parks, Recreation  
 and Historic Preservation  
 Division for Historic Preservation

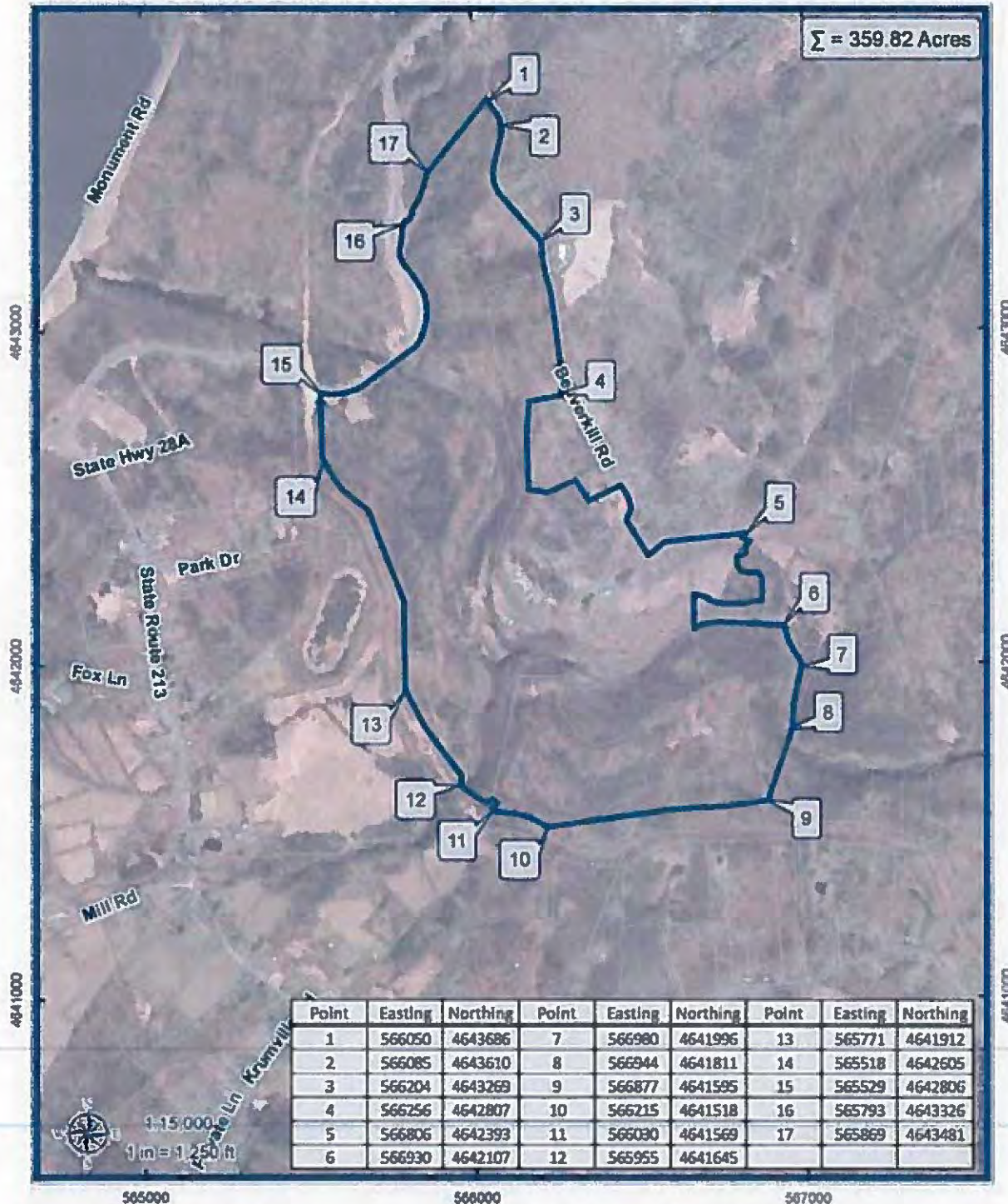


Ashokan Field Campus Historic District **DRAFT**  
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 Olive Bridge, Ulster Co., NY

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Coordinate System: NAD 1983 UTM Zone 18N  
 Projection: Transverse Mercator  
 Datum: North American 1983  
 Units: Meter

0 405 810 1,620 Feet





**Ashokan Field Campus Historic District** **DRAFT**  
Name of Property

**Ulster, New York**  
County and State



Ashokan Field Campus Historic District Site Plan

**EXHIBIT "B"**  
**"Ashokan Field Campus Historic District Photo Key"**



**Ashokan Field Campus Historic District** **DRAFT**  
Name of Property

**Ulster, New York**  
County and State



Ashokan Field Campus Historic District Photo Key

**EXHIBIT "C"**  
**DEP Aerial GIS Map**



Ashokan Reservoir



Catskill Aqueduct

Gipalee, York - OEP  
SR# 53.9.2.32.100  
219.75 Acres

Ashokan Foundation, Inc.  
SR# 53.9.2.32.100  
80.8 Acres

Ashokan Foundation, Inc.  
SR# 53.1.2.32.300  
60.51 Acres

OLIVE

MARBLE TOWN

# Ashokan Field Campus Proposed Historic District

## Legend:

- Ashokan Foundation Parcels and Adjacent NYCDEF Parcel
- NYC-owned Non-LAP Fee Lands
- Protected Open Space
- Other Parcels
- Catskill Aqueduct
- Town Boundaries

NYC



Prepared by: NYCDEF  
Date: 10/20/2017  
Version: 2017  
Reviewed by: NYCDEF  
Scale: 1:10000





November 8, 2018

**Vincent Sapienza, P.E.**  
*Commissioner*

**Paul V. Rush, P.E.**  
Deputy Commissioner  
Bureau of Water Supply  
prush@dep.nyc.gov

P.O. Box 358  
Grahamsville, NY 12740  
T: (845) 340-7800  
F: (845) 334-7175

**Commissioner Rose Harvey**  
New York State Historic Preservation Officer  
Commissioner of Parks, Recreation and Historic Preservation  
P.O. Box 189  
Waterford, NY 12188

**Deputy Commissioner R. Daniel Mackay**  
Deputy Commissioner for Historic Preservation  
Deputy State Historic Preservation Officer  
NYS Parks, Recreation and Historic Preservation  
P.O. Box 189  
Waterford, NY 12188

**Re: The Ashokan Field Campus Historic District**  
477 Beaverkill Road,  
Olive Bridge, NY 12461  
Ulster County

Dear Commissioner Harvey and Deputy Commissioner Mackay:

I am writing on behalf of the City of New York ("City") and the New York City Department of Environmental Protection ("DEP") who hereby object to and comment on the designation and listing of the "Ashokan Field Campus Historic District" ("Proposed District") in the National and New York State Registers of Historic Places in accordance with 36 CFR §60.6(g) and 9 NYCRR §427.4 respectively.

The Proposed District spans three parcels in Ulster County, New York, two of which are owned by the Ashokan Foundation, Inc. ("AFI Parcels"), one of which is owned by the City, by and through DEP ("DEP Parcel"). On August 21, 2018, DEP received a notice letter from Deputy Commissioner Mackay ("Notice Letter") that stated the Proposed District was being considered by the New York State Board of Historic Preservation for listing in the National and State Registers of Historic Places, and that the DEP Parcel was one of the properties comprising the Proposed District. DEP Assistant Commissioner Dave Warne subsequently requested a copy of the National Register of Historic Places Registration Form that was submitted to your office nominating the Proposed District for listing consideration ("Nomination Application"), for DEP's review and comment, which he received from your office via email on August 30, 2018. On September 10, 2018, DEP requested via letters and emails addressed to each of you that the State Board's consideration of the Proposed District be postponed in accordance with 9 NYCRR 427.4(d) to allow DEP additional time to review the Nomination Application and prepare comments thereto. Division Director Michael F. Lynch notified DEP via email on September 11, 2018 that Deputy



Commissioner Mackay had granted DEP's request for extension to November 9, 2018, to which he attached a signed letter from the Deputy Commissioner effectuating same ("Extension Letter").

Upon further review of the Nomination Application in conjunction with all applicable federal and state law, and supplemental technical guidance bulletins published by the National Parks Service, DEP, acting on behalf of the City as the sole fee simple owner of the DEP Parcel, hereby formally objects to the nomination and listing of the Proposed District in the National Register of Historic Places pursuant to 36 CFR §60.6(g), and in particular, to the inclusion of the DEP Parcel within the Proposed District's boundary line.

DEP submits the attached comments to the Nomination Application ("Comments") in accordance with 9 NYCRR §427.4, and consistent with the submission requirements noted in the Deputy Commissioner's Extension Letter dated September 11, 2018. As further detailed in the attached Comments, DEP contests the eligibility of the Proposed District for listing in both the State and National Registers of Historic Places for the following reasons:

- I. The boundary of the Proposed District is too large and thus is improper for listing in both the National and State Registers as proposed;
- II. The integrity of a majority of the Proposed District's contributing resources have been compromised, and the Applicant has not properly discussed or demonstrated that these contributing resources individually and/or collectively qualify the Proposed District for any of the Criteria Considerations enumerated in 36 CFR §60.4;
- III. Due to the aforementioned contributing resource integrity issues, the historic significance of the Proposed District is compromised, thereby negating the Proposed District's eligibility for listing; and
- IV. The Nomination Application as submitted is incomplete, lacks a substantial amount of required discussion and information, and contains numerous inconsistencies, and therefore should be deemed incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time.

DEP respectfully requests that the SHPO and the State Board carefully consider the attached Comments in conjunction with their review(s) of the Nomination Application, and collectively conclude that, based upon the current state of the Nomination Application, the Proposed District is ineligible for listing in the National and State Registers.

Please confirm your timely receipt of this letter and the enclosed Comments. Thank you for your time and consideration.

Sincerely,



Paul V. Rush, P.E.  
Deputy Commissioner

- c: **Michael Lynch, Division Director, NYS Division for Historic Preservation**
- David Warne, Assistant Commissioner, DEP Bureau of Water Supply**
- Casey McCormack, Assistant Counsel DEP Bureau of Legal Affairs**
- Daniel Mulvihill, Senior Environmental Counsel, DEP Bureau of Legal Affairs**
- Robin Levine, Senior Environmental Counsel, DEP Bureau of Legal Affairs**

TERESA AMERSON  
Assistant Commissioner  
Bureau of Water Supply  
Department of Environmental Protection  
609 West Broadway, Albany, NY 12242-1200  
518-474-8300



**ACKNOWLEDGEMENT**

STATE OF NEW YORK

SS:

COUNTY OF Sullivan

On the 8<sup>th</sup> day of November in the year 2018 before me, the undersigned, personally appeared **PAUL V. RUSH**, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed same in his capacity, and that by his signature on the within instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

*Pamela Zanetti*

Notary Public

Printed Name: Pamela Zanetti

My Commission Expires:

8/31/22

**PAMELA ZANETTI**  
Notary Public, State of New York  
Residing in the County of Sullivan  
Commission Expires Aug. 31, ~~2018~~ 2022  
Reg. No. 01ZA4714481

**COMMENTS ON THE ASHOKAN FIELD CAMPUS HISTORIC DISTRICT  
NOMINATION APPLICATION TO  
THE STATE & NATIONAL REGISTERS OF HISTORIC PLACES**

**Background**

The City of New York (“City”) and the NYC Department of Environmental Protection (“NYCDEP”) (the City and NYCDEP shall hereinafter collectively be referred to as “DEP”) in accordance with 9 NYCRR §427.4, jointly submit this written statement containing DEP’s comments on the National Register of Historic Places Registration Application prepared by Larson Fisher Associates, Inc. (“Applicant”) nominating the Ashokan Field Campus Historic District (“Proposed District”) for concurrent listing in the New York State and National Registers of Historic Places (“Nomination Application”). The Proposed District is comprised of three parcels located in Ulster County, New York, two of which are owned by the Ashokan Field Institute, Inc. (“AFI Parcels”), and one of which is owned by DEP (“DEP Parcel”). As further explained in the Comments below, DEP believes the Proposed District is ineligible for listing in both the State and National Registers for the following reasons:

- I. The boundary of the Proposed District is too large and thus is improper for listing in both the National and State Registers as proposed;
- II. The integrity of a majority of the Proposed District’s contributing resources have been compromised, and the Applicant has not properly discussed or demonstrated that these contributing resources individually and/or collectively qualify the Proposed District for any of the Criteria Considerations enumerated in 36 CFR §60.4;
- III. Due to the aforementioned contributing resource integrity issues, the historic significance of the Proposed District is compromised, thereby negating the Proposed District’s eligibility for listing; and
- IV. The Nomination Application as submitted is incomplete, lacks a substantial amount of required discussion and information, and contains numerous inconsistencies, and therefore should be deemed incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time.

DEP respectfully requests that the New York State Board of Historic Preservation, the New York State Historic Preservation Officer, the National Parks Service and the Keeper of the National Register of Historic Places carefully consider these comments in conjunction with the Nomination Application, and respectively conclude that the Proposed District is ineligible for listing in the National and State Registers at this time.

**Comments**

DEP offers the following comments in support of its position that the Proposed District is ineligible for listing in the State and National Registers at this time:



**I. The boundary of the Proposed District is too large and thus is improper for listing in both the National and State Registers as proposed;**

**A. Governing Regulations & NPS Technical Guidance**

36 CFR §60.3 defines a “District” as “a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history.”<sup>1</sup> The National Register Bulletin No. 15, *How to Apply the National Register Criteria for Evaluation* (“NRB 15”) further contextualizes this definition by stating: “A district derives its importance from being a unified entity ... [it] must be a definable geographic area that can be distinguished from surrounding properties by changes such as density, scale, type, age, style of sites, buildings, structures, and objects, or by documented differences in patterns of historic development or associations. It is seldom defined, however, by the limits of current parcels of ownership, management or planning boundaries. The boundaries must be based upon a shared relationship among the properties constituting the district.”<sup>2</sup>

Section 10 of the National Register Registration Application Form requires applicants to include a Boundary Justification statement that provides an explanation of the reasons for the applicant’s selection of the proposed boundary for the nominated historic property or district.<sup>3</sup> National Register Bulletin No. 16A, titled *How to Complete the National Register Registration Form* (“NRB 16A”), further explains the required level of detail to be included in the justification statement, and specifically notes that “Properties with substantial acreage require more explanation than those confined to small city lots.”<sup>4</sup> In addition, NRB 16A lists the following guidelines for applicants to review and consider while choosing an appropriate boundary line for a property or district:

**1. For All Properties:<sup>5</sup>**

- a. Carefully select boundaries to encompass, but not exceed the full extent of the significant resources and land area making up the property.

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<sup>1</sup> 36 CFR §60.3. *Note*, in the instant case, the Proposed District has been concurrently nominated for listing in both the State and National Registers. Pursuant to 9 NYCRR §427.1(a), in the event of a concurrent listing proposal, review for listing in the State register shall primarily be done in accordance with the National Register nomination review process: “(a) Except as provided for in subdivision (b) of this section, all proposals for the listing of properties on both the National Register and State Register shall be submitted, reviewed and acted upon in accordance with the regulations governing the *National Register* (emphasis added) ...”. Unless specifically noted otherwise herein, all analyses discussed in this document will have been undertaken and performed through the lens of the applicable federal regulatory analysis mechanisms as required by 36 CFR Part 60, and also in compliance with 9 NYCRR §427.1.

<sup>2</sup> *See*, National Register Bulletin No. 15, *How to Apply the National Register Criteria for Evaluation*: <https://www.nps.gov/nr/publications/bulletins/nrb15/>, p. 5-6 (hereinafter “NRB 15”).

<sup>3</sup> *See*, National Register Bulletin No. 16A, *How to Complete the National Register Registration Form*, <https://www.nps.gov/nr/publications/bulletins/nrb16a/>, p. 54-57, Appendix IV:I (hereinafter “NRB 16A”).

<sup>4</sup> *Id.* at 55

<sup>5</sup> *Id.* at 56

- b. The area to be registered should be large enough to include all historic features of the property, but should not include “buffer zones” or acreage not directly contributing to the significance of the property.
  - c. Leave out peripheral areas of the property that no longer retain integrity, due to subdivisions, development or other changes.
2. *Specifically For Historic Districts:*<sup>6</sup> Select boundaries to encompass the single area of land containing the significant concentration of buildings, sites, structures, or objects making up the district. The district's significance and historic integrity should help determine the boundaries. Consider the following factors:
- a. Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character.
  - b. Visual changes in the character of the area due to different architectural styles, types or periods, or to a decline in the concentration of contributing resources.
  - c. Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch.
  - d. Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.

**B. Analysis & Application to Proposed District**

The Proposed District in this instance spans 359.82 acres, and the boundary is explained by the Applicant in the Boundary Justification portion of the Nomination Application’s Section 10 as follows: “The boundary was drawn to encompass the tract assembled by the New York State Teachers College at New Paltz for the Ashokan Field Campus in 1957.”<sup>7</sup>

Immediately following Section 10 are four aerial maps of the Proposed District, which have been collectively attached hereto as Exhibit “A” for your review in conjunction herewith. The first three maps depict the outer boundary points of the Proposed District as viewed from various heights and scales, all of which are clearly measurable and discernable using the informational keys provided at the bottom of each of the respective maps.<sup>8</sup> The fourth map/site plan, titled, “Ashokan Field Campus Historic District Site Plan” (“Site Plan”), is an unscaled aerial photograph showing a small fraction of the acreage comprising the Proposed District. The exact amount of acres and scale of this Site Plan is unascertainable given the information provided by

<sup>6</sup> *Id.* at 56-57

<sup>7</sup> Nomination Application p. 29.

<sup>8</sup> DEP understands and acknowledges that these three maps were included in the Applicant’s Nomination Application to fulfill the Verbal Boundary Description requirements of Section 10.



the Applicant. However, DEP staff familiar with the property confirmed upon review that the Site Plan did in fact depict a small, concentrated area within the Proposed District boundary that is home to a large majority of the Nomination Application's listed complying and non-complying structures, sites and buildings ("Site Plan Area").<sup>9</sup> In addition, the Applicant also included a fifth aerial map/photograph, titled "Ashokan Field Campus Historic District Photo Key" on page 38 of the Nomination Application, which is attached hereto as Exhibit "B" and attempts to numerically depict the approximate locations of all of the contributing and non-contributing resources found throughout the Proposed District.<sup>10</sup> As was the case with the preceding Site Plan, this fifth aerial image also fails to disclose the amount of acreage shown in the photo or the scale/height at which the image was taken. In addition it fails to show the greater boundary line of the Proposed District in relation to the concentration of contributing and noncontributing resources labeled numerically thereon.

In an effort to better understand the boundary of the Proposed District in conjunction with the location of the concentration of contributing and noncontributing resources discussed in the Nomination Application, DEP composed an aerial map of the Proposed District using its in-house Geographic Information Systems technology. This map, which is attached hereto as Exhibit "C", shows, among other things, the total boundary lines of the 359.82-acre Proposed District, as well as the general location of the Site Plan Area referenced above.<sup>11</sup> A plain review of this map supports the conclusion that the boundary of the Proposed District far exceeds the concentrated Site Plan Area. In addition, when this map is viewed alongside the Applicant's fifth aerial image attached hereto as Exhibit "B", DEP's position that the contributing and noncontributing resources are concentrated in a specific, smaller area of the Proposed District, is only further reinforced.

As aforementioned in the Governing Regulations & NPS Technical Guidance Section above, a District is "a geographically definable area ... possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development."<sup>12</sup> DEP acknowledges that a *portion* of the Proposed District may be a geographically definable area possessing a significant concentration of sites, buildings, structures, or objects; however notwithstanding, DEP contests the overall boundary of the Proposed District as labeled and justified in Section 10 for the following reasons:

1. The Proposed District's boundary and the encompassing 359.82-acre geographic area is too expansive and as such, is not distinguishable from surrounding properties by changes such as density, scale, type, age, style of

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<sup>9</sup> *Id.* at 33.

<sup>10</sup> *Id.* at 38. Note, DEP takes issue with the overall accuracy and numerical formatting used in this map, which it discusses at greater length in Section IV of these Comments.

<sup>11</sup> Due to the lack of information provided in support of the Site Plan, the exact range and acreage of the Site Plan Area could not be depicted on DEP's attached map. Instead, DEP has circled the general Site Map Area in red on its map for your reference and review.

<sup>12</sup> 36 CFR §60.3

sites, buildings, structures, and objects.<sup>13</sup> In fact, the opposite is true. A large portion of the Proposed District is vacant and contains no evidence of historical remnants. Instead these areas are likely nothing more than densely forested woods that house no contributing or noncontributing sites, buildings, structures or objects. As the Applicant noted itself on page 3 of the Nomination Application, “most of the property is second growth forest.”

2. The Applicant’s boundary justification fails to sufficiently explain the extensive 359.82-acre boundary line of the Proposed District as encouraged by NRB 16A.<sup>14</sup> There are substantial portions of the Proposed District that are indistinguishable with no evidence of significance, and as such, arguably amount to nothing more than improper acreage buffer zones. Without further explanation from the Applicant in the Boundary Justification as to why these additional vacant acres should be included in the Proposed District, the Boundary Justification is insufficient.
3. The forested, indistinguishable areas of the Proposed District lack integrity, stemming from the 2008 tract sale and subsequent subdivision into three parcels whereby DEP acquired ownership of the central parcel for purposes of operation of the NYC Water Supply System, and the Ashokan Field Institute, Inc. acquired the remaining two buffering parcels.

### **Section I Conclusion**

For the reasons set forth above, DEP believes that the boundary of the Proposed District is excessive and as such cannot be included in the National and State Registers at this time.

- II. The integrity of a majority of the Proposed District’s contributing resources have been compromised, and the Applicant has not properly discussed or demonstrated that these contributing resources individually and/or collectively qualify the Proposed District for any of the Criteria Considerations enumerated in 36 CFR §60.4;**

#### **A. Governing Regulations & NPS Technical Guidance**

The “Criteria Considerations” section of 36 CFR §60.4 lists certain types of properties that ordinarily, due to their nature, will not be considered or deemed eligible for listing. Properties on this list include, but are not limited to:

- i. Structures that have been moved from their original locations,
- ii. Reconstructed historic buildings, and/or
- iii. Properties primarily commemorative in nature.<sup>15</sup>

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<sup>13</sup> See NRB 15 p. 5-6.

<sup>14</sup> NRB 16A at 55

<sup>15</sup> See 36 CFR §60.4



However, 36 CFR §60.4 goes on to list limited, “special circumstances” also known as “criteria considerations”, which operate to requalify these ordinarily ineligible properties for listing despite their disqualifying properties:

“such properties will qualify if they are integral parts of districts that do meet the criteria of [*sic*]<sup>16</sup> if they fall within the following categories:

- a. ...
- b. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- c. ...
- d. ...
- e. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- f. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance ....”<sup>17</sup>

NRB 15 further clarifies that “the Criteria Considerations need to be applied only to *individual* properties. Components of eligible districts do not have to meet the special requirements unless they make up the majority of the district or are the focal point of the district.”<sup>18</sup>

NRB 16A instructs applicants to complete the Criteria Considerations portion of Section 8 of the National Register Registration Application as follows:

“Mark an ‘x’ in the box for any criteria consideration applying to the property. Mark all that apply. Leave this section blank if no considerations apply ... For **districts**, mark only the criteria considerations applying to the entire district or to a predominant resource or group of resources within the district.”<sup>19</sup>

## **B. Analysis & Application to Proposed District**

The Applicant included a narrative description of each contributing and noncontributing resource comprising the Proposed District in Section 5 of its Nomination

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<sup>16</sup> *Note*, this seems to be a drafting error that is contained in the most current version of regulation. Based on additional analysis of NRB 15 p. 25, DEP believes the word “of” as used here, should instead be replaced with the word “or”. In the event this interpretation is improper, DEP requests further interpretative guidance from the SHPO and/or the National Parks Service.

<sup>17</sup> *Id.* Note, DEP has only listed the portions of the regulatory exemptions herein that it believes could possibly apply to the Proposed District.

<sup>18</sup> NRB 15 at 25

<sup>19</sup> NRB 16A at 36

Application. However, upon review of applicable federal regulations and NPS technical guidance bulletins, DEP submits that a large number of the Proposed District's purported contributing resources do not qualify as such because their historic integrity has been compromised due to movement, reconstruction, and/or the nature of the property as primarily commemorative in nature.<sup>20</sup>

DEP hereby comments on the following contributing resources in the Proposed District and questions them for their historic integrity and/or significance:

1. **Winchell Moehring House** – this building has been substantially reconstructed and repurposed since it was first built in the 18<sup>th</sup> century. Most recently, in 2015, a metal roof was added to the building, which brings the building's historic integrity into question. In addition, although the building has been in continuous use since the 18<sup>th</sup> century, the types of uses and functional purposes of the structure have varied substantially over time and most of the uses do not directly relate to the operation of the Ashokan Field Campus.
2. **Moehring Barn** – this building has been reconstructed in the last 5 years. According to the description, in 2015, a metal roof was added, and later in 2017, solar panels were installed. Further, this building's uses have varied greatly over time.
3. **Wagon Shed** – a review of the attached photo of this structure indicates that it was possibly reconstructed through the addition of a metal roof and solar panels; however, it is worth noting that this work was not detailed in the description section of the Nomination Application.<sup>21</sup>
4. **Granary** – DEP questions when the concrete elevation of this building occurred as noted in Section 5. Based on the description provided, it is not evident whether the elevation was undertaken at the time the building was erected, or instead at some later date. Further, the description states that the building “was built ... following traditional models to develop a farmyard with buildings *typical of the 19<sup>th</sup> century period*” (emphasis added), which DEP believes, without additional detailed information, is indicative of a structure that is primarily commemorative in nature.
5. **Smokehouse** – the description states that the building “was built ... following *traditional models* to develop a homestead with buildings *typical of the 19<sup>th</sup> century period*” (emphasis added), which DEP believes, without additional detailed information, is indicative of a structure that is primarily commemorative in nature.

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<sup>20</sup> See generally 36 CFR §60.4 *Criteria Considerations (b),(e),(f)*

<sup>21</sup> Note, DEP had some issues identifying each structure based on the attached photos because the photos were not labeled.



6. **Winchell's Falls & Hudson River Pulp & Paper Mfg. Co. Dam and Mill Site** – DEP questions the historic integrity and significance of this resource as a contributing property. Based on the scant information provided in the Section 5 description, it is very unclear how this site, and its historical context, contribute and connect to the Proposed District.
7. **Ashokan – Turnwood Covered Bridge** – this site is presently on the National Register of Historic Places and as such is not counted towards the total count of contributing resources within the Proposed District. It is worth noting that this bridge was substantially reconstructed in 2016 under the direction and supervision of the Ashokan Center. DEP was not involved in the reconstruction project and is unaware of how the work could have or did impact the bridge's National Register listing status.
8. **Print Shop** – as noted in the Section 5 description, this structure was originally built for a law office in Tillson, New York (near New Paltz) and was subsequently moved to its current location by camp staff in 1970. DEP questions this structure's historic integrity as a structure moved from its original location, and as a potentially reconstructed historic building.
9. **Old Foundation, 19th century** – DEP questions the historic integrity and significance of this property as it relates to the historical context and operations of this Ashokan Field Campus Historic District. The description states: "cellar hole for an unknown building with stone walls on four sides believed to be associated with Lemuel Winchell. *The site has been partially disturbed by amateur excavations by campers over the years, but may retain some archaeological potential.*" This site description is vague and raises questions as to how this site qualifies as a contributing source. In addition, in light of the campers' amateur excavation activities, it is arguable that the site's historic integrity has been compromised.
10. **Picnic Pavilion** – the description provided for this structure is extremely vague and it is unclear how this structure contributes to the Proposed District's historic significance.
11. **Sauna** – the description provided for this structure is extremely vague and it is unclear how this structure contributes to the Proposed District's historic significance.
12. **Campsite** – the description provided for this structure is extremely vague and it is unclear how this structure contributes to the Proposed District's historic significance.

As noted in the Governing Regulations & NPS Technical Guidance portion of this Section, generally individual components of eligible districts do not have to be evaluated individually for their integrity and thereafter be found to individually meet the Criteria

Considerations special requirements. However, individual components of districts *will be* evaluated in this way when properties with compromised integrity and any applicable qualifying criteria components, make up the *majority* of the district or are the focal point of the district.<sup>22</sup> In such a case, the relevant criteria considerations potentially applicable the district and/or the district's majority resource group/properties should be acknowledged as such in Section 8, and the applicability should thereafter be discussed by the applicant.

In the instant case, DEP believes that a majority of the contributing properties that comprise the Proposed District have compromised integrity for one or more of the reasons discussed above. In light of this majority integrity issue, DEP questions the overall integrity of the Proposed District, and posits that the Applicant should have completed the Criteria Considerations portion of Section 8 of the Nomination Application in order to appropriately address these integrity issues. Failure of the Applicant to do so amounts to a serious substantive flaw in the Applicant's Nomination Application. Alternatively, the Applicant could have argued that one or more Criteria Considerations applied to the District as a whole; however, this was not done either. No portion of the Criteria Considerations were addressed by the Applicant in Section 8 of the Nomination Application.

### **Section II Conclusions:**

DEP questions the integrity of a majority of the Proposed District's contributing resources and hereby requests that the Applicant either reevaluate the Nomination Application and revise it accordingly to address the above mentioned integrity issues via Criteria Considerations, or alternatively, requests that the State Board and SHPO deny the Proposed District for listing in the National and State Registers at this time because a majority of the Proposed District's contributing resources as described in the Nomination Application have been shown to have compromised integrity without applicable Criteria Considerations.

### **III. Due to the aforementioned contributing resource integrity issues, the historic significance of the Proposed District is compromised, thereby negating the Proposed District's eligibility for listing; and**

#### **A. Governing Regulations & NPS Technical Guidance**

The portion of 36 CFR §60.4 titled "Criteria for Evaluation" states:

*"The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:*

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or

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<sup>22</sup> NRB 15 at 25



- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.”<sup>23</sup> (emphasis added)

NRB 15 further guides applicants and regulatory reviewers regarding the proper application of the Criteria for Evaluation to properties and districts:

“For a property to qualify for the National Register it must meet one of the National Register Criteria for evaluation by:

- Being associated with an important historic context, *and*
- Retaining historic integrity of those features necessary to convey its significance.”<sup>24</sup>

In regards to historic significance and integrity of districts and the properties that make up those districts, NRB 15 states:

“A district must be *significant* as well as being an identifiable entity. ... *the majority of the components that add to the district’s historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.* A district can contain buildings, structures, sites, objects, or open spaces that do not contribute to the significance of the district. *The number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district’s integrity*”<sup>25</sup> (emphasis added).

## **B. Analysis & Application to Proposed District**

As discussed in Section II above, DEP questions the integrity of approximately 12 of 17 of the Proposed District’s contributing resources<sup>26</sup>. In light of the Applicant’s failure to address these majority contributing resource integrity issues via discussion and appropriate marking of the Criteria Considerations portion of Section 8 of the Nomination Application, DEP does not think the remaining uncompromised contributing resources individually, or collectively as part of the Proposed District, retain enough historic significance under Criteria A or C as listed in 36 CFR §60.4.

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<sup>23</sup> See 36 CFR §60.4

<sup>24</sup> NRB 15 at 3

<sup>25</sup> *Id.* at 5

<sup>26</sup> Note, the reference to 17 contributing resources is derived from page 2, Section 5 of the Nomination Application. However, DEP is unsure of the total number of contributing resources proposed by the Applicant in the application because the total number (17) listed in Section 5, does not fully match up with the total number of contributing properties listed later in Section 7.

As NRB 15 states, *“the number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district’s integrity”*<sup>27</sup> The Applicant’s failure to rehabilitate the compromised integrity of the 12 contributing resources listed in Section II significantly impacts the District’s integrity as a whole. Once the 12 resources are removed as contributing resources and reallocated as noncontributing, the Proposed District overall is left with just a total of 5 contributing resources, and 26 noncontributing resources (12 of which are have integrity issues) which are all concentrated in one relatively distinct section of the 359.82-acre Proposed District. The only logical conclusion that can result is that the District’s overall integrity has been severely compromised, which in turn prevents the District from effectively conveying its sense of time, place, and historical development. As a result, the Proposed District is not historically significant and does not meet Criteria for Evaluation (a) and (c) as stated in the Nomination Application.

In addition, separate and apart from the integrity issue, is the fact that Period of Significance described by the Applicant in Section 8 (spanning 1785 – 1970) does not logically reflect or appropriately relate in any way to the boundary line justification in Section 10.<sup>28</sup> The applicant states the following as the justification for the chosen period of significance:

“The Period of Significance was drawn to encompass the varied and evolving history of the property. It begins with Lemuel Winchell’s ca. 1785 house, which may be located on earlier foundations, and extends until ca. 1970, when the majority of the buildings associated with the Ashokan Field Campus, a college-based outdoor education program, had been completed. The property has continued to function as a camp focused on the ecological and cultural history of the Catskills region to the present day.”<sup>29</sup>

DEP fails to see how the boundary line is justified or significant when compared against the Applicant’s period of significance statement. This analysis only further supports DEP’s position that the Proposed District is ineligible for listing at this time because the Applicant has failed to prove its significance, and has also failed to demonstrate that it is an identifiable entity based on its boundary lines and the resources contained therein.

### **Section III Conclusions**

For the above-listed reasons, the resource integrity issues discussed in Section II, and the improper boundary justification discussed in Sections I and III hereof, collectively detrimentally impact the Proposed District’s historic significance to such an extent that the District does not qualify for listing under Criteria for Eligibility (A) and (C) (36 CFR §60.4).

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<sup>27</sup> NRB 15 at 5

<sup>28</sup> See generally Nomination Application page 29, stating: “the boundary was drawn to encompass the tract assembles by the New York State Teachers College at New Paltz for the Ashokan Field Campus in 1957.”

<sup>29</sup> *Id.* at 12.



**IV. The Nomination Application as submitted is incomplete, lacks a substantial amount of required discussion and information, and contains numerous inconsistencies and errors, and therefore should be deemed incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time.**

**A. Governing Regulations & NPS Technical Guidance**

60 CFR §60.6(k) states:

**(k)** Nominations approved by the State Review Board and comments received are then reviewed by the State Historic Preservation Officer and if he or she finds the nominations to be *adequately documented and technically, professionally, and procedurally correct and sufficient and in conformance with National Register criteria for evaluation*, the nominations are submitted to the Keeper of the National Register of Historic Places, National Park Service, United States Department of the Interior, Washington, D.C. 20240. All comments received by a State and notarized statements of objection to listing are submitted with a nomination”<sup>30</sup> (emphasis added)

Additional review guidance is provided in the National Park Service’s “Technical Review Checklist” and “Substantive Checklist”<sup>31</sup> which respectively highlight the various potential consistency, technical and substantive issues commonly identified by the reviewers.

**B. Analysis & Application to Proposed District**

A cursory review of the Nomination Application using the National Park Service’s “Technical Review Checklist” and “Substantive Checklist” as a guide reveal the following consistency, technical and substantive issues within the Nomination Application. DEP encourages the State Board, SHPO and Keeper to review the Nomination Application with the below spotted issues in mind, and conclude that the Nomination Application as submitted in its current form is incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time

- The total number of contributing and noncontributing resources listed in Sections 5 and 7 are inconsistent.
- The Chart contained on pages 5/6 of the application contains several formatting errors that combine contributing and noncontributing resources into one line item.
- Labeling of Photos and Figures. The photos are referenced by number in the description portions of the Nomination Application, but then are not numbered as appended. Figures are numbered as appended, however some of the Figures are also photos, which resulted in substantial confusion during review.
- The map on page 38 titled “Ashokan Field Campus Historic District Photo Key”– references photos “40, 41, 42” – these are not photos appended or referenced anywhere in the application. They specifically do not correspond with any

<sup>30</sup> 36 CFR §60.6

<sup>31</sup> See *National Review Checklists* available for download at <https://www.nps.gov/nr/publications/forms.htm>

contributing/noncontributing items listed in Section 7, pages 5/6 as the rest of the numbers in the map do.

- Section 7, Resource No. 29 Campsite – is noted as “2 buildings”, but it is unclear whether these two buildings are counted as distinct contributing resources or one single resource.
- Descriptions of the resources in Section 7 are inconsistent in length and detail, and in many places unclear and seemingly incomplete – particularly with respect to the listed items that are labeled contributing resources. The descriptions for these resources becomes more inadequate as the list progresses.
- Alterations that occurred to the listed resources have not been adequately described in the application, or at times even mentioned at all.
- DEP is named at the “Department of Environmental Education” within Application (see page 3 Summary Paragraph).
- Properties have been altered and the differences between the original and current conditions/appearances is not clearly established or described in accordance with the applicable federal regulations.
- Section 3 of the Application is partially completed and should be completely left blank and filled in by State and National Register review agencies.

### **General Conclusion**

DEP, as an interested property owner whose land falls within the Proposed District, hereby submits these Nomination Application comments for review and consideration by New York State Board of Historic Preservation, the New York State Historic Preservation Officer, the National Park Service and the Keeper of the National Register of Historic Places, as applicable, for their respective use and consideration while reviewing Applicant’s Nomination Application and determining the eligibility of the Proposed District for listing in the National and/or State Registers. Based on the reasons set forth above, DEP does not believe the Proposed District is eligible for listing at this time in either the State or the National Register. Should any of the reviewing person(s) or agencies wish to discuss or clarify DEP’s position(s), you may contact:

Casey McCormack,  
Assistant Counsel,  
DEP Bureau of Legal Affairs  
(718) 595 6503



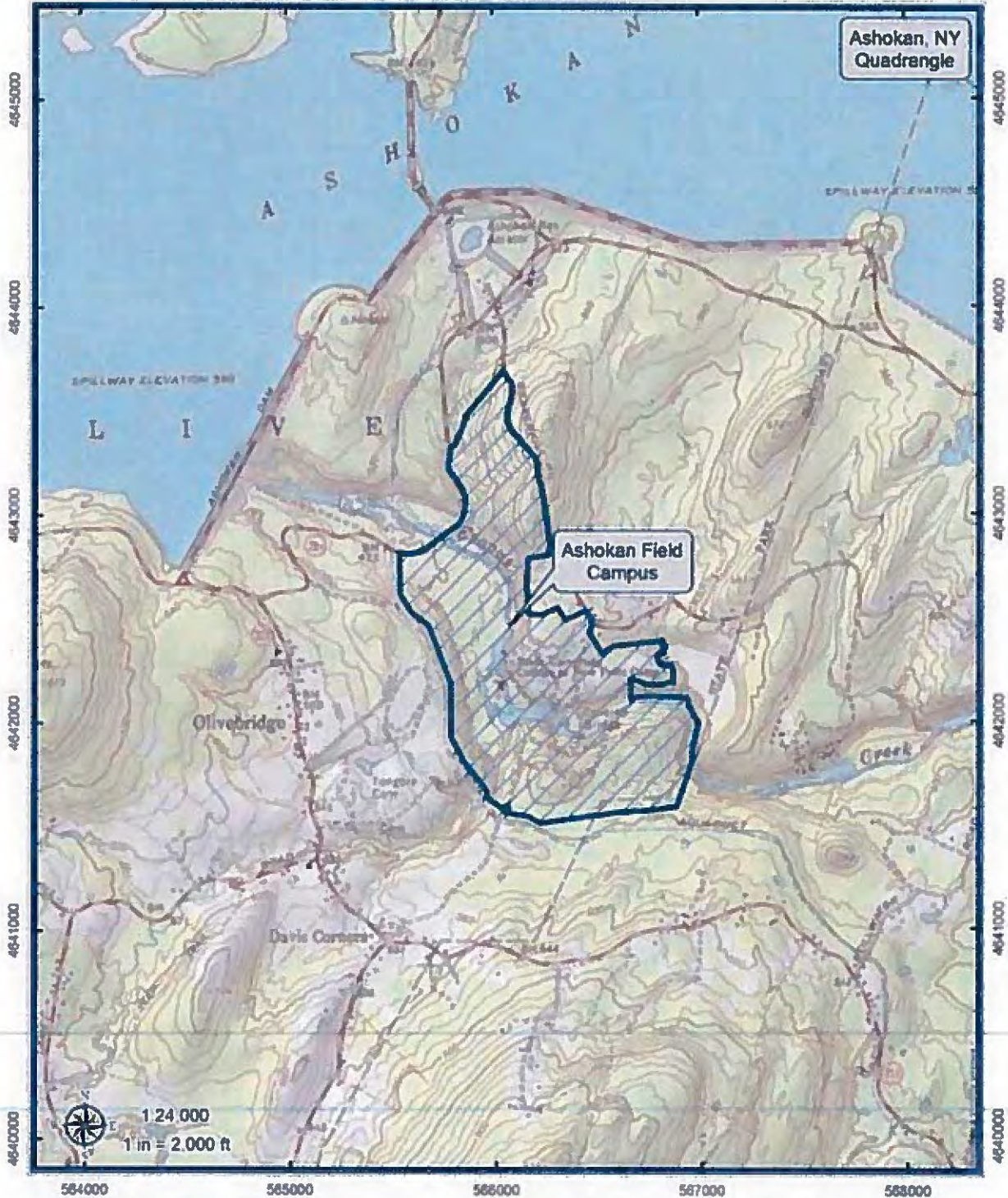
**EXHIBIT "A"**  
**Boundary Maps & Site Plan**

**Ashokan Field Campus Historic District** **DRAFT**  
Name of Property

**Ulster, New York**  
County and State

**Ashokan Field Campus**  
**Olive Bridge, Ulster Co., NY**

**477 Beaverkill Road**  
**Olive Bridge, NY 12461**



Coordinate System: NAD 1983 UTM Zone 18N  
Projection: Transverse Mercator  
Datum: North American 1983  
Units: Meter



**NEW YORK STATE** Parks, Recreation and Historic Preservation  
Division for Historic Preservation

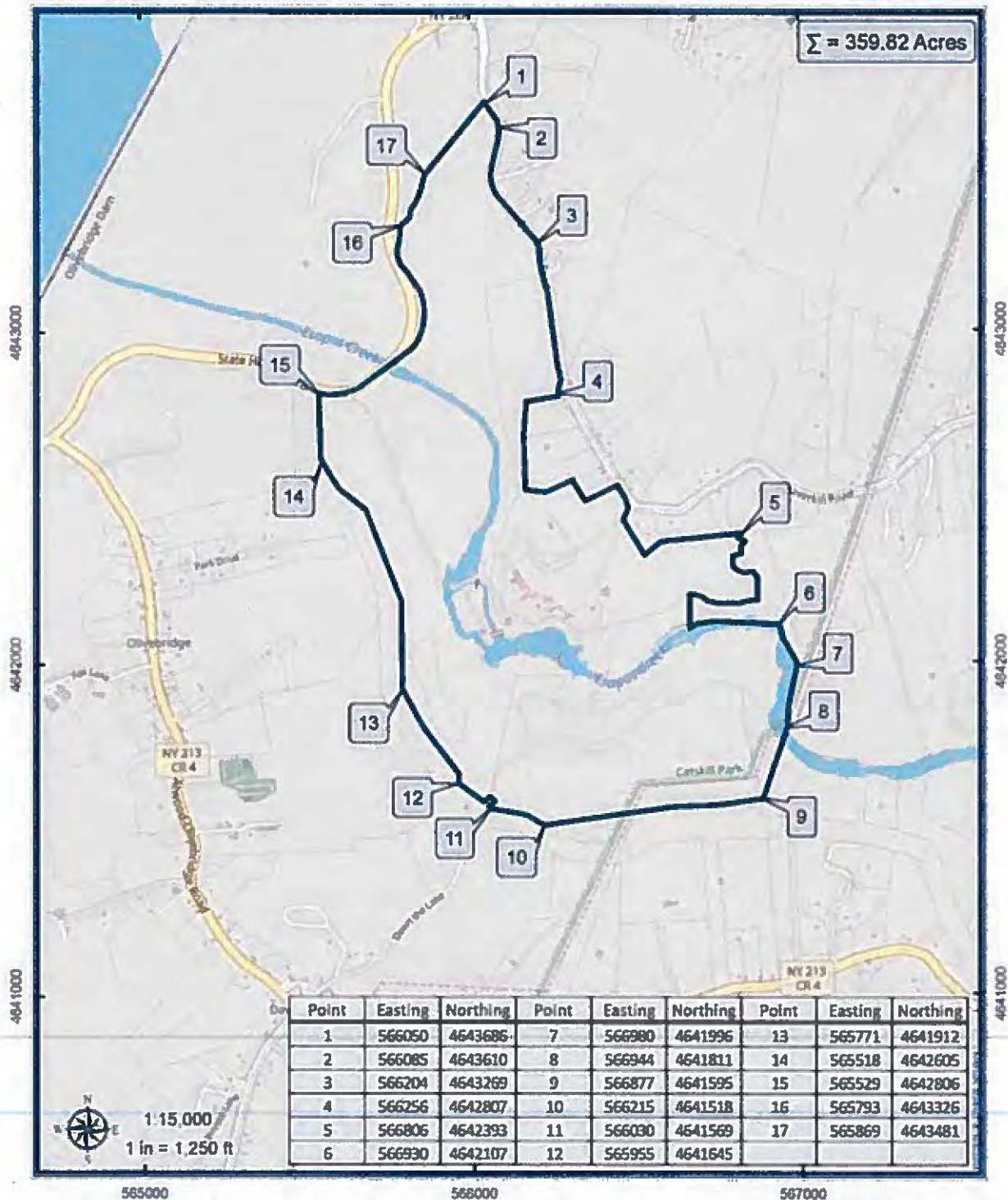


Ashokan Field Campus Historic District **DRAFT**  
 Name of Property

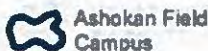
Ulster, New York  
 County and State

Ashokan Field Campus  
 Olive Bridge, Ulster Co., NY

477 Beaverkill Road  
 Olive Bridge, NY 12461



Coordinates System: NAD 1983 UTM Zone 18N  
 Projection: Transverse Mercator  
 Datum: North American 1983  
 Units: Meter



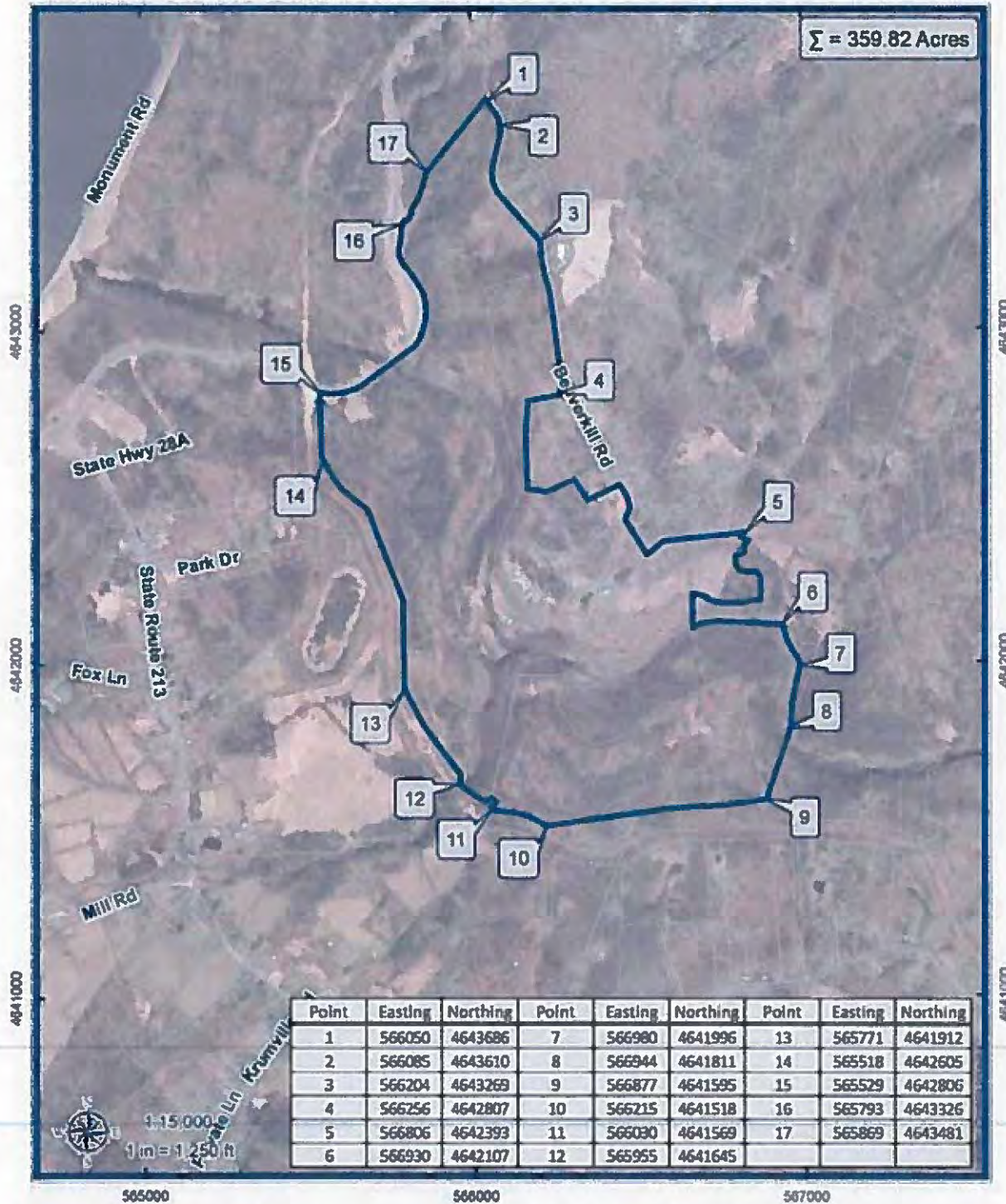


Ashokan Field Campus Historic District **DRAFT**  
 Name of Property

Ulster, New York  
 County and State

Ashokan Field Campus  
 Olive Bridge, Ulster Co., NY

477 Beaverkill Road  
 Olive Bridge, NY 12461



Coordinate System: NAD 1983 UTM Zone 18N  
 Projection: Transverse Mercator  
 Datum: North American 1983  
 Units: Meter

0 405 810 1,620 Feet





**Ashokan Field Campus Historic District** **DRAFT**  
Name of Property

**Ulster, New York**  
County and State



Ashokan Field Campus Historic District Site Plan

**EXHIBIT "B"**  
**"Ashokan Field Campus Historic District Photo Key"**



**Ashokan Field Campus Historic District** **DRAFT**  
Name of Property

**Ulster, New York**  
County and State



Ashokan Field Campus Historic District Photo Key

**EXHIBIT "C"**  
**DEP Aerial GIS Map**







TO: State Review Board

FROM: Kathleen LaFrank and Jennifer Betsworth

RE: Ashokan Field Campus Historic District: Response to DEP Memo Questioning Significance and Integrity

DATE: 27 November 2018

### Background

The Ashokan Field Campus Historic District was originally proposed for nomination in 2016 by the Ashokan Center (a private non-profit foundation). Jennifer Betsworth made a site visit and in fall 2016, and, after receiving a request, wrote an initial determination of eligibility in November 2017. After providing advice and guidance to the sponsor and consultant, we received a final draft nomination prepared for the foundation by consultant Neil Larson, of Larson Fisher Associates, in June 2018. After a review that the draft met documentation standards, we notified owners and officials in July 2018 that the nomination was scheduled for review by the State Board for Historic Preservation (SRB) in September SRB. There are *four owners*: the Ashokan Center (141.23 acres); New York City Department of Environmental Protection (219.29 acres), and two private owners, Edward and Gregory Suarez (5.6 acres). After notification, NYC DEP, one of the four owners, requested a postponement for one meeting in order to prepare a report on the district's eligibility. That postponement was granted. In September 2018 we re-notified owners and officials that the nomination would be considered for review by the SRB in December 2018.

### Issues

1. On November 8, 2018, NYC DEP submitted a notarized objection to the nomination. However, under the National Historic Preservation Act, only owners of *private property* may object to nominations. DEP, a New York City agency, is a public owner and has no right to object. Even if DEP did have the right to object to the National Register listing, it is only one of four owners, so its objection could not halt the listing, as no other owners have objected. No owner, public or private, has the right to object to listing under the State Historic Preservation Act.

2. NYC DEP has also submitted a report challenging the eligibility of the nomination. DEP has raised numerous issues, including the fact that the district is "too large," that a "majority of the contributing resources have been compromised," that the "historic significance has been compromised," and that "the application lacks a substantial amount of required discussion and contains numerous inconsistencies." Although the report contains a substantial amount of discussion and quotes numerous NPS regulations and guidance documents, it primarily faults three major premises of the nomination: the boundary, the period of significance, and the integrity of the resources.



In general, DEP's challenges are based on a misunderstanding of the argument for the significance of a large and complex district with multiple layers of significance over a long period of time. Whereas the nomination argument was based on the overall significance of a cultural landscape and how the individual components of that landscape *together* illustrate the larger themes represented, DEP primarily analyzed the individual architectural components, arguing that small changes to individual buildings made then individually non-contributing and, thus, that the district itself was not eligible. In addition, in focusing almost exclusively on the individual architectural elements, DEP showed that it was not familiar with how we evaluate contributing resources in districts; that is, that they contribute to the whole rather than being evaluated as individually significant. DEP also misunderstood some of the NPS definitions for the criteria exceptions, such as those for reconstructions, moved buildings and commemoratives, thus leading it to make judgements about which buildings might be contributing or not as if they were being individually nominated. In addition, architecture is only one of five areas of significance (the others are settlement, industry, education, and recreation), and DEP did not consider how the landscape components also represent the significant themes and contribute to our understanding of the resource. Finally, DEP did not consider the most important thematic component of the nomination, the use of the historic, natural and cultural landscape itself in the development of outdoor educational programs.

#### Specific areas challenged:

##### Period of Significance and Boundary

DEP stated that the period of significance *does not logically and appropriately relate to the boundary*.

A *period of significance* is drawn based on the following information: theme, place, time, and integrity. A resource is significant because it represents important themes in local, state or national history and because there are resources that are intact enough to represent those themes during a certain period of history. This historic district is a large and complex one representing four distinct eras: farm and mill era (1731-1857); pulp and paper manufacturing era (1857-1914); country estate era (1932-1937); and environmental education campus era (1957-1970). The district retains evidence of each of these four periods; specific resources constructed during the stated four periods survive to illustrate the themes of settlement, architecture, industry, recreation, and education. The period of significance was appropriately drawn to encompass the property's long, rich and varied history and to include all the significant resources associated with each of the themes represented.

DEP has also challenged the boundary as *too large and not distinguishable from the surrounding properties by changes such as density, scale, type, age, style, etc.* DEP argued that the boundary should be limited to the small concentration of buildings, citing, for example, the fact that the nomination author has included a detail map of this concentration as part of the evidence that anything outside the detail map is extraneous. Such a detail map is provided for clarification and photo identification and is not part of the boundary justification. While DEP is correct that boundaries should be

distinguishable, the types of physical features mentioned are not meaningful unless they are directly related to the precise history of the property being nominated and here they are not. These questions might be more relevant in an urban residential district where they might be used to define a neighborhood; however, these buildings do not constitute a neighborhood. The larger problem is that DEP does not seem to accept the argument that the significance of the property is greater than that represented only by the architecture of the buildings.

*Boundaries* are drawn to encompass the entire historic significance of the property; they should include the fullest extent of the historic resource, including all relevant historic features. Boundaries relate directly to the historic themes and the period of significance and, for rural historic districts, almost always include more than just buildings, encompassing historic landscapes, agricultural fields, circulation systems, industrial sites, recreational landscapes, etc. In this district, the opening sentence states that the district is significant for its *illustration of several centuries of continued development of a large tract of land in the Catskill Mountain region of New York State*, beginning with late eighteenth-century Winchell farm and the Winchell family's industrial development of Winchell Falls, followed by its use in the early twentieth-century wood pulp manufacturing industry by several prominent companies, and finally by its mid-twentieth century redevelopment as a children's camp applying an early innovative outdoor education program affiliated with a New York State teachers college. It is also significant for its architectural resources, including its eighteenth-century settlement and those associated with its recreational use in the 1930s. The district boundary was drawn to include the resources associated with these themes. In the significance statement, the nomination author laid out a full explanation, with deed references, for the history, development, and significance of the 359-acre parcel:

**eighteenth century** – full size of 1731 deed is not known; however; resources associated with this theme include the original Winchell-Moehring House, the falls dam site, the foundation site

**nineteenth century** – by 1887, water rights and wood pulp mill had been acquired by Hudson River Pulp and paper; old mill destroyed and rebuilt; new dam and mill were developed 1895-1897; DePont took over the pulp mills on the Esopus in 1905; resources associated with this theme include the Hudson River Pulp & Paper manufacturing dam and mill site, the homestead site

**twentieth century** – 1930-1944; Moehring began assembling tracts totaling 200 acres at Winchell's Falls for recreational purposes; he purchased land, including mill holdings and what remained of Winchell Farm; subsequent purchases include parcels of 95, 73, and 13 acres; resources associated with these purchases include the restored and revitalized Winchell-Moehring House, Moehring Barn, wellhouse

**twentieth century** – 1957 New Paltz purchased 359 acres at Winchell's Falls specifically to create a college campus for recreation and environmental education; this purchase included much of the land associated with the previous three periods that had been consolidated by the purchases in the early twentieth century; resources associated with this theme include Wiggly bridge, picnic pavilion, sauna, pewter shop, print shop, glass shop/blacksmith shop, wagon shed, granary, smokehouse, campsite with lean-tos



The 1957 purchase of 359 acres established the boundary for the nomination. The theme of outdoor education and recreation is the most important one recognized in the nomination and is fully developed and justified in the significance statement. The Ashokan Field Campus is proposed for nomination under this theme at the *state level* because of its association with the development of outdoor education programs in association with the state teachers college at New Paltz in the period 1957-1970. In evaluating the full significance of the property, the core campus buildings reflect only a small part of the program's mission and activity. The innovative environmental education program established here, which focused on exposing children to the natural and cultural environment, learning outside the classroom, promoting the physical and mental fitness of American youth, learning traditional crafts, and teaching courses in fields such as botany, ecology, and conservation, was premised on the idea of experiencing the outdoors and using nature itself as a campus. Educators used the surrounding property, the remains of the previous centuries of occupation on the land, features such as woods, streams, abandoned roads, an old log chute, the ruins of earlier buildings, etc., to teach about the natural and cultural environments, and they developed this land with additional resources that would help them provide recreational opportunities, provide instruction in traditional crafts, and advance educational curriculums. The surrounding land, which was used for hiking, swimming, camping, and educational programming, was directly associated with this major theme. While examples of historic architecture relate to the historic themes represented, architecture is only one small aspect of this district's significance.

#### Integrity of the buildings:

DEP cites a large number of buildings that it believes should not contribute to the significance because they are "substantially reconstructed," because they are "commemorative," because "they have been moved," because they have "varied uses over time," and/or because "it is unclear how they contribute to the historic significance."

For those that DEP describes as *substantially reconstructed*, it cites evidence such as replacement roofs or the addition of solar panels. One example is the Moehring Barn, c1937. Changes such as a new roof or the addition of a solar panel would seldom be enough to render any building non-contributing (although a thoroughly incompatible change in form and size might prompt a careful review of an *individual* building significant *only* for its style). In the case of this barn, the nomination presents a complete history of the barn, noting that it incorporates a possible eighteenth-century foundation, which relates to the earliest use of the property; that it was constructed in 1937, which is one of the major periods of thematic development (resort period); that the camp's first blacksmith forge was installed in its basement, which led directly to its use for education purposes (which is associated with the most important theme of the district, environmental education) and that it is still in use; and that the barn is the centerpiece of a c1970 farmyard compound (which is also directly related to the major historic theme for which the property is being nominated). Item 8 of the nomination has a complete history and analysis of this aspect of the property's significance. Further, DEP misuses the term *reconstruction*, which the NPS considers a building in which *all or most of the fabric is not original*. By no standard used for the NPS are any of the buildings at Ashokan

*substantially reconstructed*, and the judgment of contributing and non-contributing has been carefully made for all district buildings.

DEP cites buildings built following traditional methods of construction as “*commemoratives*.” The NPS definition of a commemorative is one that is purposefully designed to commemorate an *important event in the past after that event*. They *derive their aesthetic values from the period of their creation* and they require that some kind of *commemorative activity* occur in remembrance of that event. Campus buildings designed based on historic models and using traditional construction methods might be discussed in the ongoing tradition of reinterpreting the past, but here they relate directly to the theme of educating students about historic folkways and crafts. They do not commemorate a historic event; they do not have a contemporary design that reflects the aesthetic values of the 1970s, and no activity commemorating a past event takes place there. Instead, they are designed based on historic models and are directly related to the campus’s educational program, which is one of the major themes of the nomination. Thus, they are important contributing features. They do not meet the definition of commemoratives and do not have to meet the criterion exception.

DEP cites *buildings that have been moved*. Buildings that have been *moved during the period of significance and relate to the property’s significance* do not have to meet the criterion consideration for moved buildings. These buildings were moved specifically to be used in the working museum village and rural craft educational function that is one of the major themes of the nomination itself.

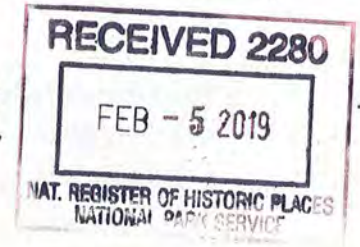
DEP cites buildings that have *varied uses over time*, such as the Winchell-Moehring House, as not relating to the significance of the Ashokan Field Campus. Change over time is one of the most enduring concepts of historic preservation, and the significance statement thoroughly documents the long and significant history of the buildings in the district. The Winchell-Moehring House, for example, is architecturally significant as a prominent surviving example of a late eighteenth century dwelling with commercial lodging functions that generally retains its original form and appearance. It also incorporates 1930s changes by an important regional architect known for his contemporary interpretations of historic architecture in “revival” styles that employ features of regional “Dutch” buildings. During this period, the building’s function reflected a second important theme, recreation. The building was then reused over the last fifty years for environmental education programs, the district’s most important theme. Rather than impacts to integrity, these many layers of architectural and functional changes are the essence of its significance.

DEP also cites several resources because it is unclear *how they contribute to the district’s significance*. These include the picnic pavilion, the sauna, and the campsite. These all fall within the themes of recreation and education, which are fully documented in item 8, which explains the importance of recreational activity in the environmental education program.





January 22, 2019



Joy Beasley  
Keeper of the National Register  
Associate Director of Cultural Resources  
Department of the Interior - National Park Service  
1849 C Street, NW – Mail Stop 7228  
Washington, DC 20240

Julie H. Ernstein, Ph.D., RPA  
Acting Chief, National Register & National Historic Landmarks Program  
Deputy Keeper of the National Register  
Department of the Interior - National Park Service  
1849 C Street, NW – Mail Stop 7228  
Washington, DC 20240

Re: The Ashokan Field Campus Historic District National Register Nomination

Dear Ms. Beasley and Ms. Ernstein:

The New York City Department of Environmental Protection (DEP) submits this comment letter in regards to the New York State Historic Preservation Officer's (SHPO) nomination of The Ashokan Field Campus Historic District's (District) for listing in the National Register of Historic Places. As the agency responsible for delivering high quality and plentiful water to half the population of New York State, DEP respectfully requests that in the Department of the Interior's (DOI) review of this nomination, it consider the vital role of DEP's infrastructure located within the bounds of the District. DEP is mindful of the need to preserve historical resources, while ensuring it has the required flexibility to utilize its assets that fall within the District.

New York City's water supply system, which is one of the oldest, largest and most complex surface water supplies in the world, is comprised of three separate reservoir systems: the Croton, the Catskill and the Delaware. DEP, as the operator of the system, provides an average of 1.1 billion gallons of water to nine million New York City residents and visitors in addition to one million residents living north of the City in Orange, Putnam, Ulster, and Westchester counties.

**Vincent Sapienza, P.E.**  
*Commissioner*

**Paul V. Rush, P.E.**  
Deputy Commissioner  
Bureau of Water Supply  
prush@dep.nyc.gov

P.O. Box 358  
Grahamsville, NY 12740  
T: (845) 340-7800  
F: (845) 334-7175



The District falls within the Catskill water supply system and encompasses property and critical water supply assets owned by New York City. In particular, the Ashokan Release Channel (ARC) runs through two DEP-owned parcels that comprise a portion of the District. As explained below, ARC is an important asset in enabling DEP to operate the Catskill system as an unfiltered supply, in compliance with the federal Safe Drinking Water Act and Surface Water Treatment Rule (SWTR), and it is imperative that DEP has the continued flexibility to operate and adjust ARC as needed to ensure the water supply system remains in compliance with these laws.

ARC is a concrete canal, constructed in the early 1900s, that is used to convey water from the Ashokan Reservoir—currently up to 600 million gallons per day—in a controlled manner from the reservoir through the upper and lower gate chambers to the Old Esopus Creek. DEP's strategic use of ARC enables it to address water quality concerns that can arise during, and following, intense storm events. In addition, ARC can be used proactively to benefit the surrounding communities by enabling DEP to create a void in the Ashokan Reservoir upstream of ARC, thus making room in the Ashokan Reservoir to capture additional flows before a large storm event or when seasonal runoff is expected to be high. For these reasons, DEP's continued use of ARC assists DEP in ensuring the delivery of high quality water during such events, as well as complying with the stringent federal and state requirements to maintain an unfiltered supply.

DEP and the City of New York have a deep appreciation for the preservation of historically significant properties. That said, DEP also has concerns about the inclusion of the City's property as part of the District. See attached letter of objection and comments articulating these concerns, which DEP submitted to SHPO on November 8, 2018 (SHPO Comments). DEP requests that DOI and the Keeper be mindful of these concerns in reviewing the District's nomination. In the event DOI and the Keeper determine that the District is eligible and/or approved for listing, DEP urges DOI and the Keeper to consider revising and limiting the boundary line of the District before making such determination, as suggested by DEP in the SHPO Comments. Alternatively, in the event DOI and the Keeper determine the District to be eligible and/or confirmed for listing with the boundary line as-is, then DEP requests that DOI and the Keeper recognize, in making this determination, the critical role of ARC and the City's need for flexibility in its future use, despite its location within the District.

Thank you for your time and consideration in this matter.

Sincerely,



Paul V. Rush, P.E.

Deputy Commissioner



- c: Rose Harvey, State Historic Preservation Officer
- Daniel Mackay, Deputy State Historic Preservation Officer
- David Warne, DEP Assistant Commissioner, Bureau of Water Supply
- Robin Levine, DEP, Bureau of Legal Affairs
- Casey McCormack, DEP, Bureau of Legal Affairs
- Daniel Mulvihill, DEP, Bureau of Legal Affairs





**Attachment**

SHPO Comments - November 8, 2018

Commissioner of the State Office of Historic Preservation  
New York State Office of Historic Preservation  
60 West Street  
Albany, NY 12242

Dear Commissioner, I am writing to you regarding the proposed changes to the State Office of Historic Preservation's (SHPO) policies and procedures. I have reviewed the proposed changes and have several comments that I would like to share with you. I believe these changes are necessary to ensure the SHPO's continued success in its mission to preserve and protect New York State's historic resources.

The proposed changes to the SHPO's policies and procedures are as follows:

- 1. The proposed changes to the SHPO's policies and procedures are necessary to ensure the SHPO's continued success in its mission to preserve and protect New York State's historic resources.
- 2. The proposed changes to the SHPO's policies and procedures are necessary to ensure the SHPO's continued success in its mission to preserve and protect New York State's historic resources.
- 3. The proposed changes to the SHPO's policies and procedures are necessary to ensure the SHPO's continued success in its mission to preserve and protect New York State's historic resources.

I believe these changes are necessary to ensure the SHPO's continued success in its mission to preserve and protect New York State's historic resources. I would like to discuss these changes with you and your staff. Please let me know if you would like to schedule a meeting to discuss these changes. I am available to meet on any day of the week between 9:00 AM and 5:00 PM. I can be reached at [phone number] or [email address].

Sincerely,  
[Name]

STATE OF NEW YORK  
OFFICE OF HISTORIC PRESERVATION  
60 WEST STREET  
ALBANY, NY 12242  
TEL: 518/474-3200  
FAX: 518/474-3201  
WWW.SHPO.NY.GOV



**Vincent Sapienza, P.E.**  
*Commissioner*

**Paul V. Rush, P.E.**  
Deputy Commissioner  
Bureau of Water Supply  
prush@dep.nyc.gov

P.O. Box 358  
Grahamsville, NY 12740  
T: (845) 340-7800  
F: (845) 334-7175

November 8, 2018

**Commissioner Rose Harvey**  
New York State Historic Preservation Officer  
Commissioner of Parks, Recreation and Historic Preservation  
P.O. Box 189  
Waterford, NY 12188

**Deputy Commissioner R. Daniel Mackay**  
Deputy Commissioner for Historic Preservation  
Deputy State Historic Preservation Officer  
NYS Parks, Recreation and Historic Preservation  
P.O. Box 189  
Waterford, NY 12188

**Re: The Ashokan Field Campus Historic District**  
477 Beaverkill Road,  
Olive Bridge, NY 12461  
Ulster County

Dear Commissioner Harvey and Deputy Commissioner Mackay:

I am writing on behalf of the City of New York ("City") and the New York City Department of Environmental Protection ("DEP") who hereby object to and comment on the designation and listing of the "Ashokan Field Campus Historic District" ("Proposed District") in the National and New York State Registers of Historic Places in accordance with 36 CFR §60.6(g) and 9 NYCRR §427.4 respectively.

The Proposed District spans three parcels in Ulster County, New York, two of which are owned by the Ashokan Foundation, Inc. ("AFI Parcels"), one of which is owned by the City, by and through DEP ("DEP Parcel"). On August 21, 2018, DEP received a notice letter from Deputy Commissioner Mackay ("Notice Letter") that stated the Proposed District was being considered by the New York State Board of Historic Preservation for listing in the National and State Registers of Historic Places, and that the DEP Parcel was one of the properties comprising the Proposed District. DEP Assistant Commissioner Dave Warne subsequently requested a copy of the National Register of Historic Places Registration Form that was submitted to your office nominating the Proposed District for listing consideration ("Nomination Application"), for DEP's review and comment, which he received from your office via email on August 30, 2018. On September 10, 2018, DEP requested via letters and emails addressed to each of you that the State Board's consideration of the Proposed District be postponed in accordance with 9 NYCRR 427.4(d) to allow DEP additional time to review the Nomination Application and prepare comments thereto. Division Director Michael F. Lynch notified DEP via email on September 11, 2018 that Deputy



Commissioner Mackay had granted DEP's request for extension to November 9, 2018, to which he attached a signed letter from the Deputy Commissioner effectuating same ("Extension Letter").

Upon further review of the Nomination Application in conjunction with all applicable federal and state law, and supplemental technical guidance bulletins published by the National Parks Service, DEP, acting on behalf of the City as the sole fee simple owner of the DEP Parcel, hereby formally objects to the nomination and listing of the Proposed District in the National Register of Historic Places pursuant to 36 CFR §60.6(g), and in particular, to the inclusion of the DEP Parcel within the Proposed District's boundary line.


DEP submits the attached comments to the Nomination Application ("Comments") in accordance with 9 NYCRR §427.4, and consistent with the submission requirements noted in the Deputy Commissioner's Extension Letter dated September 11, 2018. As further detailed in the attached Comments, DEP contests the eligibility of the Proposed District for listing in both the State and National Registers of Historic Places for the following reasons:

- I. The boundary of the Proposed District is too large and thus is improper for listing in both the National and State Registers as proposed;
- II. The integrity of a majority of the Proposed District's contributing resources have been compromised, and the Applicant has not properly discussed or demonstrated that these contributing resources individually and/or collectively qualify the Proposed District for any of the Criteria Considerations enumerated in 36 CFR §60.4;
- III. Due to the aforementioned contributing resource integrity issues, the historic significance of the Proposed District is compromised, thereby negating the Proposed District's eligibility for listing; and
- IV. The Nomination Application as submitted is incomplete, lacks a substantial amount of required discussion and information, and contains numerous inconsistencies, and therefore should be deemed incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time.

DEP respectfully requests that the SHPO and the State Board carefully consider the attached Comments in conjunction with their review(s) of the Nomination Application, and collectively conclude that, based upon the current state of the Nomination Application, the Proposed District is ineligible for listing in the National and State Registers.

Please confirm your timely receipt of this letter and the enclosed Comments. Thank you for your time and consideration.

Sincerely,



Paul V. Rush, P.E.

Deputy Commissioner



c: **Michael Lynch, Division Director, NYS Division for Historic Preservation**  
**David Warne, Assistant Commissioner, DEP Bureau of Water Supply**  
**Casey McCormack, Assistant Counsel DEP Bureau of Legal Affairs**  
**Daniel Mulvihill, Senior Environmental Counsel, DEP Bureau of Legal Affairs**  
**Robin Levine, Senior Environmental Counsel, DEP Bureau of Legal Affairs**

BARBIE A. JAMES  
1000 W. 12th St.  
New York, NY 10014  
Tel: 212-264-1234



**ACKNOWLEDGEMENT**

STATE OF NEW YORK

SS:

COUNTY OF Sullivan

On the 8<sup>th</sup> day of November in the year 2018 before me, the undersigned, personally appeared **PAUL V. RUSH**, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed same in his capacity, and that by his signature on the within instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

*Pamela Zanetti*

Notary Public

Printed Name: Pamela Zanetti

My Commission Expires:

8/31/22

**PAMELA ZANETTI**  
Notary Public, State of New York  
Residing in the County of Sullivan  
Commission Expires Aug. 31, ~~2018~~ 2022  
Reg. No. 01ZA4714481



**COMMENTS ON THE ASHOKAN FIELD CAMPUS HISTORIC DISTRICT  
NOMINATION APPLICATION TO  
THE STATE & NATIONAL REGISTERS OF HISTORIC PLACES**

**Background**

The City of New York ("City") and the NYC Department of Environmental Protection ("NYCDEP") (the City and NYCDEP shall hereinafter collectively be referred to as "DEP") in accordance with 9 NYCRR §427.4, jointly submit this written statement containing DEP's comments on the National Register of Historic Places Registration Application prepared by Larson Fisher Associates, Inc. ("Applicant") nominating the Ashokan Field Campus Historic District ("Proposed District") for concurrent listing in the New York State and National Registers of Historic Places ("Nomination Application"). The Proposed District is comprised of three parcels located in Ulster County, New York, two of which are owned by the Ashokan Field Institute, Inc. ("AFI Parcels"), and one of which is owned by DEP ("DEP Parcel"). As further explained in the Comments below, DEP believes the Proposed District is ineligible for listing in both the State and National Registers for the following reasons:

- I. The boundary of the Proposed District is too large and thus is improper for listing in both the National and State Registers as proposed;
- II. The integrity of a majority of the Proposed District's contributing resources have been compromised, and the Applicant has not properly discussed or demonstrated that these contributing resources individually and/or collectively qualify the Proposed District for any of the Criteria Considerations enumerated in 36 CFR §60.4;
- III. Due to the aforementioned contributing resource integrity issues, the historic significance of the Proposed District is compromised, thereby negating the Proposed District's eligibility for listing; and
- IV. The Nomination Application as submitted is incomplete, lacks a substantial amount of required discussion and information, and contains numerous inconsistencies, and therefore should be deemed incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time.

DEP respectfully requests that the New York State Board of Historic Preservation, the New York State Historic Preservation Officer, the National Parks Service and the Keeper of the National Register of Historic Places carefully consider these comments in conjunction with the Nomination Application, and respectively conclude that the Proposed District is ineligible for listing in the National and State Registers at this time.

**Comments**

DEP offers the following comments in support of its position that the Proposed District is ineligible for listing in the State and National Registers at this time:



**I. The boundary of the Proposed District is too large and thus is improper for listing in both the National and State Registers as proposed;**

**A. Governing Regulations & NPS Technical Guidance**

36 CFR §60.3 defines a "District" as "a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history."<sup>1</sup> The National Register Bulletin No. 15, *How to Apply the National Register Criteria for Evaluation* ("NRB 15") further contextualizes this definition by stating: "A district derives its importance from being a unified entity ... [it] must be a definable geographic area that can be distinguished from surrounding properties by changes such as density, scale, type, age, style of sites, buildings, structures, and objects, or by documented differences in patterns of historic development or associations. It is seldom defined, however, by the limits of current parcels of ownership, management or planning boundaries. The boundaries must be based upon a shared relationship among the properties constituting the district."<sup>2</sup>

Section 10 of the National Register Registration Application Form requires applicants to include a Boundary Justification statement that provides an explanation of the reasons for the applicant's selection of the proposed boundary for the nominated historic property or district.<sup>3</sup> National Register Bulletin No. 16A, titled *How to Complete the National Register Registration Form* ("NRB 16A"), further explains the required level of detail to be included in the justification statement, and specifically notes that "Properties with substantial acreage require more explanation than those confined to small city lots."<sup>4</sup> In addition, NRB 16A lists the following guidelines for applicants to review and consider while choosing an appropriate boundary line for a property or district:

**1. For All Properties:<sup>5</sup>**

- a. Carefully select boundaries to encompass, but not exceed the full extent of the significant resources and land area making up the property.

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<sup>1</sup> 36 CFR §60.3. *Note*, in the instant case, the Proposed District has been concurrently nominated for listing in both the State and National Registers. Pursuant to 9 NYCRR §427.1(a), in the event of a concurrent listing proposal, review for listing in the State register shall primarily be done in accordance with the National Register nomination review process: "(a) Except as provided for in subdivision (b) of this section, all proposals for the listing of properties on both the National Register and State Register shall be submitted, reviewed and acted upon in accordance with the regulations governing the *National Register* (emphasis added) ...". Unless specifically noted otherwise herein, all analyses discussed in this document will have been undertaken and performed through the lens of the applicable federal regulatory analysis mechanisms as required by 36 CFR Part 60, and also in compliance with 9 NYCRR §427.1.

<sup>2</sup> See, National Register Bulletin No. 15, *How to Apply the National Register Criteria for Evaluation*, <https://www.nps.gov/nr/publications/bulletins/nrb15/>, p. 5-6 (hereinafter "NRB 15").

<sup>3</sup> See, National Register Bulletin No. 16A, *How to Complete the National Register Registration Form*, <https://www.nps.gov/nr/publications/bulletins/nrb16a/>, p. 54-57, Appendix IV:I (hereinafter "NRB 16A").

<sup>4</sup> *Id.* at 55

<sup>5</sup> *Id.* at 56



- b. The area to be registered should be large enough to include all historic features of the property, but should not include "buffer zones" or acreage not directly contributing to the significance of the property.
  - c. Leave out peripheral areas of the property that no longer retain integrity, due to subdivisions, development or other changes.
2. *Specifically For Historic Districts:*<sup>6</sup> Select boundaries to encompass the single area of land containing the significant concentration of buildings, sites, structures, or objects making up the district. The district's significance and historic integrity should help determine the boundaries. Consider the following factors:
- a. Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character.
  - b. Visual changes in the character of the area due to different architectural styles, types or periods, or to a decline in the concentration of contributing resources.
  - c. Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch.
  - d. Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.

#### **B. Analysis & Application to Proposed District**

The Proposed District in this instance spans 359.82 acres, and the boundary is explained by the Applicant in the Boundary Justification portion of the Nomination Application's Section 10 as follows: "The boundary was drawn to encompass the tract assembled by the New York State Teachers College at New Paltz for the Ashokan Field Campus in 1957."<sup>7</sup>

Immediately following Section 10 are four aerial maps of the Proposed District, which have been collectively attached hereto as Exhibit "A" for your review in conjunction herewith. The first three maps depict the outer boundary points of the Proposed District as viewed from various heights and scales, all of which are clearly measurable and discernable using the informational keys provided at the bottom of each of the respective maps.<sup>8</sup> The fourth map/site plan, titled, "Ashokan Field Campus Historic District Site Plan" ("Site Plan"), is an unscaled aerial photograph showing a small fraction of the acreage comprising the Proposed District. The exact amount of acres and scale of this Site Plan is unascertainable given the information provided by

<sup>6</sup> *Id.* at 56-57

<sup>7</sup> Nomination Application p. 29.

<sup>8</sup> DEP understands and acknowledges that these three maps were included in the Applicant's Nomination Application to fulfill the Verbal Boundary Description requirements of Section 10.



the Applicant. However, DEP staff familiar with the property confirmed upon review that the Site Plan did in fact depict a small, concentrated area within the Proposed District boundary that is home to a large majority of the Nomination Application's listed complying and non-complying structures, sites and buildings ("Site Plan Area").<sup>9</sup> In addition, the Applicant also included a fifth aerial map/photograph, titled "Ashokan Field Campus Historic District Photo Key" on page 38 of the Nomination Application, which is attached hereto as Exhibit "B" and attempts to numerically depict the approximate locations of all of the contributing and non-contributing resources found throughout the Proposed District.<sup>10</sup> As was the case with the preceding Site Plan, this fifth aerial image also fails to disclose the amount of acreage shown in the photo or the scale/height at which the image was taken. In addition it fails to show the greater boundary line of the Proposed District in relation to the concentration of contributing and noncontributing resources labeled numerically thereon.

In an effort to better understand the boundary of the Proposed District in conjunction with the location of the concentration of contributing and noncontributing resources discussed in the Nomination Application, DEP composed an aerial map of the Proposed District using its in-house Geographic Information Systems technology. This map, which is attached hereto as Exhibit "C", shows, among other things, the total boundary lines of the 359.82-acre Proposed District, as well as the general location of the Site Plan Area referenced above.<sup>11</sup> A plain review of this map supports the conclusion that the boundary of the Proposed District far exceeds the concentrated Site Plan Area. In addition, when this map is viewed alongside the Applicant's fifth aerial image attached hereto as Exhibit "B", DEP's position that the contributing and noncontributing resources are concentrated in a specific, smaller area of the Proposed District, is only further reinforced.

As aforementioned in the Governing Regulations & NPS Technical Guidance Section above, a District is "a geographically definable area ... possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development."<sup>12</sup> DEP acknowledges that a *portion* of the Proposed District may be a geographically definable area possessing a significant concentration of sites, buildings, structures, or objects; however notwithstanding, DEP contests the overall boundary of the Proposed District as labeled and justified in Section 10 for the following reasons:

1. The Proposed District's boundary and the encompassing 359.82-acre geographic area is too expansive and as such, is not distinguishable from surrounding properties by changes such as density, scale, type, age, style of

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<sup>9</sup> *Id.* at 33.

<sup>10</sup> *Id.* at 38. *Note*, DEP takes issue with the overall accuracy and numerical formatting used in this map, which it discusses at greater length in Section IV of these Comments.

<sup>11</sup> Due to the lack of information provided in support of the Site Plan, the exact range and acreage of the Site Plan Area could not be depicted on DEP's attached map. Instead, DEP has circled the general Site Map Area in red on its map for your reference and review.

<sup>12</sup> 36 CFR §60.3



sites, buildings, structures, and objects.<sup>13</sup> In fact, the opposite is true. A large portion of the Proposed District is vacant and contains no evidence of historical remnants. Instead these areas are likely nothing more than densely forested woods that house no contributing or noncontributing sites, buildings, structures or objects. As the Applicant noted itself on page 3 of the Nomination Application, "most of the property is second growth forest."

2. The Applicant's boundary justification fails to sufficiently explain the extensive 359.82-acre boundary line of the Proposed District as encouraged by NRB 16A.<sup>14</sup> There are substantial portions of the Proposed District that are indistinguishable with no evidence of significance, and as such, arguably amount to nothing more than improper acreage buffer zones. Without further explanation from the Applicant in the Boundary Justification as to why these additional vacant acres should be included in the Proposed District, the Boundary Justification is insufficient.
3. The forested, indistinguishable areas of the Proposed District lack integrity, stemming from the 2008 tract sale and subsequent subdivision into three parcels whereby DEP acquired ownership of the central parcel for purposes of operation of the NYC Water Supply System, and the Ashokan Field Institute, Inc. acquired the remaining two buffering parcels.

### **Section I Conclusion**

For the reasons set forth above, DEP believes that the boundary of the Proposed District is excessive and as such cannot be included in the National and State Registers at this time.

- II. The integrity of a majority of the Proposed District's contributing resources have been compromised, and the Applicant has not properly discussed or demonstrated that these contributing resources individually and/or collectively qualify the Proposed District for any of the Criteria Considerations enumerated in 36 CFR §60.4;**

#### **A. Governing Regulations & NPS Technical Guidance**

The "Criteria Considerations" section of 36 CFR §60.4 lists certain types of properties that ordinarily, due to their nature, will not be considered or deemed eligible for listing. Properties on this list include, but are not limited to:

- i. Structures that have been moved from their original locations,
- ii. Reconstructed historic buildings, and/or
- iii. Properties primarily commemorative in nature.<sup>15</sup>

<sup>13</sup> See NRB 15 p. 5-6.

<sup>14</sup> NRB 16A at 55

<sup>15</sup> See 36 CFR §60.4



However, 36 CFR §60.4 goes on to list limited, "special circumstances" also known as "criteria considerations", which operate to requalify these ordinarily ineligible properties for listing despite their disqualifying properties:

"such properties will qualify if they are integral parts of districts that do meet the criteria of [*sic*]<sup>16</sup> if they fall within the following categories:

- a. ...
- b. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- c. ...
- d. ...
- e. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- f. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance ....<sup>17</sup>

NRB 15 further clarifies that "the Criteria Considerations need to be applied only to *individual* properties. Components of eligible districts do not have to meet the special requirements unless they make up the majority of the district or are the focal point of the district."<sup>18</sup>

NRB 16A instructs applicants to complete the Criteria Considerations portion of Section 8 of the National Register Registration Application as follows:

"Mark an 'x' in the box for any criteria consideration applying to the property. Mark all that apply. Leave this section blank if no considerations apply ... For **districts**, mark only the criteria considerations applying to the entire district or to a predominant resource or group of resources within the district."<sup>19</sup>

## **B. Analysis & Application to Proposed District**

The Applicant included a narrative description of each contributing and noncontributing resource comprising the Proposed District in Section 5 of its Nomination

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<sup>16</sup> *Note*, this seems to be a drafting error that is contained in the most current version of regulation. Based on additional analysis of NRB 15 p. 25, DEP believes the word "of" as used here, should instead be replaced with the word "or". In the event this interpretation is improper, DEP requests further interpretative guidance from the SHPO and/or the National Parks Service.

<sup>17</sup> *Id.* Note, DEP has only listed the portions of the regulatory exemptions herein that it believes could possibly apply to the Proposed District.

<sup>18</sup> NRB 15 at 25

<sup>19</sup> NRB 16A at 36



Application. However, upon review of applicable federal regulations and NPS technical guidance bulletins, DEP submits that a large number of the Proposed District's purported contributing resources do not qualify as such because their historic integrity has been compromised due to movement, reconstruction, and/or the nature of the property as primarily commemorative in nature.<sup>20</sup>

DEP hereby comments on the following contributing resources in the Proposed District and questions them for their historic integrity and/or significance:

1. **Winchell Moehring House** – this building has been substantially reconstructed and repurposed since it was first built in the 18<sup>th</sup> century. Most recently, in 2015, a metal roof was added to the building, which brings the building's historic integrity into question. In addition, although the building has been in continuous use since the 18<sup>th</sup> century, the types of uses and functional purposes of the structure have varied substantially over time and most of the uses do not directly relate to the operation of the Ashokan Field Campus.
2. **Moehring Barn** – this building has been reconstructed in the last 5 years. According to the description, in 2015, a metal roof was added, and later in 2017, solar panels were installed. Further, this building's uses have varied greatly over time.
3. **Wagon Shed** – a review of the attached photo of this structure indicates that it was possibly reconstructed through the addition of a metal roof and solar panels; however, it is worth noting that this work was not detailed in the description section of the Nomination Application.<sup>21</sup>
4. **Granary** – DEP questions when the concrete elevation of this building occurred as noted in Section 5. Based on the description provided, it is not evident whether the elevation was undertaken at the time the building was erected, or instead at some later date. Further, the description states that the building “was built ... following traditional models to develop a farmyard with buildings *typical of the 19<sup>th</sup> century period*” (emphasis added), which DEP believes, without additional detailed information, is indicative of a structure that is primarily commemorative in nature.
5. **Smokehouse** – the description states that the building “was built ... following *traditional models* to develop a homestead with buildings *typical of the 19<sup>th</sup> century period*” (emphasis added), which DEP believes, without additional detailed information, is indicative of a structure that is primarily commemorative in nature.

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<sup>20</sup> See generally 36 CFR §60.4 *Criteria Considerations (b),(e),(f)*

<sup>21</sup> Note, DEP had some issues identifying each structure based on the attached photos because the photos were not labeled.



6. **Winchell's Falls & Hudson River Pulp & Paper Mfg. Co. Dam and Mill Site** – DEP questions the historic integrity and significance of this resource as a contributing property. Based on the scant information provided in the Section 5 description, it is very unclear how this site, and its historical context, contribute and connect to the Proposed District.
7. **Ashokan – Turnwood Covered Bridge** – this site is presently on the National Register of Historic Places and as such is not counted towards the total count of contributing resources within the Proposed District. It is worth noting that this bridge was substantially reconstructed in 2016 under the direction and supervision of the Ashokan Center. DEP was not involved in the reconstruction project and is unaware of how the work could have or did impact the bridge's National Register listing status.
8. **Print Shop** – as noted in the Section 5 description, this structure was originally built for a law office in Tillson, New York (near New Paltz) and was subsequently moved to its current location by camp staff in 1970. DEP questions this structure's historic integrity as a structure moved from its original location, and as a potentially reconstructed historic building.
9. **Old Foundation, 19th century** – DEP questions the historic integrity and significance of this property as it relates to the historical context and operations of this Ashokan Field Campus Historic District. The description states: "cellar hole for an unknown building with stone walls on four sides believed to be associated with Lemuel Winchell. *The site has been partially disturbed by amateur excavations by campers over the years, but may retain some archaeological potential.*" This site description is vague and raises questions as to how this site qualifies as a contributing source. In addition, in light of the campers' amateur excavation activities, it is arguable that the site's historic integrity has been compromised.
10. **Picnic Pavilion** – the description provided for this structure is extremely vague and it is unclear how this structure contributes to the Proposed District's historic significance.
11. **Sauna** – the description provided for this structure is extremely vague and it is unclear how this structure contributes to the Proposed District's historic significance.
12. **Campsite** – the description provided for this structure is extremely vague and it is unclear how this structure contributes to the Proposed District's historic significance.

As noted in the Governing Regulations & NPS Technical Guidance portion of this Section, generally individual components of eligible districts do not have to be evaluated individually for their integrity and thereafter be found to individually meet the Criteria



Considerations special requirements. However, individual components of districts *will be* evaluated in this way when properties with compromised integrity and any applicable qualifying criteria components, make up the *majority* of the district or are the focal point of the district.<sup>22</sup> In such a case, the relevant criteria considerations potentially applicable the district and/or the district's majority resource group/properties should be acknowledged as such in Section 8, and the applicability should thereafter be discussed by the applicant.

In the instant case, DEP believes that a majority of the contributing properties that comprise the Proposed District have compromised integrity for one or more of the reasons discussed above. In light of this majority integrity issue, DEP questions the overall integrity of the Proposed District, and posits that the Applicant should have completed the Criteria Considerations portion of Section 8 of the Nomination Application in order to appropriately address these integrity issues. Failure of the Applicant to do so amounts to a serious substantive flaw in the Applicant's Nomination Application. Alternatively, the Applicant could have argued that one or more Criteria Considerations applied to the District as a whole; however, this was not done either. No portion of the Criteria Considerations were addressed by the Applicant in Section 8 of the Nomination Application.

### **Section II Conclusions:**

DEP questions the integrity of a majority of the Proposed District's contributing resources and hereby requests that the Applicant either reevaluate the Nomination Application and revise it accordingly to address the above mentioned integrity issues via Criteria Considerations, or alternatively, requests that the State Board and SHPO deny the Proposed District for listing in the National and State Registers at this time because a majority of the Proposed District's contributing resources as described in the Nomination Application have been shown to have compromised integrity without applicable Criteria Considerations.

**III. Due to the aforementioned contributing resource integrity issues, the historic significance of the Proposed District is compromised, thereby negating the Proposed District's eligibility for listing; and**

#### **A. Governing Regulations & NPS Technical Guidance**

The portion of 36 CFR §60.4 titled "Criteria for Evaluation" states:

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*"The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:*

**A. That are associated with events that have made a significant contribution to the broad patterns of our history; or**

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<sup>22</sup> NRB 15 at 25



- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.”<sup>23</sup> (emphasis added)

NRB 15 further guides applicants and regulatory reviewers regarding the proper application of the Criteria for Evaluation to properties and districts:

“For a property to qualify for the National Register it must meet one of the National Register Criteria for evaluation by:

- Being associated with an important historic context, *and*
- Retaining historic integrity of those features necessary to convey its significance.”<sup>24</sup>

In regards to historic significance and integrity of districts and the properties that make up those districts, NRB 15 states:

“A district must be *significant* as well as being an identifiable entity. ... *the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.* A district can contain buildings, structures, sites, objects, or open spaces that do not contribute to the significance of the district. *The number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district's integrity*”<sup>25</sup> (emphasis added).

#### **B. Analysis & Application to Proposed District**

As discussed in Section II above, DEP questions the integrity of approximately 12 of 17 of the Proposed District's contributing resources<sup>26</sup>. In light of the Applicant's failure to address these majority contributing resource integrity issues via discussion and appropriate marking of the Criteria Considerations portion of Section 8 of the Nomination Application, DEP does not think the remaining uncompromised contributing resources individually, or collectively as part of the Proposed District, retain enough historic significance under Criteria A or C as listed in 36 CFR §60.4.

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<sup>23</sup> See 36 CFR §60.4

<sup>24</sup> NRB 15 at 3

<sup>25</sup> *Id.* at 5

<sup>26</sup> Note, the reference to 17 contributing resources is derived from page 2, Section 5 of the Nomination Application. However, DEP is unsure of the total number of contributing resources proposed by the Applicant in the application because the total number (17) listed in Section 5, does not fully match up with the total number of contributing properties listed later in Section 7.



As NRB 15 states, "*the number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district's integrity*"<sup>27</sup> The Applicant's failure to rehabilitate the compromised integrity of the 12 contributing resources listed in Section II significantly impacts the District's integrity as a whole. Once the 12 resources are removed as contributing resources and reallocated as noncontributing, the Proposed District overall is left with just a total of 5 contributing resources, and 26 noncontributing resources (12 of which are have integrity issues) which are all concentrated in one relatively distinct section of the 359.82-acre Proposed District. The only logical conclusion that can result is that the District's overall integrity has been severely compromised, which in turn prevents the District from effectively conveying its sense of time, place, and historical development. As a result, the Proposed District is not historically significant and does not meet Criteria for Evaluation (a) and (c) as stated in the Nomination Application.

In addition, separate and apart from the integrity issue, is the fact that Period of Significance described by the Applicant in Section 8 (spanning 1785 – 1970) does not logically reflect or appropriately relate in any way to the boundary line justification in Section 10.<sup>28</sup> The applicant states the following as the justification for the chosen period of significance:

"The Period of Significance was drawn to encompass the varied and evolving history of the property. It begins with Lemuel Winchell's ca. 1785 house, which may be located on earlier foundations, and extends until ca. 1970, when the majority of the buildings associated with the Ashokan Field Campus, a college-based outdoor education program, had been completed. The property has continued to function as a camp focused on the ecological and cultural history of the Catskills region to the present day."<sup>29</sup>

DEP fails to see how the boundary line is justified or significant when compared against the Applicant's period of significance statement. This analysis only further supports DEP's position that the Proposed District is ineligible for listing at this time because the Applicant has failed to prove its significance, and has also failed to demonstrate that it is an identifiable entity based on its boundary lines and the resources contained therein.

### **Section III Conclusions**

For the above-listed reasons, the resource integrity issues discussed in Section II, and the improper boundary justification discussed in Sections I and III hereof, collectively detrimentally impact the Proposed District's historic significance to such an extent that the District does not qualify for listing under Criteria for Eligibility (A) and (C) (36 CFR §60.4).

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<sup>27</sup> NRB 15 at 5

<sup>28</sup> See generally Nomination Application page 29, stating: "the boundary was drawn to encompass the tract assembles by the New York State Teachers College at New Paltz for the Ashokan Field Campus in 1957."

<sup>29</sup> *Id.* at 12.



**IV. The Nomination Application as submitted is incomplete, lacks a substantial amount of required discussion and information, and contains numerous inconsistencies and errors, and therefore should be deemed incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time.**

**A. Governing Regulations & NPS Technical Guidance**

60 CFR §60.6(k) states:

**(k)** Nominations approved by the State Review Board and comments received are then reviewed by the State Historic Preservation Officer and if he or she finds the nominations to be *adequately documented and technically, professionally, and procedurally correct and sufficient and in conformance with National Register criteria for evaluation*, the nominations are submitted to the Keeper of the National Register of Historic Places, National Park Service, United States Department of the Interior, Washington, D.C. 20240. All comments received by a State and notarized statements of objection to listing are submitted with a nomination”<sup>30</sup> (emphasis added)

Additional review guidance is provided in the National Park Service’s “Technical Review Checklist” and “Substantive Checklist”<sup>31</sup> which respectively highlight the various potential consistency, technical and substantive issues commonly identified by the reviewers.

**B. Analysis & Application to Proposed District**

A cursory review of the Nomination Application using the National Park Service’s “Technical Review Checklist” and “Substantive Checklist” as a guide reveal the following consistency, technical and substantive issues within the Nomination Application. DEP encourages the State Board, SHPO and Keeper to review the Nomination Application with the below spotted issues in mind, and conclude that the Nomination Application as submitted in its current form is incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time

- The total number of contributing and noncontributing resources listed in Sections 5 and 7 are inconsistent.
- The Chart contained on pages 5/6 of the application contains several formatting errors that combine contributing and noncontributing resources into one line item.
- Labeling of Photos and Figures. The photos are referenced by number in the description portions of the Nomination Application, but then are not numbered as appended. Figures are numbered as appended, however some of the Figures are also photos, which resulted in substantial confusion during review.
- The map on page 38 titled “Ashokan Field Campus Historic District Photo Key”– references photos “40, 41, 42” – these are not photos appended or referenced anywhere in the application. They specifically do not correspond with any

<sup>30</sup> 36 CFR §60.6

<sup>31</sup> See *National Review Checklists* available for download at <https://www.nps.gov/nr/publications/forms.htm>



contributing/noncontributing items listed in Section 7, pages 5/6 as the rest of the numbers in the map do.

- Section 7, Resource No. 29 Campsite – is noted as “2 buildings”, but it is unclear whether these two buildings are counted as distinct contributing resources or one single resource.
- Descriptions of the resources in Section 7 are inconsistent in length and detail, and in many places unclear and seemingly incomplete – particularly with respect to the listed items that are labeled contributing resources. The descriptions for these resources becomes more inadequate as the list progresses.
- Alterations that occurred to the listed resources have not been adequately described in the application, or at times even mentioned at all.
- DEP is named at the “Department of Environmental Education” within Application (see page 3 Summary Paragraph).
- Properties have been altered and the differences between the original and current conditions/appearances is not clearly established or described in accordance with the applicable federal regulations.
- Section 3 of the Application is partially completed and should be completely left blank and filled in by State and National Register review agencies.

### **General Conclusion**

DEP, as an interested property owner whose land falls within the Proposed District, hereby submits these Nomination Application comments for review and consideration by New York State Board of Historic Preservation, the New York State Historic Preservation Officer, the National Park Service and the Keeper of the National Register of Historic Places, as applicable, for their respective use and consideration while reviewing Applicant’s Nomination Application and determining the eligibility of the Proposed District for listing in the National and/or State Registers. Based on the reasons set forth above, DEP does not believe the Proposed District is eligible for listing at this time in either the State or the National Register. Should any of the reviewing person(s) or agencies wish to discuss or clarify DEP’s position(s), you may contact:

Casey McCormack,  
Assistant Counsel,  
DEP Bureau of Legal Affairs  
(718) 595 6503



**EXHIBIT "A"**  
**Boundary Maps & Site Plan**

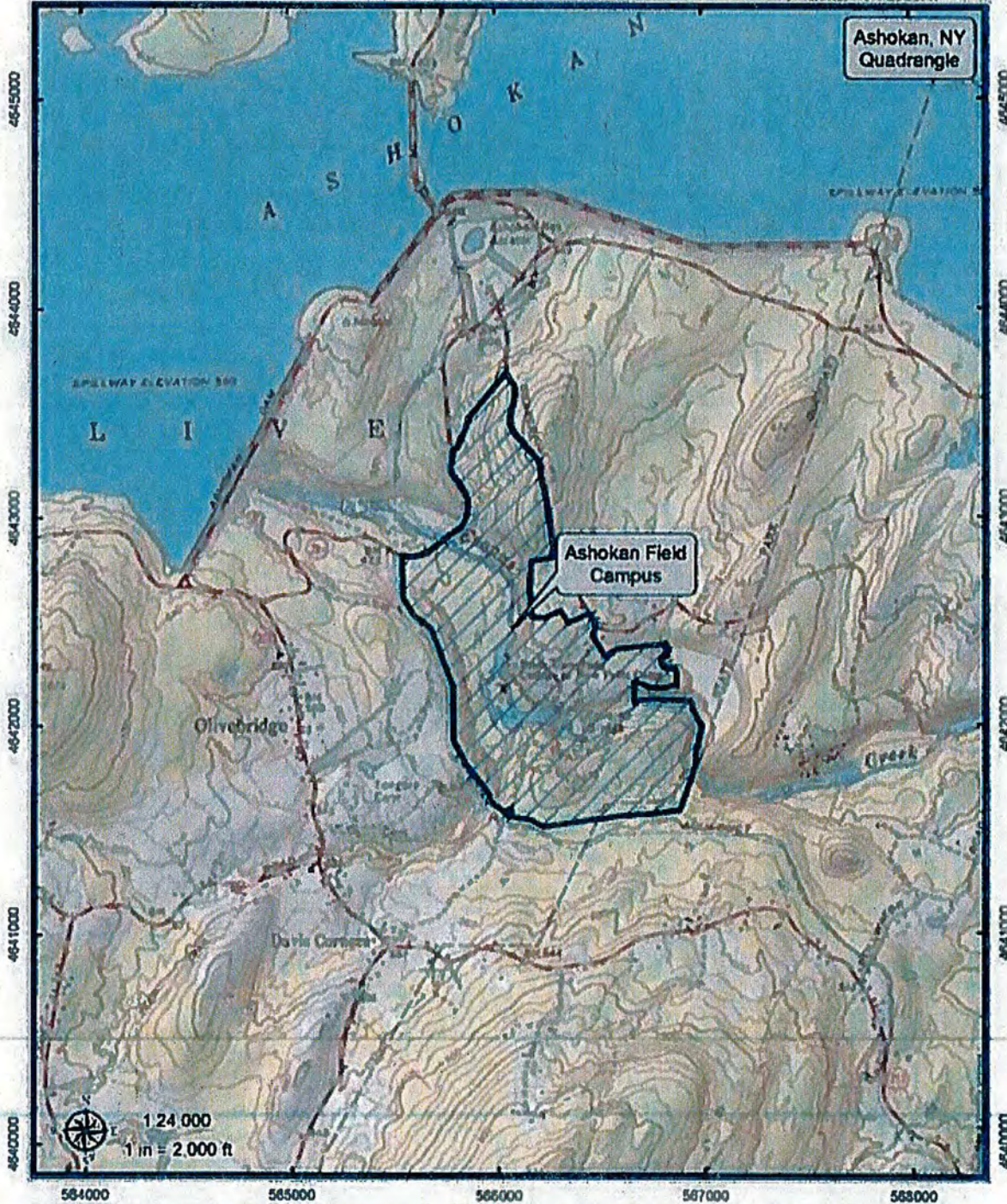


**Ashokan Field Campus Historic District** **DRAFT**  
Name of Property

**Ulster, New York**  
County and State

**Ashokan Field Campus**  
Olive Bridge, Ulster Co., NY

**477 Beaverkill Road**  
Olive Bridge, NY 12461



Coordinate System: NAD 1983 UTM Zone 18N  
Projection: Transverse Mercator  
Datum: North American 1983  
Units: Meter

0 650 1,300 2,600 Feet



Parks, Recreation  
and Historic Preservation  
Division for Historic Preservation

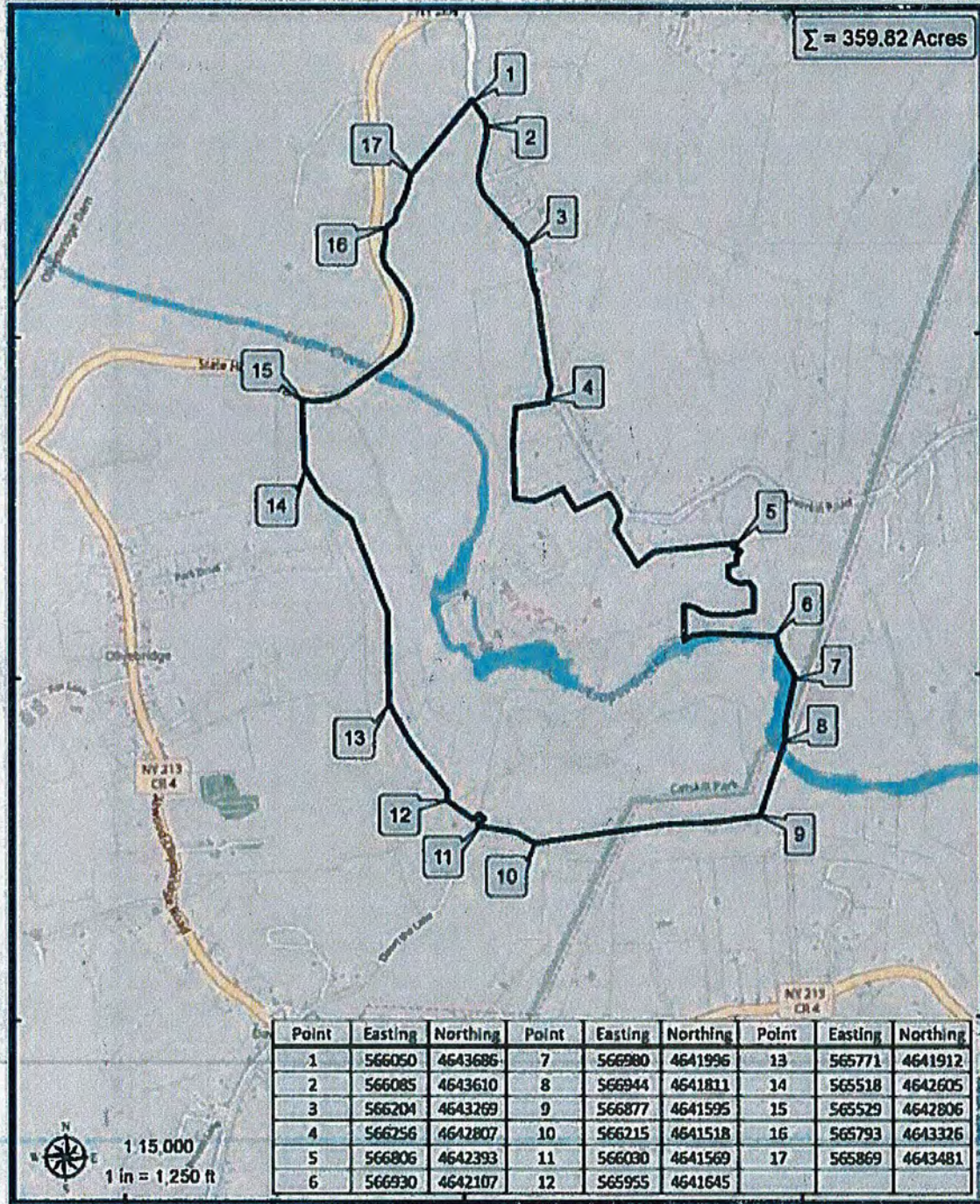


Ashokan Field Campus Historic District **DRAFT**  
 Name of Property

Ulster, New York  
 County and State

Ashokan Field Campus  
 Olive Bridge, Ulster Co., NY

477 Beaverkill Road  
 Olive Bridge, NY 12461



Coordinate System: NAD 1983 UTM Zone 18N  
 Projection: Transverse Mercator  
 Datum: North American 1983  
 Units: Meter

0 405 810 1,620 Feet



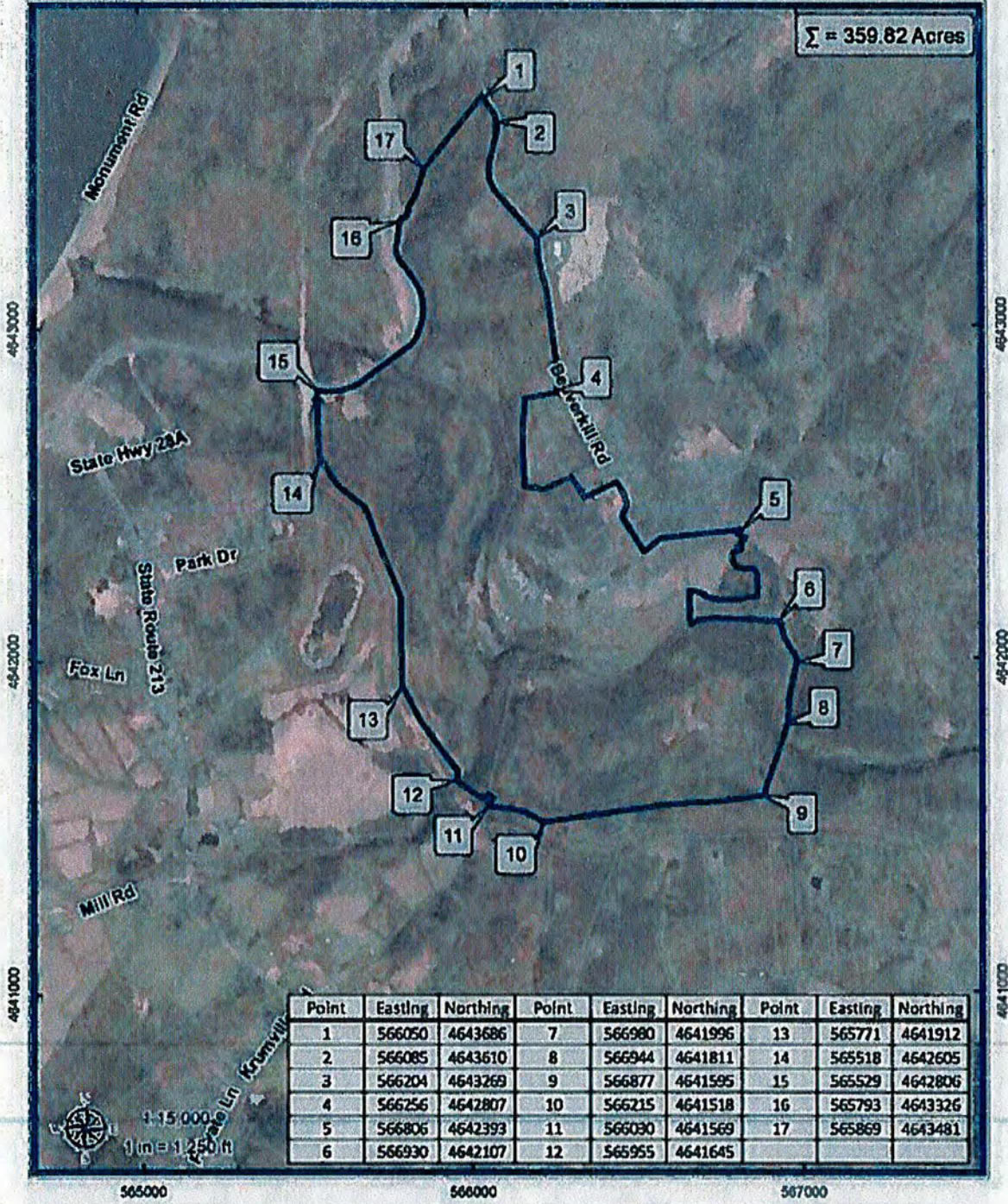


Ashokan Field Campus Historic District **DRAFT**  
 Name of Property

Ulster, New York  
 County and State

Ashokan Field Campus  
 Olive Bridge, Ulster Co., NY

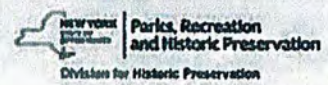
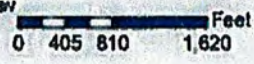
477 Beaverkill Road  
 Olive Bridge, NY 12461



$\Sigma = 359.82$  Acres

Point	Easting	Northing	Point	Easting	Northing	Point	Easting	Northing
1	566050	4643686	7	566980	4641996	13	565771	4641912
2	566085	4643610	8	566944	4641811	14	565518	4642605
3	566204	4643269	9	566877	4641595	15	565529	4642806
4	566256	4642807	10	566215	4641518	16	565793	4643326
5	566806	4642393	11	566030	4641569	17	565869	4643481
6	566930	4642107	12	565955	4641645			

Coordinates System: NAD 1983 UTM Zone 18N  
 Projection: Transverse Mercator  
 Datum: North American 1983  
 Units: Meter





Ashokan Field Campus Historic District **DRAFT**  
Name of Property

Ulster, New York  
County and State



Ashokan Field Campus Historic District Site Plan



**EXHIBIT "B"**  
**"Ashokan Field Campus Historic District Photo Key"**



**Ashokan Field Campus Historic District** **DRAFT**  
Name of Property

**Ulster, New York**  
County and State

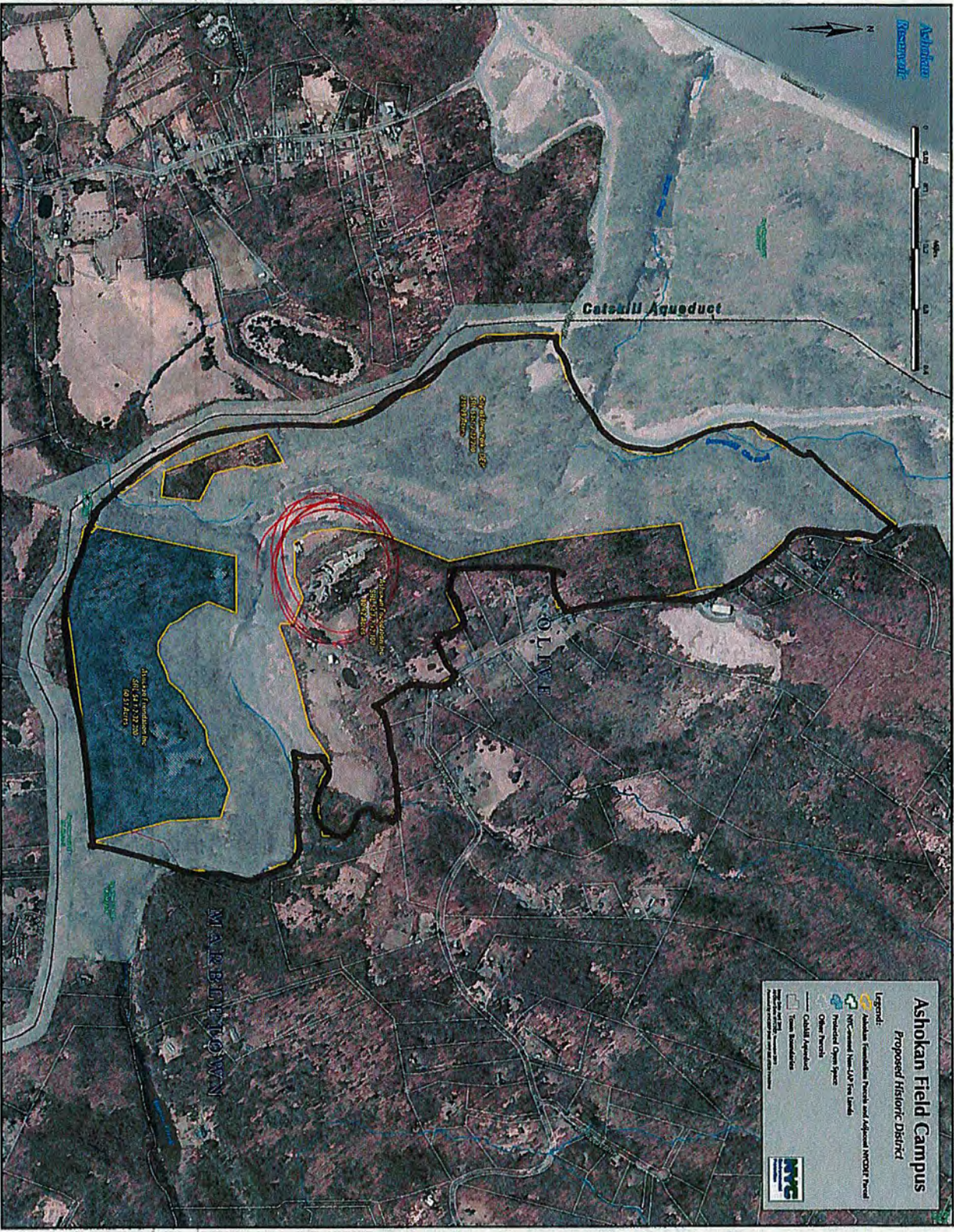


Ashokan Field Campus Historic District Photo Key



**EXHIBIT "C"**  
**DEP Aerial GIS Map**





Ashokan Reservoir



Catskill Aqueduct

Site of the Ashokan Reservoir

Site of the Ashokan Reservoir

OLIVE

MARBLETOWN

Division of Environmental Conservation  
609 West 12th Street  
Albany, NY 12242-1200

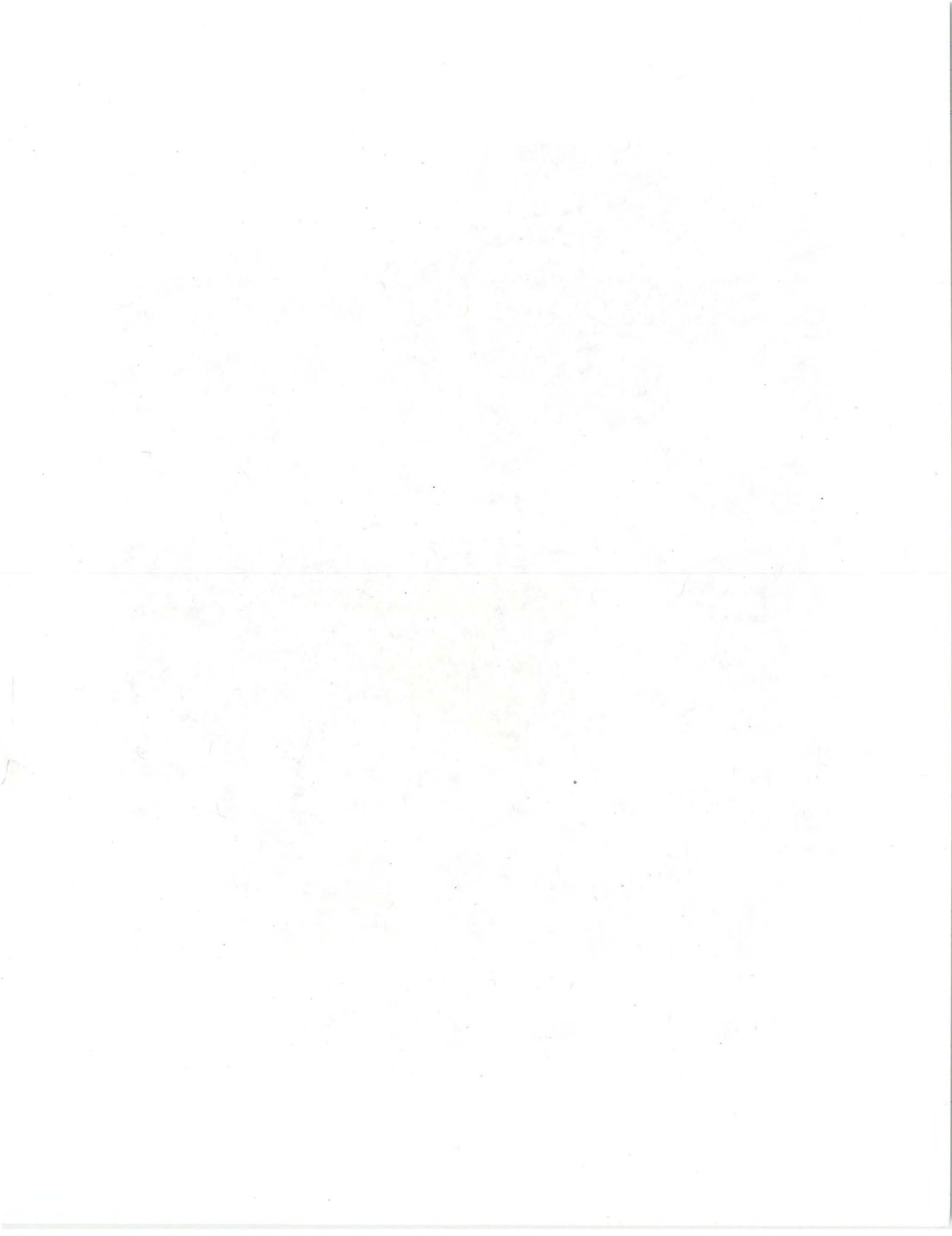
**Ashokan Field Campus  
Proposed Historic District**

**Legend:**

- Ashokan Foundation Permits and Approval (MCHRF) Permit
- Incorporated Non-UV Fee Lands
- Protected Open Space
- Other Permits
- Caddisfly Aqueduct
- Town Boundaries
- Ashokan Reservoir

**NYC**







**ACKNOWLEDGEMENT**

STATE OF NEW YORK

SS:

COUNTY OF Sullivan

On the 8<sup>th</sup> day of November in the year 2018 before me, the undersigned, personally appeared **PAUL V. RUSH**, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed same in his capacity, and that by his signature on the within instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

*Pamela Zanetti*

Notary Public

Printed Name: Pamela Zanetti

My Commission Expires:

8/31/22

**PAMELA ZANETTI**  
Notary Public, State of New York  
Residing in the County of Sullivan  
Commission Expires Aug. 31, ~~2018~~ 2022  
Reg. No. 01ZA4714481



**COMMENTS ON THE ASHOKAN FIELD CAMPUS HISTORIC DISTRICT  
NOMINATION APPLICATION TO  
THE STATE & NATIONAL REGISTERS OF HISTORIC PLACES**

**Background**

The City of New York ("City") and the NYC Department of Environmental Protection ("NYCDEP") (the City and NYCDEP shall hereinafter collectively be referred to as "DEP") in accordance with 9 NYCRR §427.4, jointly submit this written statement containing DEP's comments on the National Register of Historic Places Registration Application prepared by Larson Fisher Associates, Inc. ("Applicant") nominating the Ashokan Field Campus Historic District ("Proposed District") for concurrent listing in the New York State and National Registers of Historic Places ("Nomination Application"). The Proposed District is comprised of three parcels located in Ulster County, New York, two of which are owned by the Ashokan Field Institute, Inc. ("AFI Parcels"), and one of which is owned by DEP ("DEP Parcel"). As further explained in the Comments below, DEP believes the Proposed District is ineligible for listing in both the State and National Registers for the following reasons:

- I. The boundary of the Proposed District is too large and thus is improper for listing in both the National and State Registers as proposed;
- II. The integrity of a majority of the Proposed District's contributing resources have been compromised, and the Applicant has not properly discussed or demonstrated that these contributing resources individually and/or collectively qualify the Proposed District for any of the Criteria Considerations enumerated in 36 CFR §60.4;
- III. Due to the aforementioned contributing resource integrity issues, the historic significance of the Proposed District is compromised, thereby negating the Proposed District's eligibility for listing; and
- IV. The Nomination Application as submitted is incomplete, lacks a substantial amount of required discussion and information, and contains numerous inconsistencies, and therefore should be deemed incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time.

DEP respectfully requests that the New York State Board of Historic Preservation, the New York State Historic Preservation Officer, the National Parks Service and the Keeper of the National Register of Historic Places carefully consider these comments in conjunction with the Nomination Application, and respectively conclude that the Proposed District is ineligible for listing in the National and State Registers at this time.

**Comments**

DEP offers the following comments in support of its position that the Proposed District is ineligible for listing in the State and National Registers at this time:



**I. The boundary of the Proposed District is too large and thus is improper for listing in both the National and State Registers as proposed;**

**A. Governing Regulations & NPS Technical Guidance**

36 CFR §60.3 defines a "District" as "a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history."<sup>1</sup> The National Register Bulletin No. 15, *How to Apply the National Register Criteria for Evaluation* ("NRB 15") further contextualizes this definition by stating: "A district derives its importance from being a unified entity ... [it] must be a definable geographic area that can be distinguished from surrounding properties by changes such as density, scale, type, age, style of sites, buildings, structures, and objects, or by documented differences in patterns of historic development or associations. It is seldom defined, however, by the limits of current parcels of ownership, management or planning boundaries. The boundaries must be based upon a shared relationship among the properties constituting the district."<sup>2</sup>

Section 10 of the National Register Registration Application Form requires applicants to include a Boundary Justification statement that provides an explanation of the reasons for the applicant's selection of the proposed boundary for the nominated historic property or district.<sup>3</sup> National Register Bulletin No. 16A, titled *How to Complete the National Register Registration Form* ("NRB 16A"), further explains the required level of detail to be included in the justification statement, and specifically notes that "Properties with substantial acreage require more explanation than those confined to small city lots."<sup>4</sup> In addition, NRB 16A lists the following guidelines for applicants to review and consider while choosing an appropriate boundary line for a property or district:

**1. For All Properties:<sup>5</sup>**

- a. Carefully select boundaries to encompass, but not exceed the full extent of the significant resources and land area making up the property.

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<sup>1</sup> 36 CFR §60.3. *Note*, in the instant case, the Proposed District has been concurrently nominated for listing in both the State and National Registers. Pursuant to 9 NYCRR §427.1(a), in the event of a concurrent listing proposal, review for listing in the State register shall primarily be done in accordance with the National Register nomination review process: "(a) Except as provided for in subdivision (b) of this section, all proposals for the listing of properties on both the National Register and State Register shall be submitted, reviewed and acted upon in accordance with the regulations governing the *National Register* (emphasis added) ...". Unless specifically noted otherwise herein, all analyses discussed in this document will have been undertaken and performed through the lens of the applicable federal regulatory analysis mechanisms as required by 36 CFR Part 60, and also in compliance with 9 NYCRR §427.1.

<sup>2</sup> See, National Register Bulletin No. 15, *How to Apply the National Register Criteria for Evaluation*: <https://www.nps.gov/nr/publications/bulletins/nrb15/>, p. 5-6 (hereinafter "NRB 15").

<sup>3</sup> See, National Register Bulletin No. 16A, *How to Complete the National Register Registration Form*, <https://www.nps.gov/nr/publications/bulletins/nrb16a/>, p. 54-57, Appendix IV:I (hereinafter "NRB 16A").

<sup>4</sup> *Id.* at 55

<sup>5</sup> *Id.* at 56



- b. The area to be registered should be large enough to include all historic features of the property, but should not include "buffer zones" or acreage not directly contributing to the significance of the property.
  - c. Leave out peripheral areas of the property that no longer retain integrity, due to subdivisions, development or other changes.
2. Specifically For Historic Districts:<sup>6</sup> Select boundaries to encompass the single area of land containing the significant concentration of buildings, sites, structures, or objects making up the district. The district's significance and historic integrity should help determine the boundaries. Consider the following factors:
- a. Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character.
  - b. Visual changes in the character of the area due to different architectural styles, types or periods, or to a decline in the concentration of contributing resources.
  - c. Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch.
  - d. Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.

#### **B. Analysis & Application to Proposed District**

The Proposed District in this instance spans 359.82 acres, and the boundary is explained by the Applicant in the Boundary Justification portion of the Nomination Application's Section 10 as follows: "The boundary was drawn to encompass the tract assembled by the New York State Teachers College at New Paltz for the Ashokan Field Campus in 1957."<sup>7</sup>

Immediately following Section 10 are four aerial maps of the Proposed District, which have been collectively attached hereto as Exhibit "A" for your review in conjunction herewith. The first three maps depict the outer boundary points of the Proposed District as viewed from various heights and scales, all of which are clearly measurable and discernable using the informational keys provided at the bottom of each of the respective maps.<sup>8</sup> The fourth map/site plan, titled, "Ashokan Field Campus Historic District Site Plan" ("Site Plan"), is an unscaled aerial photograph showing a small fraction of the acreage comprising the Proposed District. The exact amount of acres and scale of this Site Plan is unascertainable given the information provided by

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<sup>6</sup> *Id.* at 56-57

<sup>7</sup> Nomination Application p. 29.

<sup>8</sup> DEP understands and acknowledges that these three maps were included in the Applicant's Nomination Application to fulfill the Verbal Boundary Description requirements of Section 10.



the Applicant. However, DEP staff familiar with the property confirmed upon review that the Site Plan did in fact depict a small, concentrated area within the Proposed District boundary that is home to a large majority of the Nomination Application's listed complying and non-complying structures, sites and buildings ("Site Plan Area").<sup>9</sup> In addition, the Applicant also included a fifth aerial map/photograph, titled "Ashokan Field Campus Historic District Photo Key" on page 38 of the Nomination Application, which is attached hereto as Exhibit "B" and attempts to numerically depict the approximate locations of all of the contributing and non-contributing resources found throughout the Proposed District.<sup>10</sup> As was the case with the preceding Site Plan, this fifth aerial image also fails to disclose the amount of acreage shown in the photo or the scale/height at which the image was taken. In addition it fails to show the greater boundary line of the Proposed District in relation to the concentration of contributing and noncontributing resources labeled numerically thereon.

In an effort to better understand the boundary of the Proposed District in conjunction with the location of the concentration of contributing and noncontributing resources discussed in the Nomination Application, DEP composed an aerial map of the Proposed District using its in-house Geographic Information Systems technology. This map, which is attached hereto as Exhibit "C", shows, among other things, the total boundary lines of the 359.82-acre Proposed District, as well as the general location of the Site Plan Area referenced above.<sup>11</sup> A plain review of this map supports the conclusion that the boundary of the Proposed District far exceeds the concentrated Site Plan Area. In addition, when this map is viewed alongside the Applicant's fifth aerial image attached hereto as Exhibit "B", DEP's position that the contributing and noncontributing resources are concentrated in a specific, smaller area of the Proposed District, is only further reinforced.

As aforementioned in the Governing Regulations & NPS Technical Guidance Section above, a District is "a geographically definable area ... possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development."<sup>12</sup> DEP acknowledges that a *portion* of the Proposed District may be a geographically definable area possessing a significant concentration of sites, buildings, structures, or objects; however notwithstanding, DEP contests the overall boundary of the Proposed District as labeled and justified in Section 10 for the following reasons:

1. The Proposed District's boundary and the encompassing 359.82-acre geographic area is too expansive and as such, is not distinguishable from surrounding properties by changes such as density, scale, type, age, style of

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<sup>9</sup> *Id.* at 33.

<sup>10</sup> *Id.* at 38. *Note*, DEP takes issue with the overall accuracy and numerical formatting used in this map, which it discusses at greater length in Section IV of these Comments.

<sup>11</sup> Due to the lack of information provided in support of the Site Plan, the exact range and acreage of the Site Plan Area could not be depicted on DEP's attached map. Instead, DEP has circled the general Site Map Area in red on its map for your reference and review.

<sup>12</sup> 36 CFR §60.3



sites, buildings, structures, and objects.<sup>13</sup> In fact, the opposite is true. A large portion of the Proposed District is vacant and contains no evidence of historical remnants. Instead these areas are likely nothing more than densely forested woods that house no contributing or noncontributing sites, buildings, structures or objects. As the Applicant noted itself on page 3 of the Nomination Application, "most of the property is second growth forest."

2. The Applicant's boundary justification fails to sufficiently explain the extensive 359.82-acre boundary line of the Proposed District as encouraged by NRB 16A.<sup>14</sup> There are substantial portions of the Proposed District that are indistinguishable with no evidence of significance, and as such, arguably amount to nothing more than improper acreage buffer zones. Without further explanation from the Applicant in the Boundary Justification as to why these additional vacant acres should be included in the Proposed District, the Boundary Justification is insufficient.
3. The forested, indistinguishable areas of the Proposed District lack integrity, stemming from the 2008 tract sale and subsequent subdivision into three parcels whereby DEP acquired ownership of the central parcel for purposes of operation of the NYC Water Supply System, and the Ashokan Field Institute, Inc. acquired the remaining two buffering parcels.

### **Section I Conclusion**

For the reasons set forth above, DEP believes that the boundary of the Proposed District is excessive and as such cannot be included in the National and State Registers at this time.

- II. **The integrity of a majority of the Proposed District's contributing resources have been compromised, and the Applicant has not properly discussed or demonstrated that these contributing resources individually and/or collectively qualify the Proposed District for any of the Criteria Considerations enumerated in 36 CFR §60.4;**

#### **A. Governing Regulations & NPS Technical Guidance**

The "Criteria Considerations" section of 36 CFR §60.4 lists certain types of properties that ordinarily, due to their nature, will not be considered or deemed eligible for listing. Properties on this list include, but are not limited to:

- i. Structures that have been moved from their original locations,
- ii. Reconstructed historic buildings, and/or
- iii. Properties primarily commemorative in nature.<sup>15</sup>

<sup>13</sup> See NRB 15 p. 5-6.

<sup>14</sup> NRB 16A at 55

<sup>15</sup> See 36 CFR §60.4



However, 36 CFR §60.4 goes on to list limited, "special circumstances" also known as "criteria considerations", which operate to requalify these ordinarily ineligible properties for listing despite their disqualifying properties:

"such properties will qualify if they are integral parts of districts that do meet the criteria of [sic]<sup>16</sup> if they fall within the following categories:

- a. ...
- b. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- c. ...
- d. ...
- e. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- f. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance ...."<sup>17</sup>

NRB 15 further clarifies that "the Criteria Considerations need to be applied only to *individual* properties. Components of eligible districts do not have to meet the special requirements unless they make up the majority of the district or are the focal point of the district."<sup>18</sup>

NRB 16A instructs applicants to complete the Criteria Considerations portion of Section 8 of the National Register Registration Application as follows:

"Mark an 'x' in the box for any criteria consideration applying to the property. Mark all that apply. Leave this section blank if no considerations apply ... For **districts**, mark only the criteria considerations applying to the entire district or to a predominant resource or group of resources within the district."<sup>19</sup>

#### **B. Analysis & Application to Proposed District**

The Applicant included a narrative description of each contributing and noncontributing resource comprising the Proposed District in Section 5 of its Nomination

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<sup>16</sup> Note, this seems to be a drafting error that is contained in the most current version of regulation. Based on additional analysis of NRB 15 p. 25, DEP believes the word "of" as used here, should instead be replaced with the word "or". In the event this interpretation is improper, DEP requests further interpretative guidance from the SHPO and/or the National Parks Service.

<sup>17</sup> *Id.* Note, DEP has only listed the portions of the regulatory exemptions herein that it believes could possibly apply to the Proposed District.

<sup>18</sup> NRB 15 at 25

<sup>19</sup> NRB 16A at 36



Application. However, upon review of applicable federal regulations and NPS technical guidance bulletins, DEP submits that a large number of the Proposed District's purported contributing resources do not qualify as such because their historic integrity has been compromised due to movement, reconstruction, and/or the nature of the property as primarily commemorative in nature.<sup>20</sup>

DEP hereby comments on the following contributing resources in the Proposed District and questions them for their historic integrity and/or significance:

1. **Winchell Moehring House** – this building has been substantially reconstructed and repurposed since it was first built in the 18<sup>th</sup> century. Most recently, in 2015, a metal roof was added to the building, which brings the building's historic integrity into question. In addition, although the building has been in continuous use since the 18<sup>th</sup> century, the types of uses and functional purposes of the structure have varied substantially over time and most of the uses do not directly relate to the operation of the Ashokan Field Campus.
2. **Moehring Barn** – this building has been reconstructed in the last 5 years. According to the description, in 2015, a metal roof was added, and later in 2017, solar panels were installed. Further, this building's uses have varied greatly over time.
3. **Wagon Shed** – a review of the attached photo of this structure indicates that it was possibly reconstructed through the addition of a metal roof and solar panels; however, it is worth noting that this work was not detailed in the description section of the Nomination Application.<sup>21</sup>
4. **Granary** – DEP questions when the concrete elevation of this building occurred as noted in Section 5. Based on the description provided, it is not evident whether the elevation was undertaken at the time the building was erected, or instead at some later date. Further, the description states that the building “was built ... following traditional models to develop a farmyard with buildings *typical of the 19<sup>th</sup> century period*” (emphasis added), which DEP believes, without additional detailed information, is indicative of a structure that is primarily commemorative in nature.
5. **Smokehouse** – the description states that the building “was built ... following *traditional models* to develop a homestead with buildings *typical of the 19<sup>th</sup> century period*” (emphasis added), which DEP believes, without additional detailed information, is indicative of a structure that is primarily commemorative in nature.

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<sup>20</sup> See generally 36 CFR §60.4 *Criteria Considerations (b),(e),(f)*

<sup>21</sup> Note, DEP had some issues identifying each structure based on the attached photos because the photos were not labeled.



6. **Winchell's Falls & Hudson River Pulp & Paper Mfg. Co. Dam and Mill Site** – DEP questions the historic integrity and significance of this resource as a contributing property. Based on the scant information provided in the Section 5 description, it is very unclear how this site, and its historical context, contribute and connect to the Proposed District.
7. **Ashokan – Turnwood Covered Bridge** – this site is presently on the National Register of Historic Places and as such is not counted towards the total count of contributing resources within the Proposed District. It is worth noting that this bridge was substantially reconstructed in 2016 under the direction and supervision of the Ashokan Center. DEP was not involved in the reconstruction project and is unaware of how the work could have or did impact the bridge's National Register listing status.
8. **Print Shop** – as noted in the Section 5 description, this structure was originally built for a law office in Tillson, New York (near New Paltz) and was subsequently moved to its current location by camp staff in 1970. DEP questions this structure's historic integrity as a structure moved from its original location, and as a potentially reconstructed historic building.
9. **Old Foundation, 19th century** – DEP questions the historic integrity and significance of this property as it relates to the historical context and operations of this Ashokan Field Campus Historic District. The description states: "cellar hole for an unknown building with stone walls on four sides believed to be associated with Lemuel Winchell. *The site has been partially disturbed by amateur excavations by campers over the years, but may retain some archaeological potential.*" This site description is vague and raises questions as to how this site qualifies as a contributing source. In addition, in light of the campers' amateur excavation activities, it is arguable that the site's historic integrity has been compromised.
10. **Picnic Pavilion** – the description provided for this structure is extremely vague and it is unclear how this structure contributes to the Proposed District's historic significance.
11. **Sauna** – the description provided for this structure is extremely vague and it is unclear how this structure contributes to the Proposed District's historic significance.
12. **Campsite** – the description provided for this structure is extremely vague and it is unclear how this structure contributes to the Proposed District's historic significance.

As noted in the Governing Regulations & NPS Technical Guidance portion of this Section, generally individual components of eligible districts do not have to be evaluated individually for their integrity and thereafter be found to individually meet the Criteria



Considerations special requirements. However, individual components of districts *will be* evaluated in this way when properties with compromised integrity and any applicable qualifying criteria components, make up the *majority* of the district or are the focal point of the district.<sup>22</sup> In such a case, the relevant criteria considerations potentially applicable the district and/or the district's majority resource group/properties should be acknowledged as such in Section 8, and the applicability should thereafter be discussed by the applicant.

In the instant case, DEP believes that a majority of the contributing properties that comprise the Proposed District have compromised integrity for one or more of the reasons discussed above. In light of this majority integrity issue, DEP questions the overall integrity of the Proposed District, and posits that the Applicant should have completed the Criteria Considerations portion of Section 8 of the Nomination Application in order to appropriately address these integrity issues. Failure of the Applicant to do so amounts to a serious substantive flaw in the Applicant's Nomination Application. Alternatively, the Applicant could have argued that one or more Criteria Considerations applied to the District as a whole; however, this was not done either. No portion of the Criteria Considerations were addressed by the Applicant in Section 8 of the Nomination Application.

#### **Section II Conclusions:**

DEP questions the integrity of a majority of the Proposed District's contributing resources and hereby requests that the Applicant either reevaluate the Nomination Application and revise it accordingly to address the above mentioned integrity issues via Criteria Considerations, or alternatively, requests that the State Board and SHPO deny the Proposed District for listing in the National and State Registers at this time because a majority of the Proposed District's contributing resources as described in the Nomination Application have been shown to have compromised integrity without applicable Criteria Considerations.

**III. Due to the aforementioned contributing resource integrity issues, the historic significance of the Proposed District is compromised, thereby negating the Proposed District's eligibility for listing; and**

#### **A. Governing Regulations & NPS Technical Guidance**

The portion of 36 CFR §60.4 titled "Criteria for Evaluation" states:

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*"The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:*

**A. That are associated with events that have made a significant contribution to the broad patterns of our history; or**

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<sup>22</sup> NRB 15 at 25



- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.”<sup>23</sup> (emphasis added)

NRB 15 further guides applicants and regulatory reviewers regarding the proper application of the Criteria for Evaluation to properties and districts:

“For a property to qualify for the National Register it must meet one of the National Register Criteria for evaluation by:

- Being associated with an important historic context, *and*
- Retaining historic integrity of those features necessary to convey its significance.”<sup>24</sup>

In regards to historic significance and integrity of districts and the properties that make up those districts, NRB 15 states:

“A district must be *significant* as well as being an identifiable entity. ... *the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.* A district can contain buildings, structures, sites, objects, or open spaces that do not contribute to the significance of the district. *The number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district's integrity*”<sup>25</sup> (emphasis added).

## **B. Analysis & Application to Proposed District**

As discussed in Section II above, DEP questions the integrity of approximately 12 of 17 of the Proposed District's contributing resources<sup>26</sup>. In light of the Applicant's failure to address these majority contributing resource integrity issues via discussion and appropriate marking of the Criteria Considerations portion of Section 8 of the Nomination Application, DEP does not think the remaining uncompromised contributing resources individually, or collectively as part of the Proposed District, retain enough historic significance under Criteria A or C as listed in 36 CFR §60.4.

<sup>23</sup> See 36 CFR §60.4

<sup>24</sup> NRB 15 at 3

<sup>25</sup> *Id.* at 5

<sup>26</sup> Note, the reference to 17 contributing resources is derived from page 2, Section 5 of the Nomination Application. However, DEP is unsure of the total number of contributing resources proposed by the Applicant in the application because the total number (17) listed in Section 5, does not fully match up with the total number of contributing properties listed later in Section 7.



As NRB 15 states, "*the number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district's integrity*"<sup>27</sup> The Applicant's failure to rehabilitate the compromised integrity of the 12 contributing resources listed in Section II significantly impacts the District's integrity as a whole. Once the 12 resources are removed as contributing resources and reallocated as noncontributing, the Proposed District overall is left with just a total of 5 contributing resources, and 26 noncontributing resources (12 of which have integrity issues) which are all concentrated in one relatively distinct section of the 359.82-acre Proposed District. The only logical conclusion that can result is that the District's overall integrity has been severely compromised, which in turn prevents the District from effectively conveying its sense of time, place, and historical development. As a result, the Proposed District is not historically significant and does not meet Criteria for Evaluation (a) and (c) as stated in the Nomination Application.

In addition, separate and apart from the integrity issue, is the fact that Period of Significance described by the Applicant in Section 8 (spanning 1785 – 1970) does not logically reflect or appropriately relate in any way to the boundary line justification in Section 10.<sup>28</sup> The applicant states the following as the justification for the chosen period of significance:

"The Period of Significance was drawn to encompass the varied and evolving history of the property. It begins with Lemuel Winchell's ca. 1785 house, which may be located on earlier foundations, and extends until ca. 1970, when the majority of the buildings associated with the Ashokan Field Campus, a college-based outdoor education program, had been completed. The property has continued to function as a camp focused on the ecological and cultural history of the Catskills region to the present day."<sup>29</sup>

DEP fails to see how the boundary line is justified or significant when compared against the Applicant's period of significance statement. This analysis only further supports DEP's position that the Proposed District is ineligible for listing at this time because the Applicant has failed to prove its significance, and has also failed to demonstrate that it is an identifiable entity based on its boundary lines and the resources contained therein.

### **Section III Conclusions**

For the above-listed reasons, the resource integrity issues discussed in Section II, and the improper boundary justification discussed in Sections I and III hereof, collectively detrimentally impact the Proposed District's historic significance to such an extent that the District does not qualify for listing under Criteria for Eligibility (A) and (C) (36 CFR §60.4).

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<sup>27</sup> NRB 15 at 5

<sup>28</sup> See generally Nomination Application page 29, stating: "the boundary was drawn to encompass the tract assembles by the New York State Teachers College at New Paltz for the Ashokan Field Campus in 1957."

<sup>29</sup> *Id.* at 12.



**IV. The Nomination Application as submitted is incomplete, lacks a substantial amount of required discussion and information, and contains numerous inconsistencies and errors, and therefore should be deemed incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time.**

**A. Governing Regulations & NPS Technical Guidance**

60 CFR §60.6(k) states:

(k) Nominations approved by the State Review Board and comments received are then reviewed by the State Historic Preservation Officer and if he or she finds the nominations to be *adequately documented and technically, professionally, and procedurally correct and sufficient and in conformance with National Register criteria for evaluation*, the nominations are submitted to the Keeper of the National Register of Historic Places, National Park Service, United States Department of the Interior, Washington, D.C. 20240. All comments received by a State and notarized statements of objection to listing are submitted with a nomination<sup>30</sup> (emphasis added)

Additional review guidance is provided in the National Park Service's "Technical Review Checklist" and "Substantive Checklist"<sup>31</sup> which respectively highlight the various potential consistency, technical and substantive issues commonly identified by the reviewers.

**B. Analysis & Application to Proposed District**

A cursory review of the Nomination Application using the National Park Service's "Technical Review Checklist" and "Substantive Checklist" as a guide reveal the following consistency, technical and substantive issues within the Nomination Application. DEP encourages the State Board, SHPO and Keeper to review the Nomination Application with the below spotted issues in mind, and conclude that the Nomination Application as submitted in its current form is incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time

- The total number of contributing and noncontributing resources listed in Sections 5 and 7 are inconsistent.
- The Chart contained on pages 5/6 of the application contains several formatting errors that combine contributing and noncontributing resources into one line item.
- Labeling of Photos and Figures. The photos are referenced by number in the description portions of the Nomination Application, but then are not numbered as appended. Figures are numbered as appended, however some of the Figures are also photos, which resulted in substantial confusion during review.
- The map on page 38 titled "Ashokan Field Campus Historic District Photo Key"—references photos "40, 41, 42"—these are not photos appended or referenced anywhere in the application. They specifically do not correspond with any

<sup>30</sup> 36 CFR §60.6

<sup>31</sup> See *National Review Checklists* available for download at <https://www.nps.gov/nr/publications/forms.htm>



contributing/noncontributing items listed in Section 7, pages 5/6 as the rest of the numbers in the map do.

- Section 7, Resource No. 29 Campsite – is noted as “2 buildings”, but it is unclear whether these two buildings are counted as distinct contributing resources or one single resource.
- Descriptions of the resources in Section 7 are inconsistent in length and detail, and in many places unclear and seemingly incomplete – particularly with respect to the listed items that are labeled contributing resources. The descriptions for these resources becomes more inadequate as the list progresses.
- Alterations that occurred to the listed resources have not been adequately described in the application, or at times even mentioned at all.
- DEP is named at the “Department of Environmental Education” within Application (see page 3 Summary Paragraph).
- Properties have been altered and the differences between the original and current conditions/appearances is not clearly established or described in accordance with the applicable federal regulations.
- Section 3 of the Application is partially completed and should be completely left blank and filled in by State and National Register review agencies.

### **General Conclusion**

DEP, as an interested property owner whose land falls within the Proposed District, hereby submits these Nomination Application comments for review and consideration by New York State Board of Historic Preservation, the New York State Historic Preservation Officer, the National Park Service and the Keeper of the National Register of Historic Places, as applicable, for their respective use and consideration while reviewing Applicant’s Nomination Application and determining the eligibility of the Proposed District for listing in the National and/or State Registers. Based on the reasons set forth above, DEP does not believe the Proposed District is eligible for listing at this time in either the State or the National Register. Should any of the reviewing person(s) or agencies wish to discuss or clarify DEP’s position(s), you may contact:

Casey McCormack,  
Assistant Counsel,  
DEP Bureau of Legal Affairs  
(718) 595 6503



**EXHIBIT "A"**  
**Boundary Maps & Site Plan**

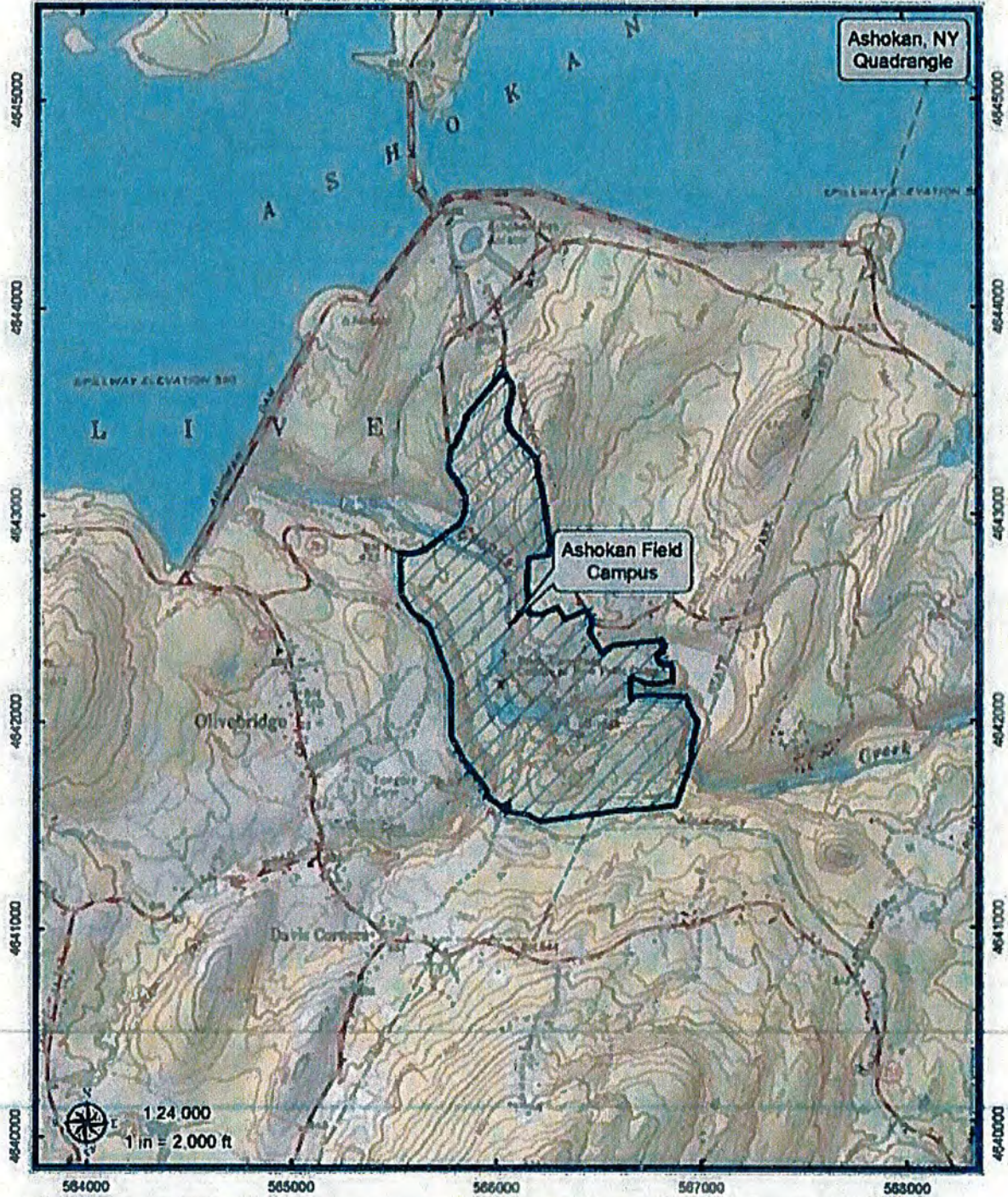


**Ashokan Field Campus Historic District** **DRAFT**  
Name of Property

**Ulster, New York**  
County and State

**Ashokan Field Campus**  
Olive Bridge, Ulster Co., NY

**477 Beaverkill Road**  
Olive Bridge, NY 12461



Coordinate System: NAD 1983 UTM Zone 18N  
Projection: Transverse Mercator  
Datum: North American 1983  
Units: Meter

0 650 1,300 2,600 Feet

 Ashokan Field Campus



Parks, Recreation  
and Historic Preservation  
Division for Historic Preservation

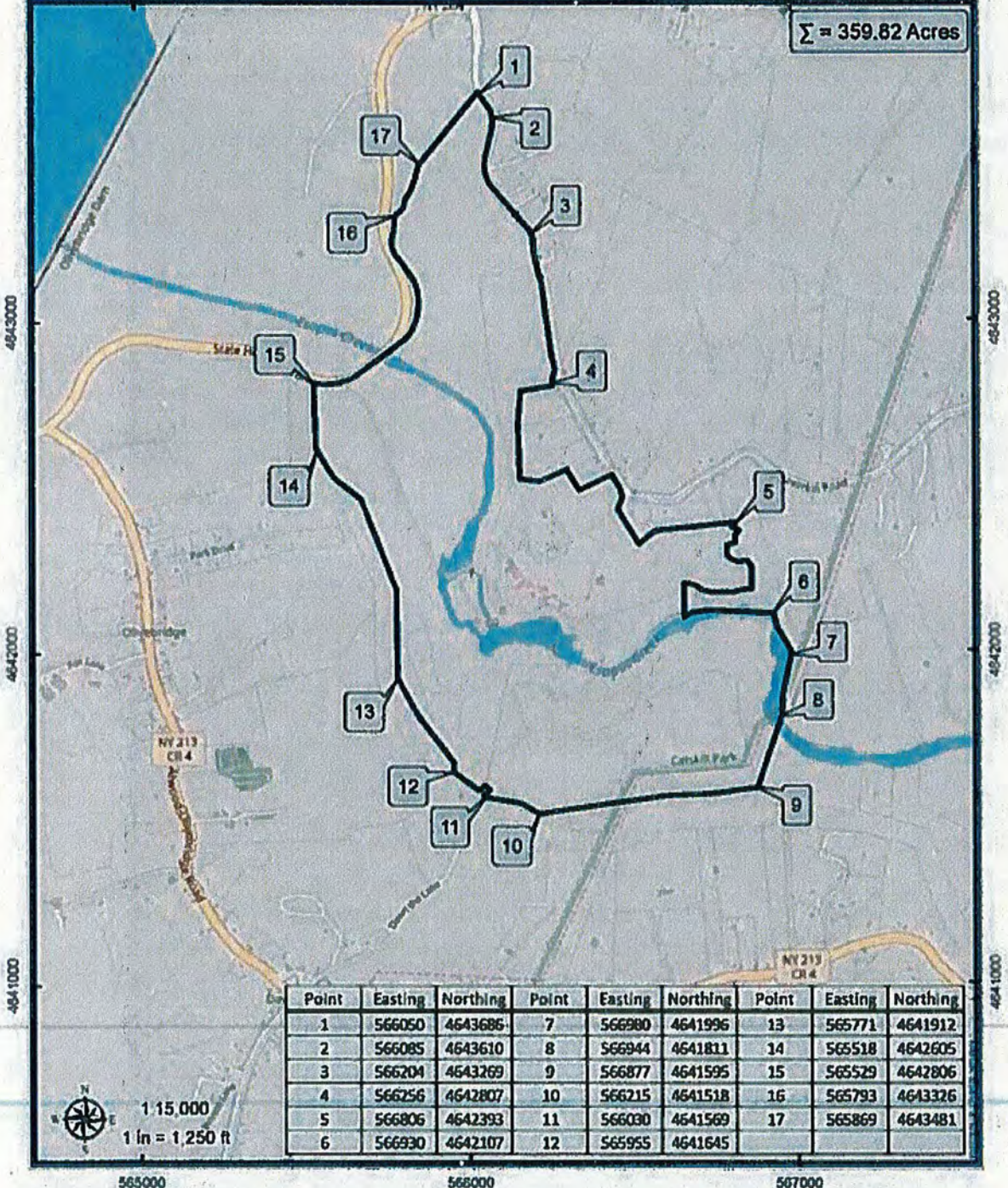


Ashokan Field Campus Historic District **DRAFT**  
 Name of Property

Ulster, New York  
 County and State

Ashokan Field Campus  
 Olive Bridge, Ulster Co., NY

477 Beaverkill Road  
 Olive Bridge, NY 12461



Point	Easting	Northing	Point	Easting	Northing	Point	Easting	Northing
1	566050	4643685	7	566980	4641996	13	565771	4641912
2	566085	4643610	8	566944	4641811	14	565518	4642605
3	566204	4643269	9	566877	4641595	15	565529	4642806
4	566256	4642807	10	566215	4641518	16	565793	4643326
5	566806	4642393	11	566030	4641569	17	565869	4643481
6	566930	4642107	12	565955	4641645			

Coordinate System: NAD 1983 UTM Zone 18N  
 Projection: Transverse Mercator  
 Datum: North American 1983  
 Units: Meter



NEW YORK Parks, Recreation and Historic Preservation  
 Division for Historic Preservation

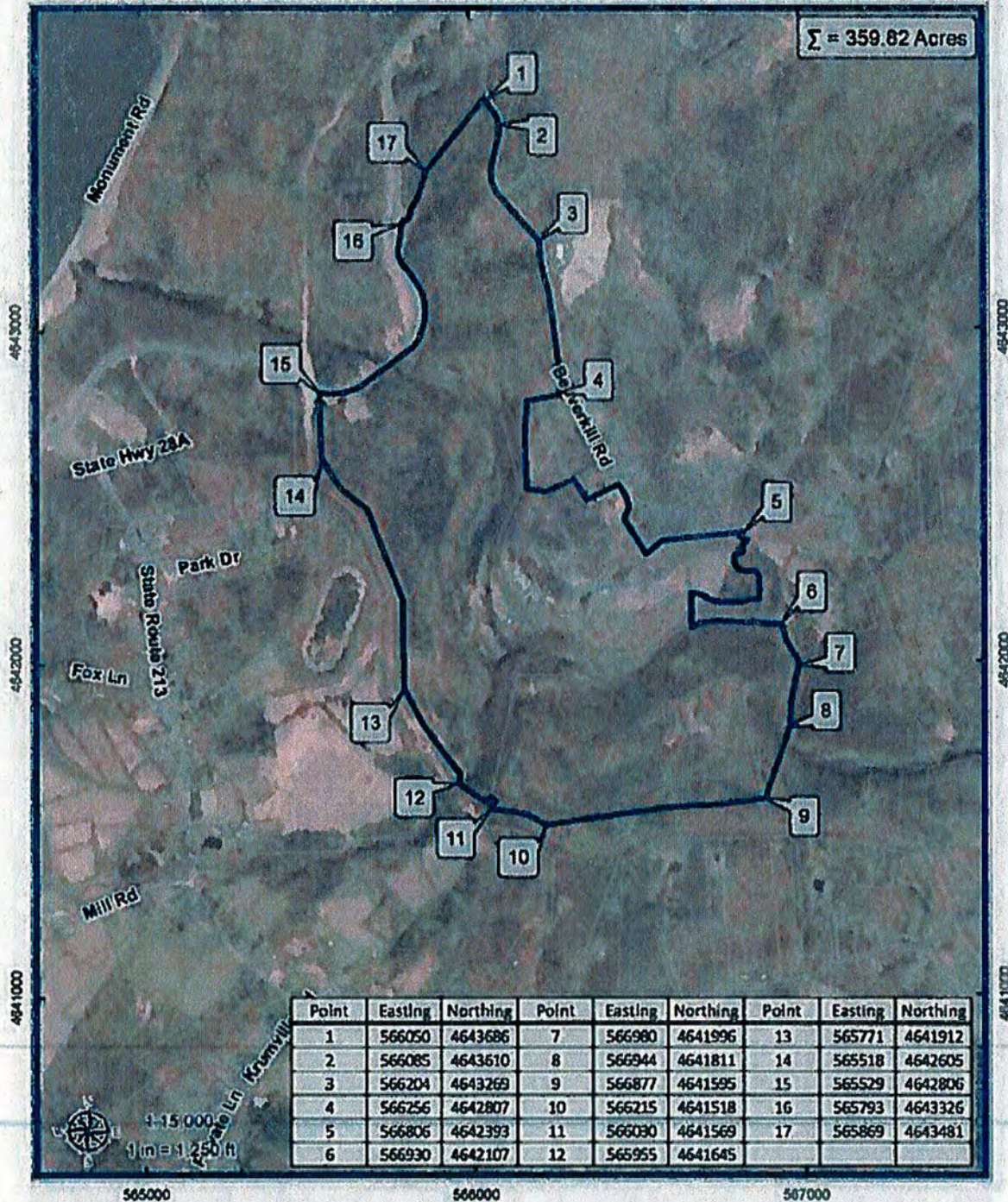


Ashokan Field Campus Historic District **DRAFT**  
 Name of Property

Ulster, New York  
 County and State

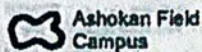
Ashokan Field Campus  
 Olive Bridge, Ulster Co., NY

477 Beaverkill Road  
 Olive Bridge, NY 12461



Coordinate System: NAD 1983 UTM Zone 18N  
 Projection: Transverse Mercator  
 Datum: North American 1983  
 Units: Meter

0 405 810 1,620 Feet









**EXHIBIT "B"**  
**"Ashokan Field Campus Historic District Photo Key"**



**Ashokan Field Campus Historic District** **DRAFT**  
Name of Property

**Ulster, New York**  
County and State



Ashokan Field Campus Historic District Photo Key

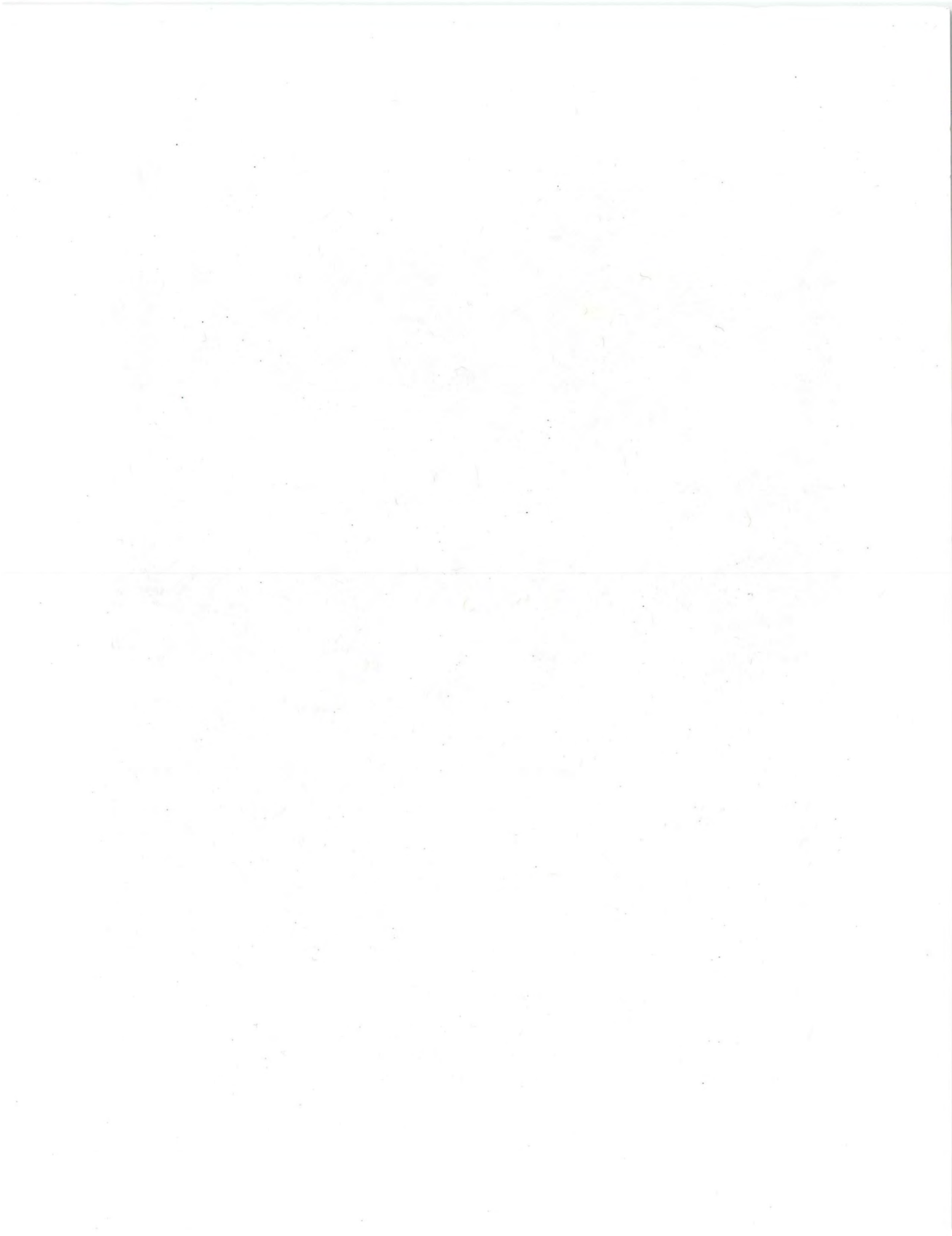


**EXHIBIT "C"**  
**DEP Aerial GIS Map**





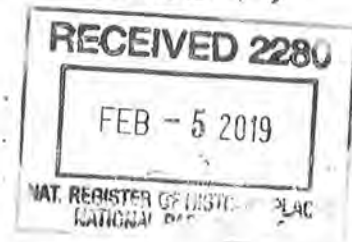








January 22, 2019



**Vincent Sapienza, P.E.**  
Commissioner

Joy Beasley  
Keeper of the National Register  
Associate Director of Cultural Resources  
Department of the Interior - National Park Service  
1849 C Street, NW – Mail Stop 7228  
Washington, DC 20240

**Paul V. Rush, P.E.**  
Deputy Commissioner  
Bureau of Water Supply  
prush@dep.nyc.gov

Julie H. Ernstein, Ph.D., RPA  
Acting Chief, National Register & National Historic Landmarks Program  
Deputy Keeper of the National Register  
Department of the Interior - National Park Service  
1849 C Street, NW – Mail Stop 7228  
Washington, DC 20240

P.O. Box 358  
Grahamsville, NY 12740  
T: (845) 340-7800  
F: (845) 334-7175

Re: The Ashokan Field Campus Historic District National Register Nomination

Dear Ms. Beasley and Ms. Ernstein:

The New York City Department of Environmental Protection (DEP) submits this comment letter in regards to the New York State Historic Preservation Officer's (SHPO) nomination of The Ashokan Field Campus Historic District's (District) for listing in the National Register of Historic Places. As the agency responsible for delivering high quality and plentiful water to half the population of New York State, DEP respectfully requests that in the Department of the Interior's (DOI) review of this nomination, it consider the vital role of DEP's infrastructure located within the bounds of the District. DEP is mindful of the need to preserve historical resources, while ensuring it has the required flexibility to utilize its assets that fall within the District.

New York City's water supply system, which is one of the oldest, largest and most complex surface water supplies in the world, is comprised of three separate reservoir systems: the Croton, the Catskill and the Delaware. DEP, as the operator of the system, provides an average of 1.1 billion gallons of water to nine million New York City residents and visitors in addition to one million residents living north of the City in Orange, Putnam, Ulster, and Westchester counties.

The District falls within the Catskill water supply system and encompasses property and critical water supply assets owned by New York City. In particular, the Ashokan Release Channel (ARC) runs through two DEP-owned parcels that comprise a portion of the District. As explained below, ARC is an important asset in enabling DEP to operate the Catskill system as an unfiltered supply, in compliance with the federal Safe Drinking Water Act and Surface Water Treatment Rule (SWTR), and it is imperative that DEP has the continued flexibility to operate and adjust ARC as needed to ensure the water supply system remains in compliance with these laws.

ARC is a concrete canal, constructed in the early 1900s, that is used to convey water from the Ashokan Reservoir—currently up to 600 million gallons per day—in a controlled manner from the reservoir through the upper and lower gate chambers to the Old Esopus Creek. DEP's strategic use of ARC enables it to address water quality concerns that can arise during, and following, intense storm events. In addition, ARC can be used proactively to benefit the surrounding communities by enabling DEP to create a void in the Ashokan Reservoir upstream of ARC, thus making room in the Ashokan Reservoir to capture additional flows before a large storm event or when seasonal runoff is expected to be high. For these reasons, DEP's continued use of ARC assists DEP in ensuring the delivery of high quality water during such events, as well as complying with the stringent federal and state requirements to maintain an unfiltered supply.

DEP and the City of New York have a deep appreciation for the preservation of historically significant properties. That said, DEP also has concerns about the inclusion of the City's property as part of the District. See attached letter of objection and comments articulating these concerns, which DEP submitted to SHPO on November 8, 2018 (SHPO Comments). DEP requests that DOI and the Keeper be mindful of these concerns in reviewing the District's nomination. In the event DOI and the Keeper determine that the District is eligible and/or approved for listing, DEP urges DOI and the Keeper to consider revising and limiting the boundary line of the District before making such determination, as suggested by DEP in the SHPO Comments. Alternatively, in the event DOI and the Keeper determine the District to be eligible and/or confirmed for listing with the boundary line as-is, then DEP requests that DOI and the Keeper recognize, in making this determination, the critical role of ARC and the City's need for flexibility in its future use, despite its location within the District.

Thank you for your time and consideration in this matter.

Sincerely,



Paul V. Rush, P.E.  
Deputy Commissioner



- c: Rose Harvey, State Historic Preservation Officer
- Daniel Mackay, Deputy State Historic Preservation Officer
- David Warne, DEP Assistant Commissioner, Bureau of Water Supply
- Robin Levine, DEP, Bureau of Legal Affairs
- Casey McCormack, DEP, Bureau of Legal Affairs
- Daniel Mulvihill, DEP, Bureau of Legal Affairs

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**Attachment**

SHPO Comments - November 8, 2018

The Commission, having reviewed the proposed project and the information provided by the applicant, has concluded that the project is in compliance with the provisions of the State Historic Preservation Act (SHPA) and the National Historic Preservation Act (NHPA). The Commission has determined that the project is not a historic resource and therefore does not require a Section 106 review. The Commission's decision is based on the following findings:

1. The project is located in an area that is not designated as a historic district or landmark.

2. The project is not a building, structure, or object that is listed in the National Register of Historic Places.

3. The project is not a building, structure, or object that is eligible for listing in the National Register of Historic Places.

4. The project is not a building, structure, or object that is significant in the history, architecture, or culture of the State or the Nation.

5. The project is not a building, structure, or object that is significant in the history, architecture, or culture of the State or the Nation.

6. The project is not a building, structure, or object that is significant in the history, architecture, or culture of the State or the Nation.

7. The project is not a building, structure, or object that is significant in the history, architecture, or culture of the State or the Nation.

8. The project is not a building, structure, or object that is significant in the history, architecture, or culture of the State or the Nation.

9. The project is not a building, structure, or object that is significant in the history, architecture, or culture of the State or the Nation.

10. The project is not a building, structure, or object that is significant in the history, architecture, or culture of the State or the Nation.



**Vincent Sapienza, P.E.**  
*Commissioner*

**Paul V. Rush, P.E.**  
Deputy Commissioner  
Bureau of Water Supply  
prush@dep.nyc.gov

P.O. Box 358  
Grahamsville, NY 12740  
T: (845) 340-7800  
F: (845) 334-7175

November 8, 2018

**Commissioner Rose Harvey**  
New York State Historic Preservation Officer  
Commissioner of Parks, Recreation and Historic Preservation  
P.O. Box 189  
Waterford, NY 12188

**Deputy Commissioner R. Daniel Mackay**  
Deputy Commissioner for Historic Preservation  
Deputy State Historic Preservation Officer  
NYS Parks, Recreation and Historic Preservation  
P.O. Box 189  
Waterford, NY 12188

**Re: The Ashokan Field Campus Historic District**  
477 Beaverkill Road,  
Olive Bridge, NY 12461  
Ulster County

Dear Commissioner Harvey and Deputy Commissioner Mackay:

I am writing on behalf of the City of New York ("City") and the New York City Department of Environmental Protection ("DEP") who hereby object to and comment on the designation and listing of the "Ashokan Field Campus Historic District" ("Proposed District") in the National and New York State Registers of Historic Places in accordance with 36 CFR §60.6(g) and 9 NYCRR §427.4 respectively.

The Proposed District spans three parcels in Ulster County, New York, two of which are owned by the Ashokan Foundation, Inc. ("AFI Parcels"), one of which is owned by the City, by and through DEP ("DEP Parcel"). On August 21, 2018, DEP received a notice letter from Deputy Commissioner Mackay ("Notice Letter") that stated the Proposed District was being considered by the New York State Board of Historic Preservation for listing in the National and State Registers of Historic Places, and that the DEP Parcel was one of the properties comprising the Proposed District. DEP Assistant Commissioner Dave Warne subsequently requested a copy of the National Register of Historic Places Registration Form that was submitted to your office nominating the Proposed District for listing consideration ("Nomination Application"), for DEP's review and comment, which he received from your office via email on August 30, 2018. On September 10, 2018, DEP requested via letters and emails addressed to each of you that the State Board's consideration of the Proposed District be postponed in accordance with 9 NYCRR 427.4(d) to allow DEP additional time to review the Nomination Application and prepare comments thereto. Division Director Michael F. Lynch notified DEP via email on September 11, 2018 that Deputy



Commissioner Mackay had granted DEP's request for extension to November 9, 2018, to which he attached a signed letter from the Deputy Commissioner effectuating same ("Extension Letter").

Upon further review of the Nomination Application in conjunction with all applicable federal and state law, and supplemental technical guidance bulletins published by the National Parks Service, DEP, acting on behalf of the City as the sole fee simple owner of the DEP Parcel, hereby formally objects to the nomination and listing of the Proposed District in the National Register of Historic Places pursuant to 36 CFR §60.6(g), and in particular, to the inclusion of the DEP Parcel within the Proposed District's boundary line.


DEP submits the attached comments to the Nomination Application ("Comments") in accordance with 9 NYCRR §427.4, and consistent with the submission requirements noted in the Deputy Commissioner's Extension Letter dated September 11, 2018. As further detailed in the attached Comments, DEP contests the eligibility of the Proposed District for listing in both the State and National Registers of Historic Places for the following reasons:

- I. The boundary of the Proposed District is too large and thus is improper for listing in both the National and State Registers as proposed;
- II. The integrity of a majority of the Proposed District's contributing resources have been compromised, and the Applicant has not properly discussed or demonstrated that these contributing resources individually and/or collectively qualify the Proposed District for any of the Criteria Considerations enumerated in 36 CFR §60.4;
- III. Due to the aforementioned contributing resource integrity issues, the historic significance of the Proposed District is compromised, thereby negating the Proposed District's eligibility for listing; and
- IV. The Nomination Application as submitted is incomplete, lacks a substantial amount of required discussion and information, and contains numerous inconsistencies, and therefore should be deemed incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time.

DEP respectfully requests that the SHPO and the State Board carefully consider the attached Comments in conjunction with their review(s) of the Nomination Application, and collectively conclude that, based upon the current state of the Nomination Application, the Proposed District is ineligible for listing in the National and State Registers.

Please confirm your timely receipt of this letter and the enclosed Comments. Thank you for your time and consideration.

Sincerely,



Paul V. Rush, P.E.

Deputy Commissioner



- c: Michael Lynch, Division Director, NYS Division for Historic Preservation**
- David Warn, Assistant Commissioner, DEP Bureau of Water Supply**
- Casey McCormack, Assistant Counsel DEP Bureau of Legal Affairs**
- Daniel Mulvihill, Senior Environmental Counsel, DEP Bureau of Legal Affairs**
- Robin Levine, Senior Environmental Counsel, DEP Bureau of Legal Affairs**





November 8, 2018

**Vincent Sapienza, P.E.**  
Commissioner

**Paul V. Rush, P.E.**  
Deputy Commissioner  
Bureau of Water Supply  
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**Commissioner Rose Harvey**  
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- I. The boundary of the Proposed District is too large and thus is improper for listing in both the National and State Registers as proposed;
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- III. Due to the aforementioned contributing resource integrity issues, the historic significance of the Proposed District is compromised, thereby negating the Proposed District's eligibility for listing; and
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DEP respectfully requests that the SHPO and the State Board carefully consider the attached Comments in conjunction with their review(s) of the Nomination Application, and collectively conclude that, based upon the current state of the Nomination Application, the Proposed District is ineligible for listing in the National and State Registers.

Please confirm your timely receipt of this letter and the enclosed Comments. Thank you for your time and consideration.

Sincerely,



Paul V. Rush, P.E.  
Deputy Commissioner





- c: Michael Lynch, Division Director, NYS Division for Historic Preservation**
- David Warne, Assistant Commissioner, DEP Bureau of Water Supply**
- Casey McCormack, Assistant Counsel DEP Bureau of Legal Affairs**
- Daniel Mulvihill, Senior Environmental Counsel, DEP Bureau of Legal Affairs**
- Robin Levine, Senior Environmental Counsel, DEP Bureau of Legal Affairs**

ATTORNEYS & COUNSELORS  
AT-LAW  
100 WALL STREET  
NEW YORK, N.Y. 10038  
TEL: (212) 410-7000  
FAX: (212) 410-7001  
WWW: WWW.MITCHELLSILVERSTEIN.COM





**ACKNOWLEDGEMENT**

STATE OF NEW YORK

SS:

COUNTY OF Sullivan

On the 8<sup>th</sup> day of November in the year 2018 before me, the undersigned, personally appeared **PAUL V. RUSH**, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed same in his capacity, and that by his signature on the within instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

Pamela Zanetti

Notary Public

Printed Name: Pamela Zanetti

My Commission Expires:

8/31/22

**PAMELA ZANETTI**  
Notary Public, State of New York  
Residing in the County of Sullivan  
Commission Expires Aug. 31, ~~2018~~ 2022  
Reg. No. 01EA4714481





**COMMENTS ON THE ASHOKAN FIELD CAMPUS HISTORIC DISTRICT  
NOMINATION APPLICATION TO  
THE STATE & NATIONAL REGISTERS OF HISTORIC PLACES**

**Background**

The City of New York ("City") and the NYC Department of Environmental Protection ("NYCDEP") (the City and NYCDEP shall hereinafter collectively be referred to as "DEP") in accordance with 9 NYCRR §427.4, jointly submit this written statement containing DEP's comments on the National Register of Historic Places Registration Application prepared by Larson Fisher Associates, Inc. ("Applicant") nominating the Ashokan Field Campus Historic District ("Proposed District") for concurrent listing in the New York State and National Registers of Historic Places ("Nomination Application"). The Proposed District is comprised of three parcels located in Ulster County, New York, two of which are owned by the Ashokan Field Institute, Inc. ("AFI Parcels"), and one of which is owned by DEP ("DEP Parcel"). As further explained in the Comments below, DEP believes the Proposed District is ineligible for listing in both the State and National Registers for the following reasons:

- I. The boundary of the Proposed District is too large and thus is improper for listing in both the National and State Registers as proposed;
- II. The integrity of a majority of the Proposed District's contributing resources have been compromised, and the Applicant has not properly discussed or demonstrated that these contributing resources individually and/or collectively qualify the Proposed District for any of the Criteria Considerations enumerated in 36 CFR §60.4;
- III. Due to the aforementioned contributing resource integrity issues, the historic significance of the Proposed District is compromised, thereby negating the Proposed District's eligibility for listing; and
- IV. The Nomination Application as submitted is incomplete, lacks a substantial amount of required discussion and information, and contains numerous inconsistencies, and therefore should be deemed incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time.

DEP respectfully requests that the New York State Board of Historic Preservation, the New York State Historic Preservation Officer, the National Parks Service and the Keeper of the National Register of Historic Places carefully consider these comments in conjunction with the Nomination Application, and respectively conclude that the Proposed District is ineligible for listing in the National and State Registers at this time.

**Comments**

DEP offers the following comments in support of its position that the Proposed District is ineligible for listing in the State and National Registers at this time:





**I. The boundary of the Proposed District is too large and thus is improper for listing in both the National and State Registers as proposed;**

**A. Governing Regulations & NPS Technical Guidance**

36 CFR §60.3 defines a “District” as “a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history.”<sup>1</sup> The National Register Bulletin No. 15, *How to Apply the National Register Criteria for Evaluation* (“NRB 15”) further contextualizes this definition by stating: “A district derives its importance from being a unified entity ... [it] must be a definable geographic area that can be distinguished from surrounding properties by changes such as density, scale, type, age, style of sites, buildings, structures, and objects, or by documented differences in patterns of historic development or associations. It is seldom defined, however, by the limits of current parcels of ownership, management or planning boundaries. The boundaries must be based upon a shared relationship among the properties constituting the district.”<sup>2</sup>

Section 10 of the National Register Registration Application Form requires applicants to include a Boundary Justification statement that provides an explanation of the reasons for the applicant’s selection of the proposed boundary for the nominated historic property or district.<sup>3</sup> National Register Bulletin No. 16A, titled *How to Complete the National Register Registration Form* (“NRB 16A”), further explains the required level of detail to be included in the justification statement, and specifically notes that “Properties with substantial acreage require more explanation than those confined to small city lots.”<sup>4</sup> In addition, NRB 16A lists the following guidelines for applicants to review and consider while choosing an appropriate boundary line for a property or district:

1. For All Properties:<sup>5</sup>
  - a. Carefully select boundaries to encompass, but not exceed the full extent of the significant resources and land area making up the property.

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<sup>1</sup> 36 CFR §60.3. *Note*, in the instant case, the Proposed District has been concurrently nominated for listing in both the State and National Registers. Pursuant to 9 NYCRR §427.1(a), in the event of a concurrent listing proposal, review for listing in the State register shall primarily be done in accordance with the National Register nomination review process: “(a) Except as provided for in subdivision (b) of this section, all proposals for the listing of properties on both the National Register and State Register shall be submitted, reviewed and acted upon in accordance with the regulations governing the *National Register* (emphasis added) ...”. Unless specifically noted otherwise herein, all analyses discussed in this document will have been undertaken and performed through the lens of the applicable federal regulatory analysis mechanisms as required by 36 CFR Part 60, and also in compliance with 9 NYCRR §427.1.

<sup>2</sup> See, National Register Bulletin No. 15, *How to Apply the National Register Criteria for Evaluation*: <https://www.nps.gov/nr/publications/bulletins/nrb15/>, p. 5-6 (hereinafter “NRB 15”).

<sup>3</sup> See, National Register Bulletin No. 16A, *How to Complete the National Register Registration Form*, <https://www.nps.gov/nr/publications/bulletins/nrb16a/>, p. 54-57, Appendix IV:1 (hereinafter “NRB 16A”).

<sup>4</sup> *Id.* at 55

<sup>5</sup> *Id.* at 56





- b. The area to be registered should be large enough to include all historic features of the property, but should not include “buffer zones” or acreage not directly contributing to the significance of the property.
  - c. Leave out peripheral areas of the property that no longer retain integrity, due to subdivisions, development or other changes.
2. *Specifically For Historic Districts*.<sup>6</sup> Select boundaries to encompass the single area of land containing the significant concentration of buildings, sites, structures, or objects making up the district. The district's significance and historic integrity should help determine the boundaries. Consider the following factors:
- a. Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character.
  - b. Visual changes in the character of the area due to different architectural styles, types or periods, or to a decline in the concentration of contributing resources.
  - c. Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch.
  - d. Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.

**B. Analysis & Application to Proposed District**

The Proposed District in this instance spans 359.82 acres, and the boundary is explained by the Applicant in the Boundary Justification portion of the Nomination Application's Section 10 as follows: “The boundary was drawn to encompass the tract assembled by the New York State Teachers College at New Paltz for the Ashokan Field Campus in 1957.”<sup>7</sup>

Immediately following Section 10 are four aerial maps of the Proposed District, which have been collectively attached hereto as Exhibit “A” for your review in conjunction herewith. The first three maps depict the outer boundary points of the Proposed District as viewed from various heights and scales, all of which are clearly measurable and discernable using the informational keys provided at the bottom of each of the respective maps.<sup>8</sup> The fourth map/site plan, titled, “Ashokan Field Campus Historic District Site Plan” (“Site Plan”), is an unscaled aerial photograph showing a small fraction of the acreage comprising the Proposed District. The exact amount of acres and scale of this Site Plan is unascertainable given the information provided by

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<sup>6</sup> *Id.* at 56-57

<sup>7</sup> Nomination Application p. 29.

<sup>8</sup> DEP understands and acknowledges that these three maps were included in the Applicant's Nomination Application to fulfill the Verbal Boundary Description requirements of Section 10.





the Applicant. However, DEP staff familiar with the property confirmed upon review that the Site Plan did in fact depict a small, concentrated area within the Proposed District boundary that is home to a large majority of the Nomination Application's listed complying and non-complying structures, sites and buildings ("Site Plan Area").<sup>9</sup> In addition, the Applicant also included a fifth aerial map/photograph, titled "Ashokan Field Campus Historic District Photo Key" on page 38 of the Nomination Application, which is attached hereto as Exhibit "B" and attempts to numerically depict the approximate locations of all of the contributing and non-contributing resources found throughout the Proposed District.<sup>10</sup> As was the case with the preceding Site Plan, this fifth aerial image also fails to disclose the amount of acreage shown in the photo or the scale/height at which the image was taken. In addition it fails to show the greater boundary line of the Proposed District in relation to the concentration of contributing and noncontributing resources labeled numerically thereon.

In an effort to better understand the boundary of the Proposed District in conjunction with the location of the concentration of contributing and noncontributing resources discussed in the Nomination Application, DEP composed an aerial map of the Proposed District using its in-house Geographic Information Systems technology. This map, which is attached hereto as Exhibit "C", shows, among other things, the total boundary lines of the 359.82-acre Proposed District, as well as the general location of the Site Plan Area referenced above.<sup>11</sup> A plain review of this map supports the conclusion that the boundary of the Proposed District far exceeds the concentrated Site Plan Area. In addition, when this map is viewed alongside the Applicant's fifth aerial image attached hereto as Exhibit "B", DEP's position that the contributing and noncontributing resources are concentrated in a specific, smaller area of the Proposed District, is only further reinforced.

As aforementioned in the Governing Regulations & NPS Technical Guidance Section above, a District is "a geographically definable area ... possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development."<sup>12</sup> DEP acknowledges that a *portion* of the Proposed District may be a geographically definable area possessing a significant concentration of sites, buildings, structures, or objects; however notwithstanding, DEP contests the overall boundary of the Proposed District as labeled and justified in Section 10 for the following reasons:

1. The Proposed District's boundary and the encompassing 359.82-acre geographic area is too expansive and as such, is not distinguishable from surrounding properties by changes such as density, scale, type, age, style of

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<sup>9</sup> *Id.* at 33.

<sup>10</sup> *Id.* at 38. Note, DEP takes issue with the overall accuracy and numerical formatting used in this map, which it discusses at greater length in Section IV of these Comments.

<sup>11</sup> Due to the lack of information provided in support of the Site Plan, the exact range and acreage of the Site Plan Area could not be depicted on DEP's attached map. Instead, DEP has circled the general Site Map Area in red on its map for your reference and review.

<sup>12</sup> 36 CFR §60.3





sites, buildings, structures, and objects.<sup>13</sup> In fact, the opposite is true. A large portion of the Proposed District is vacant and contains no evidence of historical remnants. Instead these areas are likely nothing more than densely forested woods that house no contributing or noncontributing sites, buildings, structures or objects. As the Applicant noted itself on page 3 of the Nomination Application, "most of the property is second growth forest."

2. The Applicant's boundary justification fails to sufficiently explain the extensive 359.82-acre boundary line of the Proposed District as encouraged by NRB 16A.<sup>14</sup> There are substantial portions of the Proposed District that are indistinguishable with no evidence of significance, and as such, arguably amount to nothing more than improper acreage buffer zones. Without further explanation from the Applicant in the Boundary Justification as to why these additional vacant acres should be included in the Proposed District, the Boundary Justification is insufficient.
3. The forested, indistinguishable areas of the Proposed District lack integrity, stemming from the 2008 tract sale and subsequent subdivision into three parcels whereby DEP acquired ownership of the central parcel for purposes of operation of the NYC Water Supply System, and the Ashokan Field Institute, Inc. acquired the remaining two buffering parcels.

### **Section I Conclusion**

For the reasons set forth above, DEP believes that the boundary of the Proposed District is excessive and as such cannot be included in the National and State Registers at this time.

- II. The integrity of a majority of the Proposed District's contributing resources have been compromised, and the Applicant has not properly discussed or demonstrated that these contributing resources individually and/or collectively qualify the Proposed District for any of the Criteria Considerations enumerated in 36 CFR §60.4;**

#### **A. Governing Regulations & NPS Technical Guidance**

The "Criteria Considerations" section of 36 CFR §60.4 lists certain types of properties that ordinarily, due to their nature, will not be considered or deemed eligible for listing. Properties on this list include, but are not limited to:

- i. Structures that have been moved from their original locations,
- ii. Reconstructed historic buildings, and/or
- iii. Properties primarily commemorative in nature.<sup>15</sup>

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<sup>13</sup> See NRB 15 p. 5-6.

<sup>14</sup> NRB 16A at 55

<sup>15</sup> See 36 CFR §60.4





However, 36 CFR §60.4 goes on to list limited, “special circumstances” also known as “criteria considerations”, which operate to requalify these ordinarily ineligible properties for listing despite their disqualifying properties:

“such properties will qualify if they are integral parts of districts that do meet the criteria of [*sic*]<sup>16</sup> if they fall within the following categories:

- a. ...
- b. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- c. ...
- d. ...
- e. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- f. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance ...”<sup>17</sup>

NRB 15 further clarifies that “the Criteria Considerations need to be applied only to *individual* properties. Components of eligible districts do not have to meet the special requirements unless they make up the majority of the district or are the focal point of the district.”<sup>18</sup>

NRB 16A instructs applicants to complete the Criteria Considerations portion of Section 8 of the National Register Registration Application as follows:

“Mark an ‘x’ in the box for any criteria consideration applying to the property. Mark all that apply. Leave this section blank if no considerations apply ... For **districts**, mark only the criteria considerations applying to the entire district or to a predominant resource or group of resources within the district.”<sup>19</sup>

#### **B. Analysis & Application to Proposed District**

The Applicant included a narrative description of each contributing and noncontributing resource comprising the Proposed District in Section 5 of its Nomination

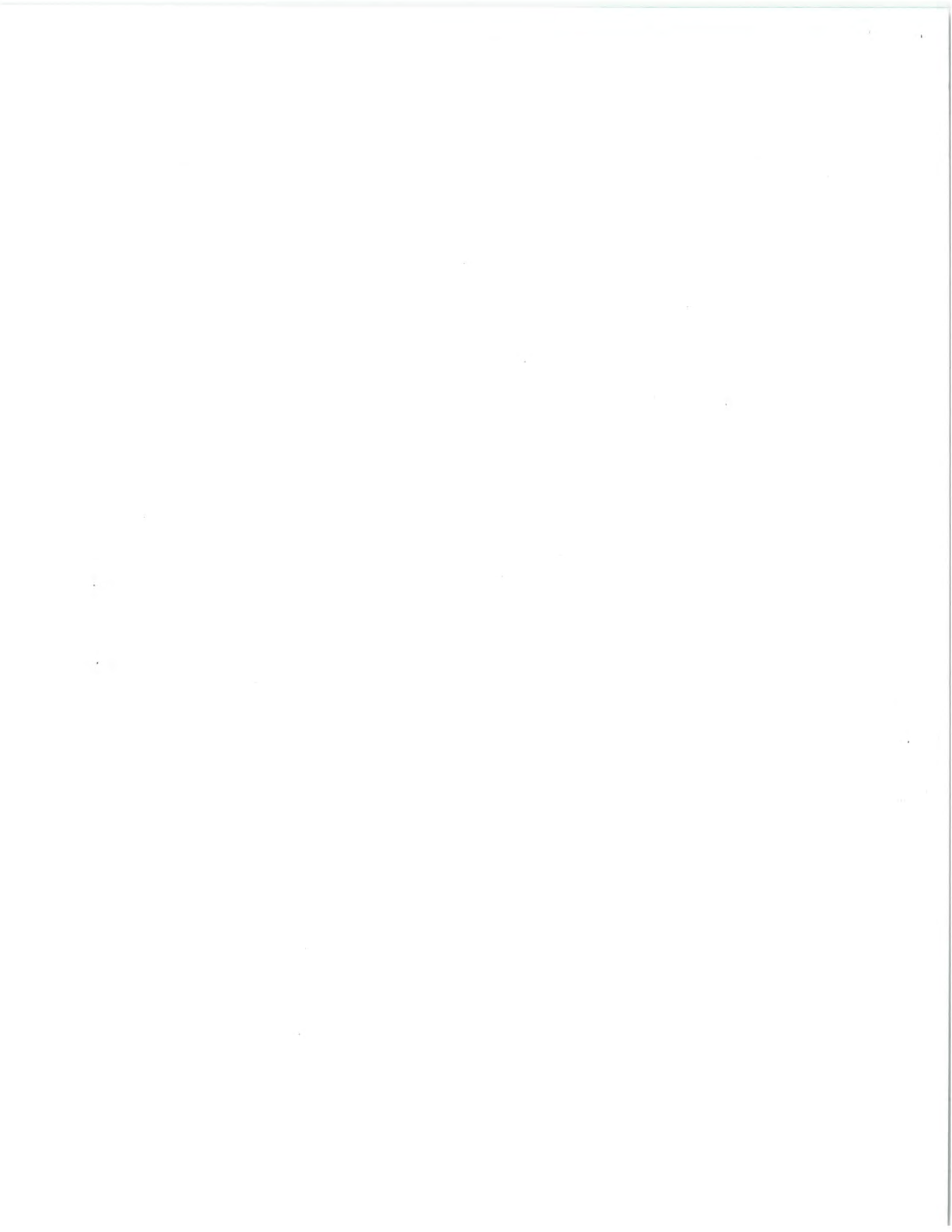
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<sup>16</sup> *Note*, this seems to be a drafting error that is contained in the most current version of regulation. Based on additional analysis of NRB 15 p. 25, DEP believes the word “of” as used here, should instead be replaced with the word “or”. In the event this interpretation is improper, DEP requests further interpretative guidance from the SHPO and/or the National Parks Service.

<sup>17</sup> *Id.* Note, DEP has only listed the portions of the regulatory exemptions herein that it believes could possibly apply to the Proposed District.

<sup>18</sup> NRB 15 at 25

<sup>19</sup> NRB 16A at 36





Application. However, upon review of applicable federal regulations and NPS technical guidance bulletins, DEP submits that a large number of the Proposed District's purported contributing resources do not qualify as such because their historic integrity has been compromised due to movement, reconstruction, and/or the nature of the property as primarily commemorative in nature.<sup>20</sup>

DEP hereby comments on the following contributing resources in the Proposed District and questions them for their historic integrity and/or significance:

1. **Winchell Moehring House** – this building has been substantially reconstructed and repurposed since it was first built in the 18<sup>th</sup> century. Most recently, in 2015, a metal roof was added to the building, which brings the building's historic integrity into question. In addition, although the building has been in continuous use since the 18<sup>th</sup> century, the types of uses and functional purposes of the structure have varied substantially over time and most of the uses do not directly relate to the operation of the Ashokan Field Campus.
2. **Moehring Barn** – this building has been reconstructed in the last 5 years. According to the description, in 2015, a metal roof was added, and later in 2017, solar panels were installed. Further, this building's uses have varied greatly over time.
3. **Wagon Shed** – a review of the attached photo of this structure indicates that it was possibly reconstructed through the addition of a metal roof and solar panels; however, it is worth noting that this work was not detailed in the description section of the Nomination Application.<sup>21</sup>
4. **Granary** – DEP questions when the concrete elevation of this building occurred as noted in Section 5. Based on the description provided, it is not evident whether the elevation was undertaken at the time the building was erected, or instead at some later date. Further, the description states that the building “was built ... following traditional models to develop a farmyard with buildings *typical of the 19<sup>th</sup> century period*” (emphasis added), which DEP believes, without additional detailed information, is indicative of a structure that is primarily commemorative in nature.
5. **Smokehouse** – the description states that the building “was built ... following *traditional models* to develop a homestead with buildings *typical of the 19<sup>th</sup> century period*” (emphasis added), which DEP believes, without additional detailed information, is indicative of a structure that is primarily commemorative in nature.

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<sup>20</sup> See generally 36 CFR §60.4 *Criteria Considerations (b),(e),(f)*

<sup>21</sup> Note, DEP had some issues identifying each structure based on the attached photos because the photos were not labeled.





6. **Winchell's Falls & Hudson River Pulp & Paper Mfg. Co. Dam and Mill Site** – DEP questions the historic integrity and significance of this resource as a contributing property. Based on the scant information provided in the Section 5 description, it is very unclear how this site, and its historical context, contribute and connect to the Proposed District.
7. **Ashokan – Turnwood Covered Bridge** – this site is presently on the National Register of Historic Places and as such is not counted towards the total count of contributing resources within the Proposed District. It is worth noting that this bridge was substantially reconstructed in 2016 under the direction and supervision of the Ashokan Center. DEP was not involved in the reconstruction project and is unaware of how the work could have or did impact the bridge's National Register listing status.
8. **Print Shop** – as noted in the Section 5 description, this structure was originally built for a law office in Tillson, New York (near New Paltz) and was subsequently moved to its current location by camp staff in 1970. DEP questions this structure's historic integrity as a structure moved from its original location, and as a potentially reconstructed historic building.
9. **Old Foundation, 19th century** – DEP questions the historic integrity and significance of this property as it relates to the historical context and operations of this Ashokan Field Campus Historic District. The description states: "cellar hole for an unknown building with stone walls on four sides believed to be associated with Lemuel Winchell. *The site has been partially disturbed by amateur excavations by campers over the years, but may retain some archaeological potential.*" This site description is vague and raises questions as to how this site qualifies as a contributing source. In addition, in light of the campers' amateur excavation activities, it is arguable that the site's historic integrity has been compromised.
10. **Picnic Pavilion** – the description provided for this structure is extremely vague and it is unclear how this structure contributes to the Proposed District's historic significance.
11. **Sauna** – the description provided for this structure is extremely vague and it is unclear how this structure contributes to the Proposed District's historic significance.
12. **Campsite** – the description provided for this structure is extremely vague and it is unclear how this structure contributes to the Proposed District's historic significance.

As noted in the Governing Regulations & NPS Technical Guidance portion of this Section, generally individual components of eligible districts do not have to be evaluated individually for their integrity and thereafter be found to individually meet the Criteria





Considerations special requirements. However, individual components of districts *will be* evaluated in this way when properties with compromised integrity and any applicable qualifying criteria components, make up the *majority* of the district or are the focal point of the district.<sup>22</sup> In such a case, the relevant criteria considerations potentially applicable the district and/or the district's majority resource group/properties should be acknowledged as such in Section 8, and the applicability should thereafter be discussed by the applicant.

In the instant case, DEP believes that a majority of the contributing properties that comprise the Proposed District have compromised integrity for one or more of the reasons discussed above. In light of this majority integrity issue, DEP questions the overall integrity of the Proposed District, and posits that the Applicant should have completed the Criteria Considerations portion of Section 8 of the Nomination Application in order to appropriately address these integrity issues. Failure of the Applicant to do so amounts to a serious substantive flaw in the Applicant's Nomination Application. Alternatively, the Applicant could have argued that one or more Criteria Considerations applied to the District as a whole; however, this was not done either. No portion of the Criteria Considerations were addressed by the Applicant in Section 8 of the Nomination Application.

### **Section II Conclusions:**

DEP questions the integrity of a majority of the Proposed District's contributing resources and hereby requests that the Applicant either reevaluate the Nomination Application and revise it accordingly to address the above mentioned integrity issues via Criteria Considerations, or alternatively, requests that the State Board and SHPO deny the Proposed District for listing in the National and State Registers at this time because a majority of the Proposed District's contributing resources as described in the Nomination Application have been shown to have compromised integrity without applicable Criteria Considerations.

### **III. Due to the aforementioned contributing resource integrity issues, the historic significance of the Proposed District is compromised, thereby negating the Proposed District's eligibility for listing; and**

#### **A. Governing Regulations & NPS Technical Guidance**

The portion of 36 CFR §60.4 titled "Criteria for Evaluation" states:

*"The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:*

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or

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<sup>22</sup> NRB 15 at 25





- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.”<sup>23</sup> (emphasis added)

NRB 15 further guides applicants and regulatory reviewers regarding the proper application of the Criteria for Evaluation to properties and districts:

“For a property to qualify for the National Register it must meet one of the National Register Criteria for evaluation by:

- Being associated with an important historic context, *and*
- Retaining historic integrity of those features necessary to convey its significance.”<sup>24</sup>

In regards to historic significance and integrity of districts and the properties that make up those districts, NRB 15 states:

“A district must be *significant* as well as being an identifiable entity. ... *the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.* A district can contain buildings, structures, sites, objects, or open spaces that do not contribute to the significance of the district. *The number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district's integrity*”<sup>25</sup> (emphasis added).

## **B. Analysis & Application to Proposed District**

As discussed in Section II above, DEP questions the integrity of approximately 12 of 17 of the Proposed District’s contributing resources<sup>26</sup>. In light of the Applicant’s failure to address these majority contributing resource integrity issues via discussion and appropriate marking of the Criteria Considerations portion of Section 8 of the Nomination Application, DEP does not think the remaining uncompromised contributing resources individually, or collectively as part of the Proposed District, retain enough historic significance under Criteria A or C as listed in 36 CFR §60.4.

<sup>23</sup> See 36 CFR §60.4

<sup>24</sup> NRB 15 at 3

<sup>25</sup> *Id.* at 5

<sup>26</sup> Note, the reference to 17 contributing resources is derived from page 2, Section 5 of the Nomination Application. However, DEP is unsure of the total number of contributing resources proposed by the Applicant in the application because the total number (17) listed in Section 5, does not fully match up with the total number of contributing properties listed later in Section 7.





As NRB 15 states, "*the number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district's integrity*"<sup>27</sup> The Applicant's failure to rehabilitate the compromised integrity of the 12 contributing resources listed in Section II significantly impacts the District's integrity as a whole. Once the 12 resources are removed as contributing resources and reallocated as noncontributing, the Proposed District overall is left with just a total of 5 contributing resources, and 26 noncontributing resources (12 of which are have integrity issues) which are all concentrated in one relatively distinct section of the 359.82-acre Proposed District. The only logical conclusion that can result is that the District's overall integrity has been severely compromised, which in turn prevents the District from effectively conveying its sense of time, place, and historical development. As a result, the Proposed District is not historically significant and does not meet Criteria for Evaluation (a) and (c) as stated in the Nomination Application.

In addition, separate and apart from the integrity issue, is the fact that Period of Significance described by the Applicant in Section 8 (spanning 1785 – 1970) does not logically reflect or appropriately relate in any way to the boundary line justification in Section 10.<sup>28</sup> The applicant states the following as the justification for the chosen period of significance:

"The Period of Significance was drawn to encompass the varied and evolving history of the property. It begins with Lemuel Winchell's ca. 1785 house, which may be located on earlier foundations, and extends until ca. 1970, when the majority of the buildings associated with the Ashokan Field Campus, a college-based outdoor education program, had been completed. The property has continued to function as a camp focused on the ecological and cultural history of the Catskills region to the present day."<sup>29</sup>

DEP fails to see how the boundary line is justified or significant when compared against the Applicant's period of significance statement. This analysis only further supports DEP's position that the Proposed District is ineligible for listing at this time because the Applicant has failed to prove its significance, and has also failed to demonstrate that it is an identifiable entity based on its boundary lines and the resources contained therein.

### **Section III Conclusions**

For the above-listed reasons, the resource integrity issues discussed in Section II, and the improper boundary justification discussed in Sections I and III hereof, collectively detrimentally impact the Proposed District's historic significance to such an extent that the District does not qualify for listing under Criteria for Eligibility (A) and (C) (36 CFR §60.4).

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<sup>27</sup> NRB 15 at 5

<sup>28</sup> See generally Nomination Application page 29, stating: "the boundary was drawn to encompass the tract assembled by the New York State Teachers College at New Paltz for the Ashokan Field Campus in 1957."

<sup>29</sup> *Id.* at 12.





**IV. The Nomination Application as submitted is incomplete, lacks a substantial amount of required discussion and information, and contains numerous inconsistencies and errors, and therefore should be deemed incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time.**

**A. Governing Regulations & NPS Technical Guidance**

60 CFR §60.6(k) states:

**(k)** Nominations approved by the State Review Board and comments received are then reviewed by the State Historic Preservation Officer and if he or she finds the nominations to be *adequately documented and technically, professionally, and procedurally correct and sufficient and in conformance with National Register criteria for evaluation*, the nominations are submitted to the Keeper of the National Register of Historic Places, National Park Service, United States Department of the Interior, Washington, D.C. 20240. All comments received by a State and notarized statements of objection to listing are submitted with a nomination”<sup>30</sup> (emphasis added)

Additional review guidance is provided in the National Park Service’s “Technical Review Checklist” and “Substantive Checklist”<sup>31</sup> which respectively highlight the various potential consistency, technical and substantive issues commonly identified by the reviewers.

**B. Analysis & Application to Proposed District**

A cursory review of the Nomination Application using the National Park Service’s “Technical Review Checklist” and “Substantive Checklist” as a guide reveal the following consistency, technical and substantive issues within the Nomination Application. DEP encourages the State Board, SHPO and Keeper to review the Nomination Application with the below spotted issues in mind, and conclude that the Nomination Application as submitted in its current form is incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time

- The total number of contributing and noncontributing resources listed in Sections 5 and 7 are inconsistent.
- The Chart contained on pages 5/6 of the application contains several formatting errors that combine contributing and noncontributing resources into one line item.
- Labeling of Photos and Figures. The photos are referenced by number in the description portions of the Nomination Application, but then are not numbered as appended. Figures are numbered as appended, however some of the Figures are also photos, which resulted in substantial confusion during review.
- The map on page 38 titled “Ashokan Field Campus Historic District Photo Key”– references photos “40, 41, 42” – these are not photos appended or referenced anywhere in the application. They specifically do not correspond with any

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<sup>30</sup> 36 CFR §60.6

<sup>31</sup> See *National Review Checklists* available for download at <https://www.nps.gov/nr/publications/forms.htm>





contributing/noncontributing items listed in Section 7, pages 5/6 as the rest of the numbers in the map do.

- Section 7, Resource No. 29 Campsite – is noted as “2 buildings”, but it is unclear whether these two buildings are counted as distinct contributing resources or one single resource.
- Descriptions of the resources in Section 7 are inconsistent in length and detail, and in many places unclear and seemingly incomplete – particularly with respect to the listed items that are labeled contributing resources. The descriptions for these resources becomes more inadequate as the list progresses.
- Alterations that occurred to the listed resources have not been adequately described in the application, or at times even mentioned at all.
- DEP is named at the “Department of Environmental Education” within Application (see page 3 Summary Paragraph).
- Properties have been altered and the differences between the original and current conditions/appearances is not clearly established or described in accordance with the applicable federal regulations.
- Section 3 of the Application is partially completed and should be completely left blank and filled in by State and National Register review agencies.

### **General Conclusion**

DEP, as an interested property owner whose land falls within the Proposed District, hereby submits these Nomination Application comments for review and consideration by New York State Board of Historic Preservation, the New York State Historic Preservation Officer, the National Park Service and the Keeper of the National Register of Historic Places, as applicable, for their respective use and consideration while reviewing Applicant’s Nomination Application and determining the eligibility of the Proposed District for listing in the National and/or State Registers. Based on the reasons set forth above, DEP does not believe the Proposed District is eligible for listing at this time in either the State or the National Register. Should any of the reviewing person(s) or agencies wish to discuss or clarify DEP’s position(s), you may contact:

Casey McCormack,  
Assistant Counsel,  
DEP Bureau of Legal Affairs  
(718) 595 6503





**EXHIBIT "A"**  
**Boundary Maps & Site Plan**



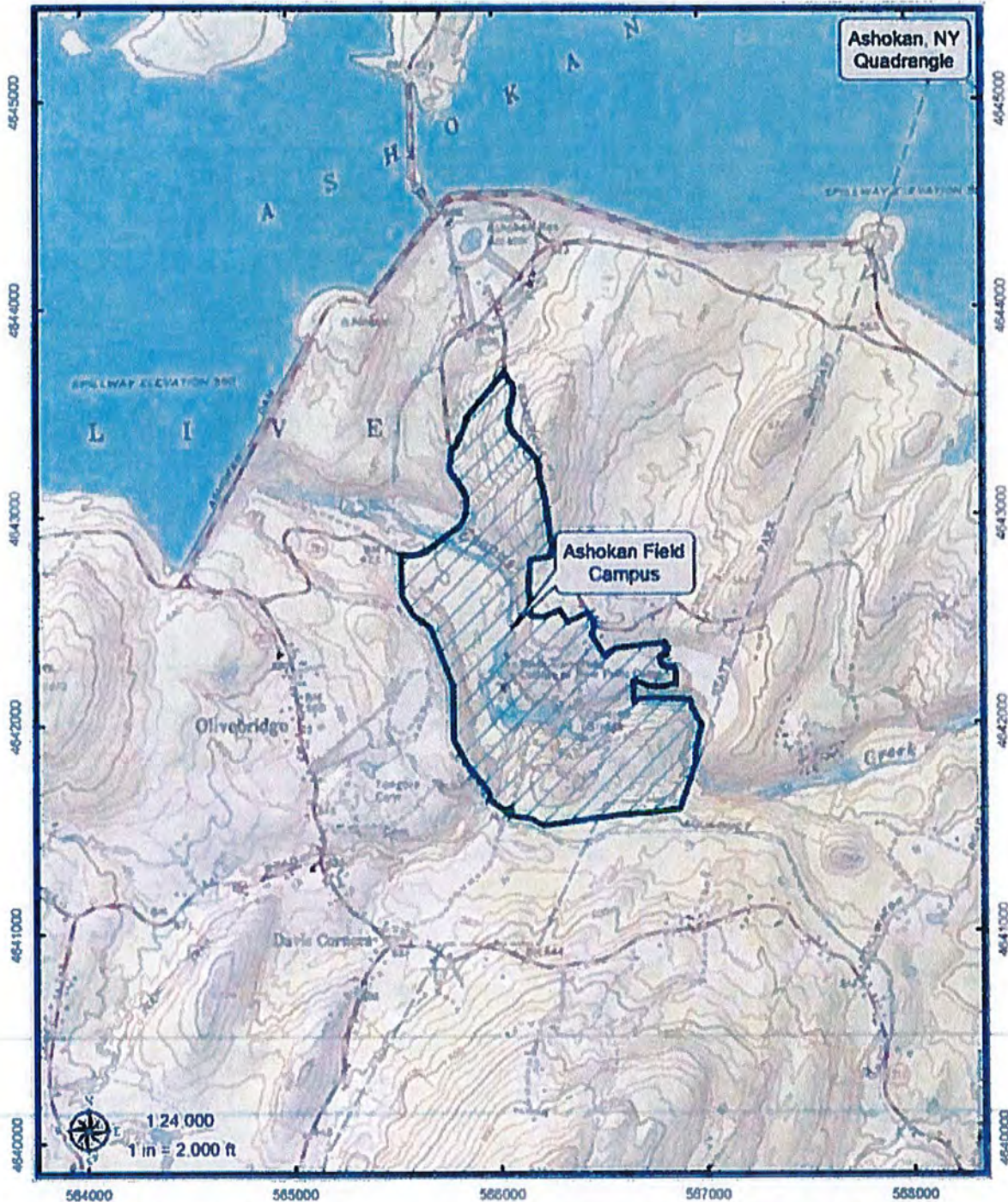


**Ashokan Field Campus Historic District** **DRAFT**  
Name of Property

**Ulster, New York**  
County and State

**Ashokan Field Campus**  
**Olive Bridge, Ulster Co., NY**

**477 Beaverdill Road**  
**Olive Bridge, NY 12461**



Coordinate System: NAD 1983 UTM Zone 18N  
Projection: Transverse Mercator  
Datum: North American 1983  
Units: Meter

0 650 1,300 2,600 Feet



**Parks, Recreation  
and Historic Preservation**  
Division for Historic Preservation



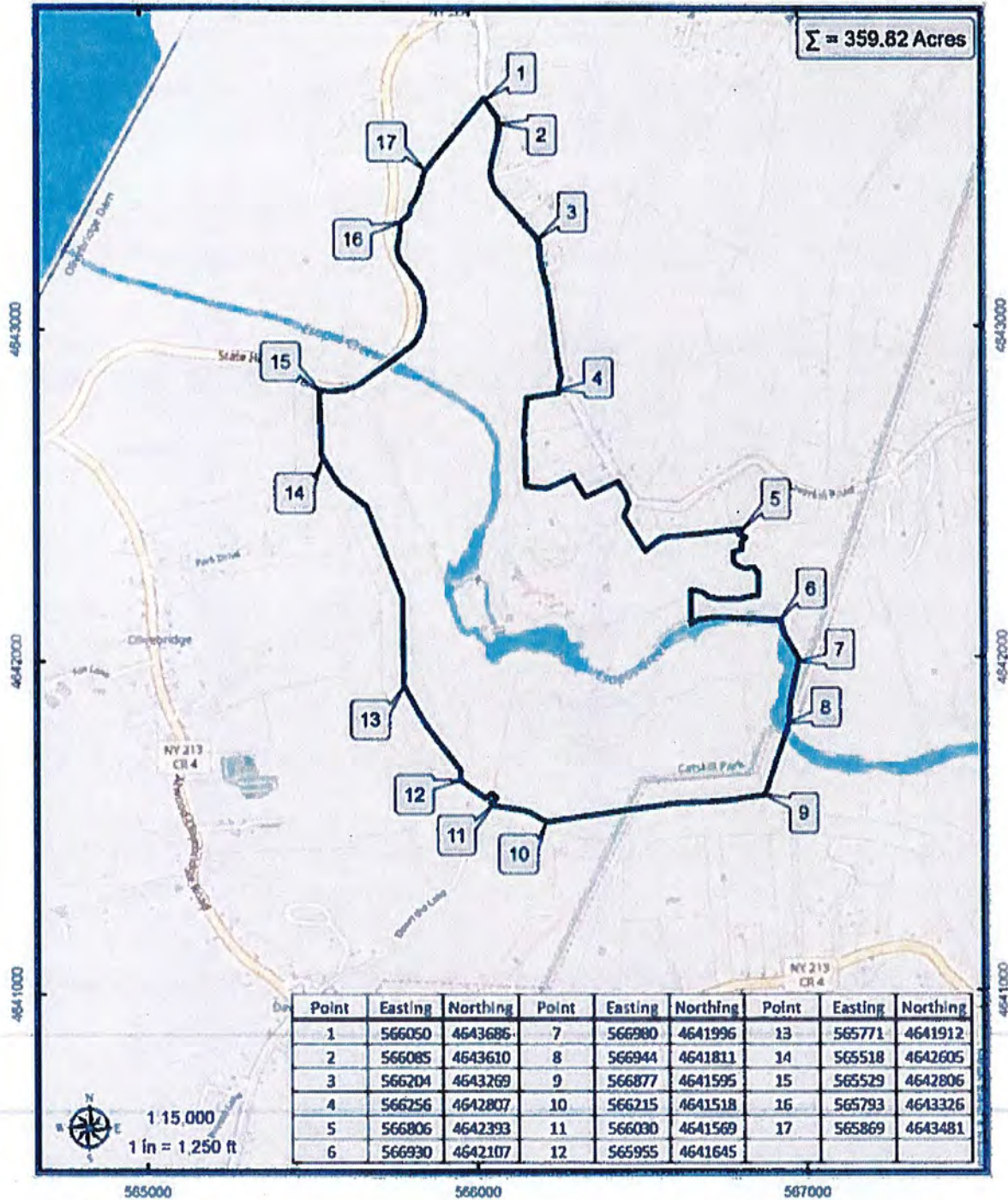


**Ashokan Field Campus Historic District** **DRAFT**  
 Name of Property

**Ulster, New York**  
 County and State

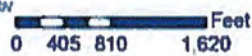
**Ashokan Field Campus**  
**Olive Bridge, Ulster Co., NY**

**477 Beaverkill Road**  
**Olive Bridge, NY 12461**



Point	Easting	Northing	Point	Easting	Northing	Point	Easting	Northing
1	566050	4643686	7	566980	4641996	13	565771	4641912
2	566085	4643610	8	566944	4641811	14	565518	4642605
3	566204	4643269	9	566877	4641595	15	565529	4642806
4	566256	4642807	10	566215	4641518	16	565793	4643326
5	566806	4642393	11	566090	4641569	17	565869	4643481
6	566930	4642107	12	565955	4641645			

Coordinate System: NAD 1983 UTM Zone 18N  
 Projection: Transverse Mercator  
 Datum: North American 1983  
 Units: Meter



**New York State** Parks, Recreation and Historic Preservation  
 Division for Historic Preservation



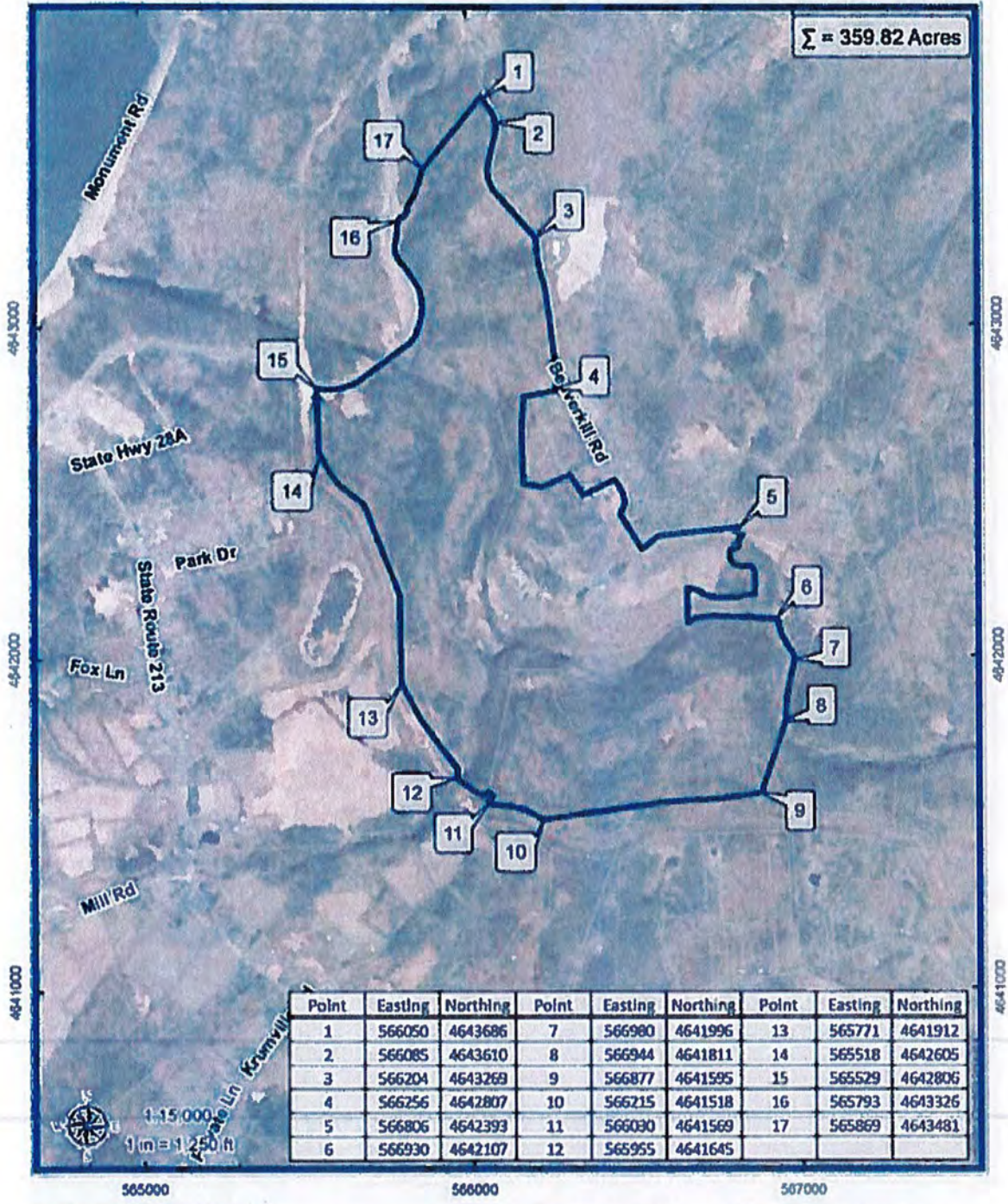


Ashokan Field Campus Historic District **DRAFT**  
 Name of Property

Ulster, New York  
 County and State

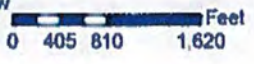
Ashokan Field Campus  
 Olive Bridge, Ulster Co., NY

477 Beaverkill Road  
 Olive Bridge, NY 12461



Point	Easting	Northing	Point	Easting	Northing	Point	Easting	Northing
1	566050	4643686	7	566980	4641996	13	565771	4641912
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Coordinate System: NAD 1983 UTM Zone 18N  
 Projection: Transverse Mercator  
 Datum: North American 1983  
 Units: Meter







Ashokan Field Campus Historic District **DRAFT**  
Name of Property

Ulster, New York  
County and State



Ashokan Field Campus Historic District Site Plan





**EXHIBIT "B"**  
**"Ashokan Field Campus Historic District Photo Key"**



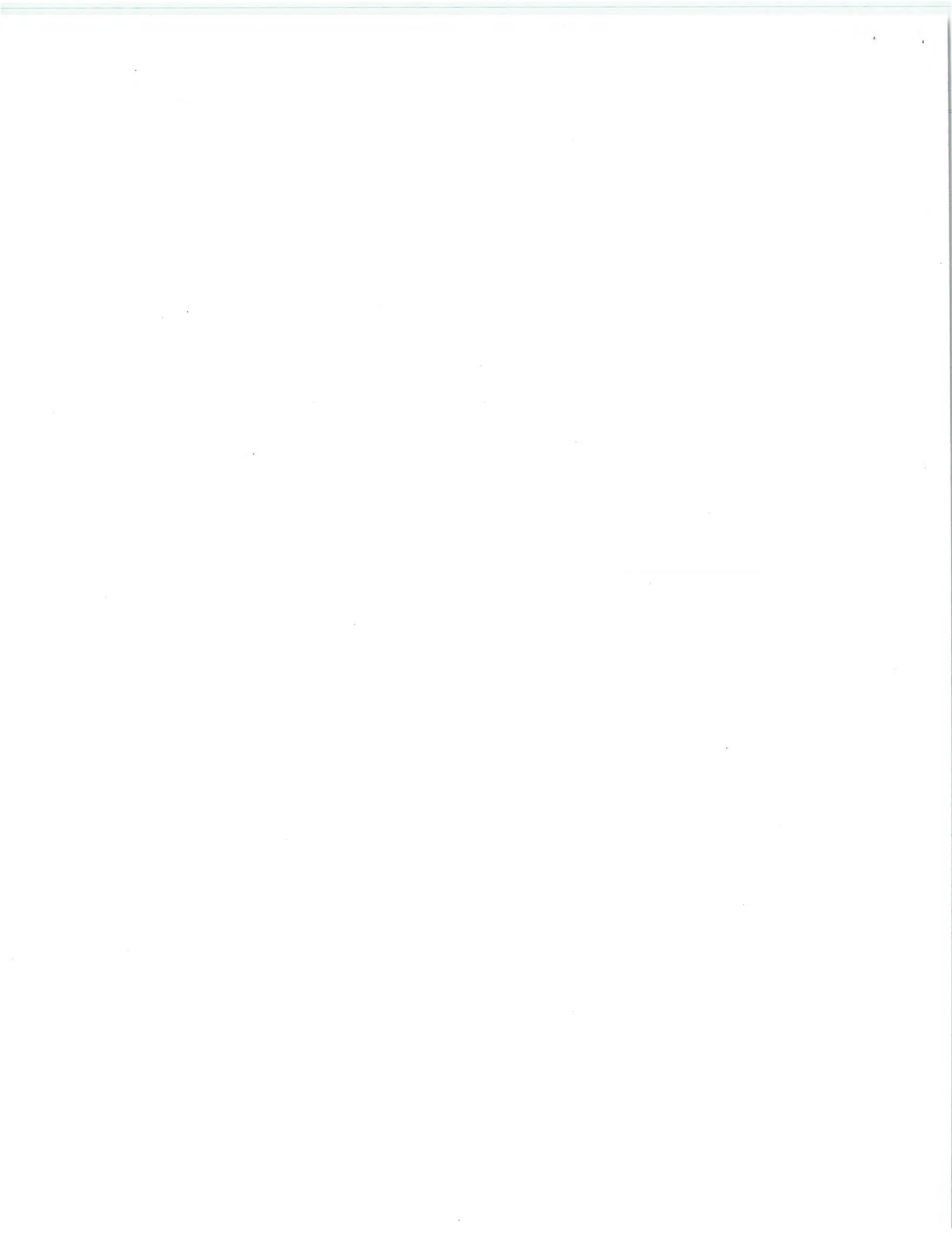


**Ashokan Field Campus Historic District** **DRAFT**  
Name of Property

**Ulster, New York**  
County and State



Ashokan Field Campus Historic District Photo Key

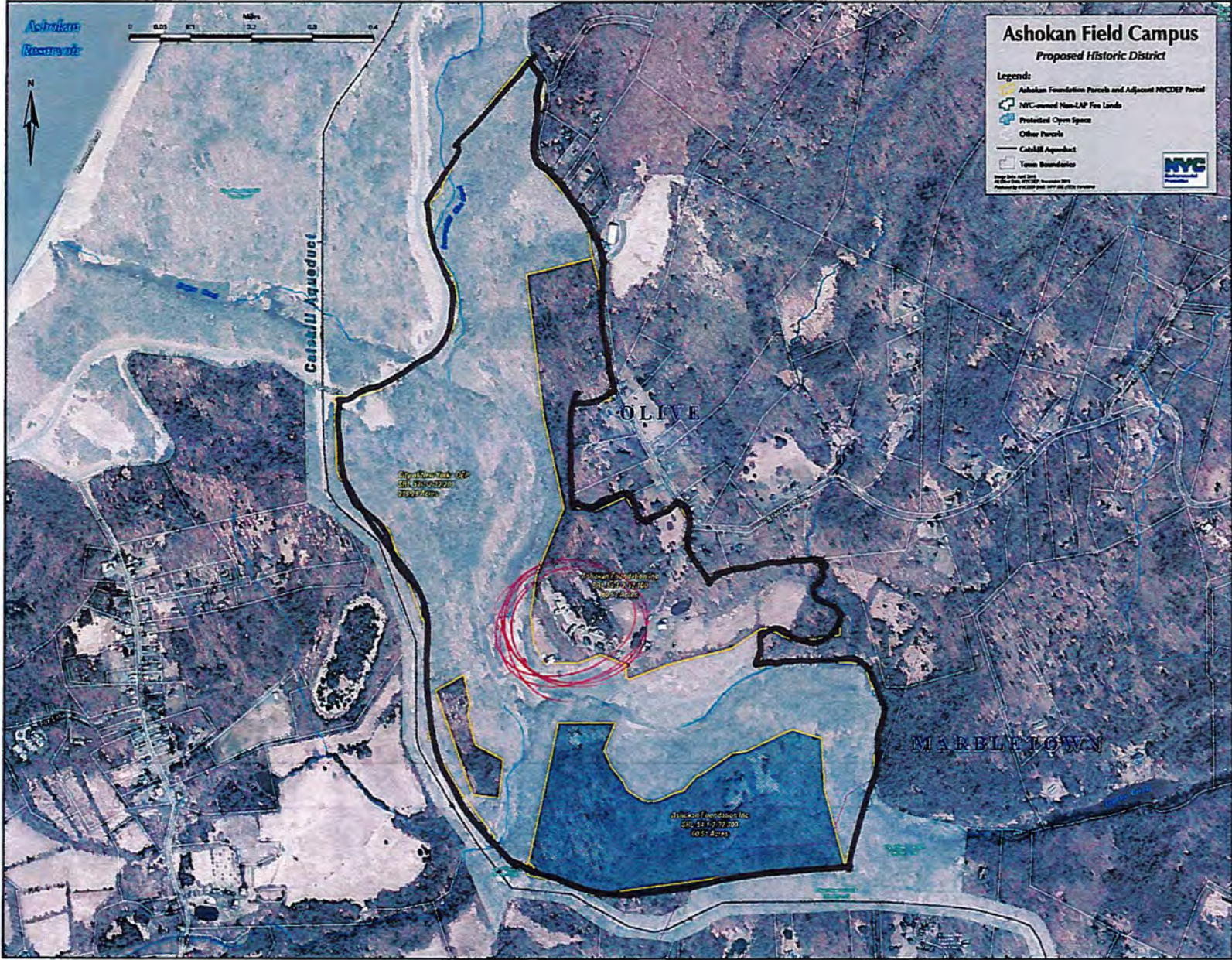




**EXHIBIT "C"**  
**DEP Aerial GIS Map**











TO: State Review Board

FROM: Kathleen LaFrank and Jennifer Betsworth

RE: Ashokan Field Campus Historic District: Response to DEP Memo Questioning Significance and Integrity

DATE: 27 November 2018

### Background

The Ashokan Field Campus Historic District was originally proposed for nomination in 2016 by the Ashokan Center (a private non-profit foundation). Jennifer Betsworth made a site visit and in fall 2016, and, after receiving a request, wrote an initial determination of eligibility in November 2017. After providing advice and guidance to the sponsor and consultant, we received a final draft nomination prepared for the foundation by consultant Neil Larson, of Larson Fisher Associates, in June 2018. After a review that the draft met documentation standards, we notified owners and officials in July 2018 that the nomination was scheduled for review by the State Board for Historic Preservation (SRB) in September SRB. There are *four owners*: the Ashokan Center (141.23 acres); New York City Department of Environmental Protection (219.29 acres), and two private owners, Edward and Gregory Suarez (5.6 acres). After notification, NYC DEP, one of the four owners, requested a postponement for one meeting in order to prepare a report on the district's eligibility. That postponement was granted. In September 2018 we re-notified owners and officials that the nomination would be considered for review by the SRB in December 2018.

### Issues

1. On November 8, 2018, NYC DEP submitted a notarized objection to the nomination. However, under the National Historic Preservation Act, only owners of *private property* may object to nominations. DEP, a New York City agency, is a public owner and has no right to object. Even if DEP did have the right to object to the National Register listing, it is only one of four owners, so its objection could not halt the listing, as no other owners have objected. No owner, public or private, has the right to object to listing under the State Historic Preservation Act.
2. NYC DEP has also submitted a report challenging the eligibility of the nomination. DEP has raised numerous issues, including the fact that the district is "too large," that a "majority of the contributing resources have been compromised," that the "historic significance has been compromised," and that "the application lacks a substantial amount of required discussion and contains numerous inconsistencies." Although the report contains a substantial amount of discussion and quotes numerous NPS regulations and guidance documents, it primarily faults three major premises of the nomination: the boundary, the period of significance, and the integrity of the resources.





In general, DEP's challenges are based on a misunderstanding of the argument for the significance of a large and complex district with multiple layers of significance over a long period of time. Whereas the nomination argument was based on the overall significance of a cultural landscape and how the individual components of that landscape *together* illustrate the larger themes represented, DEP primarily analyzed the individual architectural components, arguing that small changes to individual buildings made them individually non-contributing and, thus, that the district itself was not eligible. In addition, in focusing almost exclusively on the individual architectural elements, DEP showed that it was not familiar with how we evaluate contributing resources in districts; that is, that they contribute to the whole rather than being evaluated as individually significant. DEP also misunderstood some of the NPS definitions for the criteria exceptions, such as those for reconstructions, moved buildings and commemoratives, thus leading it to make judgements about which buildings might be contributing or not as if they were being individually nominated. In addition, architecture is only one of five areas of significance (the others are settlement, industry, education, and recreation), and DEP did not consider how the landscape components also represent the significant themes and contribute to our understanding of the resource. Finally, DEP did not consider the most important thematic component of the nomination, the use of the historic, natural and cultural landscape itself in the development of outdoor educational programs.

#### Specific areas challenged:

##### Period of Significance and Boundary

DEP stated that the period of significance *does not logically and appropriately relate to the boundary.*

*A period of significance* is drawn based on the following information: theme, place, time, and integrity. A resource is significant because it represents important themes in local, state or national history and because there are resources that are intact enough to represent those themes during a certain period of history. This historic district is a large and complex one representing four distinct eras: farm and mill era (1731-1857); pulp and paper manufacturing era (1857-1914); country estate era (1932-1937); and environmental education campus era (1957-1970). The district retains evidence of each of these four periods; specific resources constructed during the stated four periods survive to illustrate the themes of settlement, architecture, industry, recreation, and education. The period of significance was appropriately drawn to encompass the property's long, rich and varied history and to include all the significant resources associated with each of the themes represented.

DEP has also challenged the boundary as *too large* and *not distinguishable from the surrounding properties by changes such as density, scale, type, age, style, etc.* DEP argued that the boundary should be limited to the small concentration of buildings, citing, for example, the fact that the nomination author has included a detail map of this concentration as part of the evidence that anything outside the detail map is extraneous. Such a detail map is provided for clarification and photo identification and is not part of the boundary justification. While DEP is correct that boundaries should be





distinguishable, the types of physical features mentioned are not meaningful unless they are directly related to the precise history of the property being nominated and here they are not. These questions might be more relevant in an urban residential district where they might be used to define a neighborhood; however, these buildings do not constitute a neighborhood. The larger problem is that DEP does not seem to accept the argument that the significance of the property is greater than that represented only by the architecture of the buildings.

*Boundaries* are drawn to encompass the entire historic significance of the property; they should include the fullest extent of the historic resource, including all relevant historic features. Boundaries relate directly to the historic themes and the period of significance and, for rural historic districts, almost always include more than just buildings, encompassing historic landscapes, agricultural fields, circulation systems, industrial sites, recreational landscapes, etc. In this district, the opening sentence states that the district is significant for its *illustration of several centuries of continued development of a large tract of land in the Catskill Mountain region of New York State*, beginning with late eighteenth-century Winchell farm and the Winchell family's industrial development of Winchell Falls, followed by its use in the early twentieth-century wood pulp manufacturing industry by several prominent companies, and finally by its mid-twentieth century redevelopment as a children's camp applying an early innovative outdoor education program affiliated with a New York State teachers college. It is also significant for its architectural resources, including its eighteenth-century settlement and those associated with its recreational use in the 1930s. The district boundary was drawn to include the resources associated with these themes. In the significance statement, the nomination author laid out a full explanation, with deed references, for the history, development, and significance of the 359-acre parcel:

**eighteenth century** – full size of 1731 deed is not known; however; resources associated with this theme include the original Winchell-Moehring House, the falls dam site, the foundation site

**nineteenth century** – by 1887, water rights and wood pulp mill had been acquired by Hudson River Pulp and paper; old mill destroyed and rebuilt; new dam and mill were developed 1895-1897; DePont took over the pulp mills on the Esopus in 1905; resources associated with this theme include the Hudson River Pulp & Paper manufacturing dam and mill site, the homestead site

**twentieth century** – 1930-1944; Moehring began assembling tracts totaling 200 acres at Winchell's Falls for recreational purposes; he purchased land, including mill holdings and what remained of Winchell Farm; subsequent purchases include parcels of 95, 73, and 13 acres; resources associated with these purchases include the restored and revitalized Winchell-Moehring House, Moehring Barn, wellhouse

**twentieth century** – 1957 New Paltz purchased 359 acres at Winchell's Falls specifically to create a college campus for recreation and environmental education; this purchase included much of the land associated with the previous three periods that had been consolidated by the purchases in the early twentieth century; resources associated with this theme include Wiggly bridge, picnic pavilion, sauna, pewter shop, print shop, glass shop/blacksmith shop, wagon shed, granary, smokehouse, campsite with lean-tos





The 1957 purchase of 359 acres established the boundary for the nomination. The theme of outdoor education and recreation is the most important one recognized in the nomination and is fully developed and justified in the significance statement. The Ashokan Field Campus is proposed for nomination under this theme at the *state level* because of its association with the development of outdoor education programs in association with the state teachers college at New Paltz in the period 1957-1970. In evaluating the full significance of the property, the core campus buildings reflect only a small part of the program's mission and activity. The innovative environmental education program established here, which focused on exposing children to the natural and cultural environment, learning outside the classroom, promoting the physical and mental fitness of American youth, learning traditional crafts, and teaching courses in fields such as botany, ecology, and conservation, was premised on the idea of experiencing the outdoors and using nature itself as a campus. Educators used the surrounding property, the remains of the previous centuries of occupation on the land, features such as woods, streams, abandoned roads, an old log chute, the ruins of earlier buildings, etc., to teach about the natural and cultural environments, and they developed this land with additional resources that would help them provide recreational opportunities, provide instruction in traditional crafts, and advance educational curriculums. The surrounding land, which was used for hiking, swimming, camping, and educational programming, was directly associated with this major theme. While examples of historic architecture relate to the historic themes represented, architecture is only one small aspect of this district's significance.

#### Integrity of the buildings:

DEP cites a large number of buildings that it believes should not contribute to the significance because they are "substantially reconstructed," because they are "commemorative," because "they have been moved," because they have "varied uses over time," and/or because "it is unclear how they contribute to the historic significance."

For those that DEP describes as *substantially reconstructed*, it cites evidence such as replacement roofs or the addition of solar panels. One example is the Moehring Barn, c1937. Changes such as a new roof or the addition of a solar panel would seldom be enough to render any building non-contributing (although a thoroughly incompatible change in form and size might prompt a careful review of an *individual* building significant *only* for its style). In the case of this barn, the nomination presents a complete history of the barn, noting that it incorporates a possible eighteenth-century foundation, which relates to the earliest use of the property; that it was constructed in 1937, which is one of the major periods of thematic development (resort period); that the camp's first blacksmith forge was installed in its basement, which led directly to its use for education purposes (which is associated with the most important theme of the district, environmental education) and that it is still in use; and that the barn is the centerpiece of a c1970 farmyard compound (which is also directly related to the major historic theme for which the property is being nominated). Item 8 of the nomination has a complete history and analysis of this aspect of the property's significance. Further, DEP misuses the term *reconstruction*, which the NPS considers a building in which *all or most of the fabric is not original*. By no standard used for the NPS are any of the buildings at Ashokan





*substantially reconstructed*, and the judgment of contributing and non-contributing has been carefully made for all district buildings.

DEP cites buildings built following traditional methods of construction as "*commemoratives*." The NPS definition of a commemorative is one that is purposefully designed to commemorate an *important event in the past after that event*. They *derive their aesthetic values from the period of their creation* and they require that some kind of *commemorative activity* occur in remembrance of that event. Campus buildings designed based on historic models and using traditional construction methods might be discussed in the ongoing tradition of reinterpreting the past, but here they relate directly to the theme of educating students about historic folkways and crafts. They do not commemorate a historic event; they do not have a contemporary design that reflects the aesthetic values of the 1970s, and no activity commemorating a past event takes place there. Instead, they are designed based on historic models and are directly related to the campus's educational program, which is one of the major themes of the nomination. Thus, they are important contributing features. They do not meet the definition of commemoratives and do not have to meet the criterion exception.

DEP cites *buildings that have been moved*. Buildings that have been *moved during the period of significance and relate to the property's significance* do not have to meet the criterion consideration for moved buildings. These buildings were moved specifically to be used in the working museum village and rural craft educational function that is one of the major themes of the nomination itself.

DEP cites buildings that have *varied uses over time*, such as the Winchell-Moehring House, as not relating to the significance of the Ashokan Field Campus. Change over time is one of the most enduring concepts of historic preservation, and the significance statement thoroughly documents the long and significant history of the buildings in the district. The Winchell-Moehring House, for example, is architecturally significant as a prominent surviving example of a late eighteenth century dwelling with commercial lodging functions that generally retains its original form and appearance. It also incorporates 1930s changes by an important regional architect known for his contemporary interpretations of historic architecture in "revival" styles that employ features of regional "Dutch" buildings. During this period, the building's function reflected a second important theme, recreation. The building was then reused over the last fifty years for environmental education programs, the district's most important theme. Rather than impacts to integrity, these many layers of architectural and functional changes are the essence of its significance.

DEP also cites several resources because it is unclear *how they contribute to the district's significance*. These include the picnic pavilion, the sauna, and the campsite. These all fall within the themes of recreation and education, which are fully documented in item 8, which explains the importance of recreational activity in the environmental education program.





# FLORENTINE FILMS

Kent Emms

December 4, 2018

Jennifer Betsworth  
NYS Office of Parks, Recreation and Historic Preservation  
625 Broadway  
Albany NY 12207

Dear Ms. Betsworth:

I'm writing in support of the nomination of the Ashokan Field Campus Historic District and to urge the State Board for Historic Preservation to support Ashokan's listing in the State and National Registers of Historic Places.

The Ashokan Field Campus name was changed to the Ashokan Center in 2008, but the programs and mission remain the same. To teach, inspire and build community through shared experiences in nature, history and the arts.

Important features of the history of the Catskill region are clearly represented at Ashokan: from the colonial period, through an agricultural era, to the industrial revolution—a brief period when the property was mostly a recreational site—to Ashokan's role in pioneering outdoor and environmental education in New York State more than fifty years ago.

Children especially, but also adults, are transformed by the experiences in nature that Ashokan offers. And when they return home, they carry something of the power of nature back with them and become citizens of nature, sharing these experiences with their families and friends. They become lifelong advocates for the preservation of natural open spaces, to keep them unsullied by encroaching development. The Ashokan Center has been offering life-changing outdoor and environmental education programs for schools since 1967. Each year thousands of children gain direct access to nature at Ashokan, some for the very first time.





While of course smaller and more intimate than the Grand Canyon or Yosemite, Ashokan is just as important given the transformative effect when you experience the crunch of leaves under your feet, hear the sound of a brook, observe wildlife—things shared by thousands and thousands of children, families and adults of all ages and backgrounds each year.


Ashokan also offers formative firsthand experiences that make history come alive. For instance, students hike across Esopus Creek on the 1885 Covered Bridge that bears a sign that reads, "Ten Dollar Fine for Driving Faster Than a Walk." They're then encouraged to ask what the sign means and learn about the etymology of the word "drive," and they find out that it's about driving your team of horses faster than a walking pace.

On the other side of the Esopus they follow a beautiful woodland trail to the 1830 Homestead. Rather than peering in over a velvet rope, they're met by educators in period dress who welcome them in and show them how to build a fire in the open hearth and cook their lunch in a Dutch oven. In early spring students hike to the Maple Sugar Shack, where they gather sap in buckets, boil it down to syrup and learn how native peoples pioneered this process and taught it to the colonists.

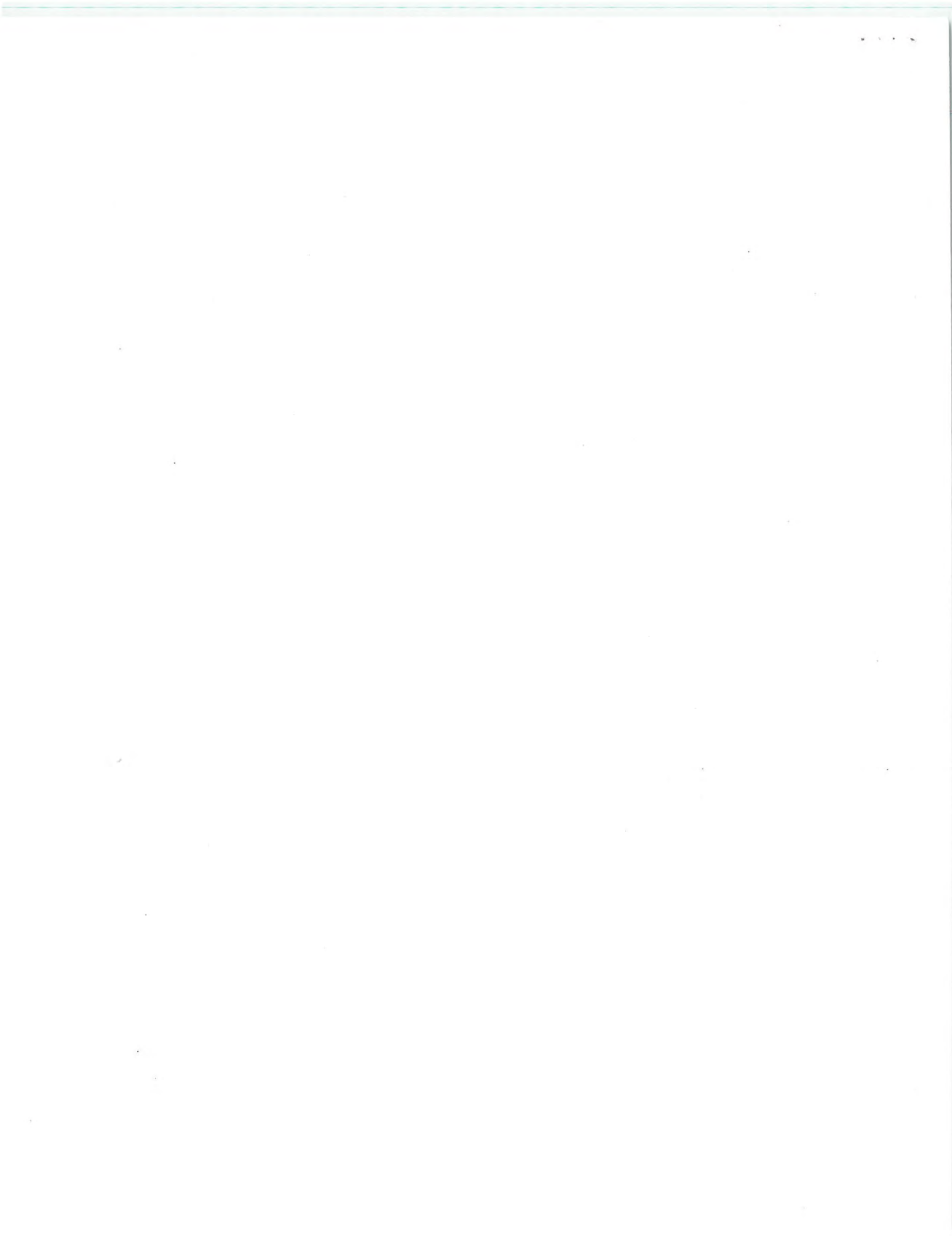
Then there's the Cathedral Gorge hike where students learn about forest succession and see 385 million years of geological history preserved in the gorge walls.

These are just a few of the compelling learning experiences that students and adults alike are able to share at Ashokan. The poet William Blake said that you could find the world in a grain of sand. And just as the cosmos is configured as the atom, so too we can find at Ashokan anything we may want to know about life.

Sincerely,

A handwritten signature in cursive script that reads "Ken Burns". The signature is written in black ink and is positioned below the word "Sincerely,".

Ken Burns





November 30, 2018

Jennifer Betsworth  
Historic Preservation Specialist  
NYS Office of Parks, Recreation and Historic Preservation

Re: Ashokan Field Campus Historic District

Dear Ms. Betsworth:

I am writing to voice my strong support for the nomination of the Ashokan Field Campus Historic District and urge the State Board for Historic Preservation to support its listing on the State and National Registers of Historic Places.

As past President of the Open Space Institute, I worked hand-in-hand with the Ashokan Center to acquire the property some ten years ago and then initiate a disposition plan that included conveying a portion of the property to New York City and a portion to the Ashokan Center while ensuring that the entire property could continue to be used for environmental and cultural education purposes. In the course of two or more years of negotiation, I became intimately familiar with the property, its past use and the vision for its continued use as an environmental and cultural education center.

In 2011, Governor Cuomo appointed, and the State Senate confirmed me as Commissioner of the NYS Department of Environmental Conservation. From my post at DEC, I followed with interest the sensitive restoration and development of the Field Campus to support its wide variety of educational programs. As a result of this effort, now more than ever the Center is a unique combination of historic buildings and artifacts, rustic housing, and fields and forests that provide a unique and enduring educational setting. It is a magical place that deserves its place on the National and State Historic Registers.

Since 1967, virtually every acre of the Ashokan Center property: fields, forests, streams, barns, covered bridge, and architectural ruins, have been used for outdoor education and living history programs. Many school children from throughout the region experience nature for the first time and through the living history programs they experience 18<sup>th</sup> and 19<sup>th</sup> century folkways, lifestyles and culture in the colonial craft shops, 1817 schoolhouse, 1830 homestead, the John Burroughs Writers Cabin and the Maple Sugar Shack. The mill dam and mill site ruins provide an opportunity to learn about an era when water was king. And on a streamside trail along the Esopus Creek, children see first-hand a 385 million-year-old geological record in the walls of the Cathedral Gorge as well as forest succession. The Ashokan property has provided a unique setting for rich cultural learning and life-changing experiences and memories for more than 50 years and will do so for years to come.





It should be recognized and proudly added to the National and State Registers. Thank you for considering my letter of support

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Martens". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Joe Martens  
32 Placid Lane  
Glenmont, New York 12077





**From:** Tim Jensen  
**To:** [Betsworth, Jennifer \(PARKS\)](#)  
**Subject:** Letter in support of the Ashokan Center's designation as a Historic District  
**Date:** Sunday, December 02, 2018 6:36:42 PM

*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

Dear Ms. Betsworth -

I am a Fourth Grade elementary school teacher at The Packer Collegiate Institute in Brooklyn, NY, a school which was established in 1845 and is Brooklyn's oldest private school.

I am writing to strongly support the Ashokan Center's nomination as a Historic District.

Each year for the past ten years Packer has sent its entire Fourth Grade - 66 nine-year-olds - to the Ashokan Center for a four-day, three-night stay in October. We do so in support of our social studies curriculum, which studies colonial life in New York. At Ashokan our students are able to experience blacksmithing, tin smithing, broom making, cider pressing, baking corn bread over a hearth fire, and "learning" in an old one-room school house. They can see the remains of a mill dam and water mill site, and walk across a covered bridge.

These experiences are impossible to provide in New York City, and the annual trip to Ashokan deepens and strengthens our curriculum in ways that students remember for years afterward.

I cannot highly enough praise Ashokan Center for the important work it has done and will continue to do for countless students at Packer Collegiate and many, many other schools. We treasure our visits there, and hope that Ashokan will continue to operate for years to come.

I support without any reservation the Ashokan Center's nomination as a Historic District. Should you have any questions about this, I would be glad to speak further, and can best be contacted by e-mail, or by phone at 917-623-7312.

Thanks for considering this letter in support of Ashokan Center!

Tim Jensen  
Fourth Grade Teacher  
Packer Collegiate Institute, Brooklyn, NY







January 22, 2019

**Vincent Sapienza, P.E.**  
*Commissioner*

**Paul V. Rush, P.E.**  
Deputy Commissioner  
Bureau of Water Supply  
prush@dep.nyc.gov

P.O. Box 358  
Grahamsville, NY 12740  
T: (845) 340-7800  
F: (845) 334-7175

Joy Beasley  
Keeper of the National Register  
Associate Director of Cultural Resources  
Department of the Interior - National Park Service  
1849 C Street, NW – Mail Stop 7228  
Washington, DC 20240

Julie H. Ernstein, Ph.D., RPA  
Acting Chief, National Register & National Historic Landmarks Program  
Deputy Keeper of the National Register  
Department of the Interior - National Park Service  
1849 C Street, NW – Mail Stop 7228  
Washington, DC 20240

Re: The Ashokan Field Campus Historic District National  
Register Nomination

Dear Ms. Beasley and Ms. Ernstein:

The New York City Department of Environmental Protection (DEP) submits this comment letter in regards to the New York State Historic Preservation Officer's (SHPO) nomination of The Ashokan Field Campus Historic District's (District) for listing in the National Register of Historic Places. As the agency responsible for delivering high quality and plentiful water to half the population of New York State, DEP respectfully requests that in the Department of the Interior's (DOI) review of this nomination, it consider the vital role of DEP's infrastructure located within the bounds of the District. DEP is mindful of the need to preserve historical resources, while ensuring it has the required flexibility to utilize its assets that fall within the District.

New York City's water supply system, which is one of the oldest, largest and most complex surface water supplies in the world, is comprised of three separate reservoir systems: the Croton, the Catskill and the Delaware. DEP, as the operator of the system, provides an average of 1.1 billion gallons of water to nine million New York City residents and visitors in addition to one million residents living north of the City in Orange, Putnam, Ulster, and Westchester counties.





The District falls within the Catskill water supply system and encompasses property and critical water supply assets owned by New York City. In particular, the Ashokan Release Channel (ARC) runs through two DEP-owned parcels that comprise a portion of the District. As explained below, ARC is an important asset in enabling DEP to operate the Catskill system as an unfiltered supply, in compliance with the federal Safe Drinking Water Act and Surface Water Treatment Rule (SWTR), and it is imperative that DEP has the continued flexibility to operate and adjust ARC as needed to ensure the water supply system remains in compliance with these laws.

ARC is a concrete canal, constructed in the early 1900s, that is used to convey water from the Ashokan Reservoir—currently up to 600 million gallons per day—in a controlled manner from the reservoir through the upper and lower gate chambers to the Old Esopus Creek. DEP's strategic use of ARC enables it to address water quality concerns that can arise during, and following, intense storm events. In addition, ARC can be used proactively to benefit the surrounding communities by enabling DEP to create a void in the Ashokan Reservoir upstream of ARC, thus making room in the Ashokan Reservoir to capture additional flows before a large storm event or when seasonal runoff is expected to be high. For these reasons, DEP's continued use of ARC assists DEP in ensuring the delivery of high quality water during such events, as well as complying with the stringent federal and state requirements to maintain an unfiltered supply.

DEP and the City of New York have a deep appreciation for the preservation of historically significant properties. That said, DEP also has concerns about the inclusion of the City's property as part of the District. See attached letter of objection and comments articulating these concerns, which DEP submitted to SHPO on November 8, 2018 (SHPO Comments). DEP requests that DOI and the Keeper be mindful of these concerns in reviewing the District's nomination. In the event DOI and the Keeper determine that the District is eligible and/or approved for listing, DEP urges DOI and the Keeper to consider revising and limiting the boundary line of the District before making such determination, as suggested by DEP in the SHPO Comments. Alternatively, in the event DOI and the Keeper determine the District to be eligible and/or confirmed for listing with the boundary line as-is, then DEP requests that DOI and the Keeper recognize, in making this determination, the critical role of ARC and the City's need for flexibility in its future use, despite its location within the District.

Thank you for your time and consideration in this matter.

Sincerely,

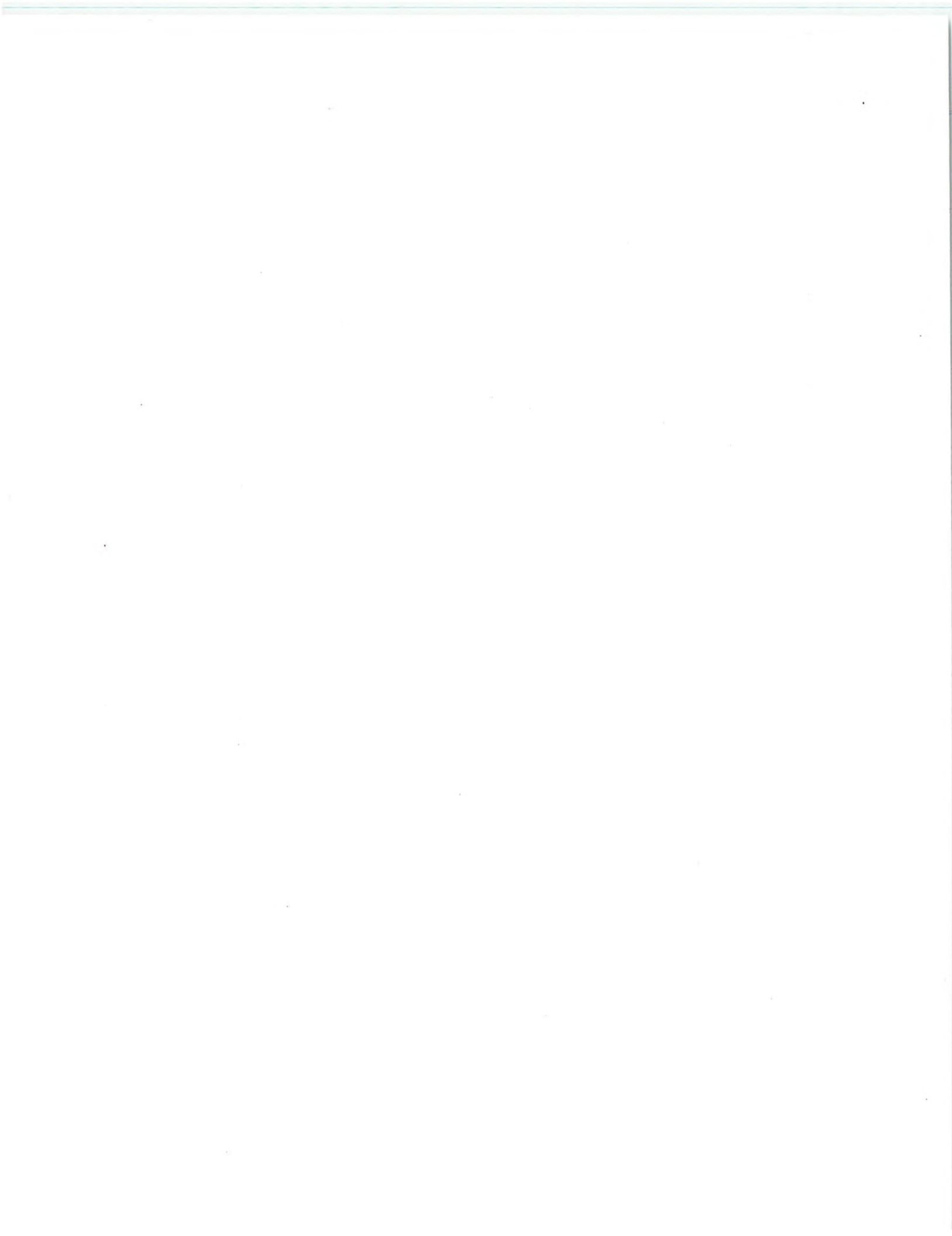


Paul V. Rush, P.E.  
Deputy Commissioner





- c: Rose Harvey, State Historic Preservation Officer**
- Daniel Mackay, Deputy State Historic Preservation Officer**
- David Warne, DEP Assistant Commissioner, Bureau of Water Supply**
- Robin Levine, DEP, Bureau of Legal Affairs**
- Casey McCormack, DEP, Bureau of Legal Affairs**
- Daniel Mulvihill, DEP, Bureau of Legal Affairs**





**Attachment**

SHPO Comments - November 8, 2018







**Vincent Sapienza, P.E.**  
*Commissioner*

**Paul V. Rush, P.E.**  
Deputy Commissioner  
Bureau of Water Supply  
prush@dep.nyc.gov

P.O. Box 358  
Grahamsville, NY 12740  
T: (845) 340-7800  
F: (845) 334-7175

November 8, 2018

**Commissioner Rose Harvey**  
New York State Historic Preservation Officer  
Commissioner of Parks, Recreation and Historic Preservation  
P.O. Box 189  
Waterford, NY 12188

**Deputy Commissioner R. Daniel Mackay**  
Deputy Commissioner for Historic Preservation  
Deputy State Historic Preservation Officer  
NYS Parks, Recreation and Historic Preservation  
P.O. Box 189  
Waterford, NY 12188

**Re: The Ashokan Field Campus Historic District**  
477 Beaverkill Road,  
Olive Bridge, NY 12461  
Ulster County

Dear Commissioner Harvey and Deputy Commissioner Mackay:

I am writing on behalf of the City of New York ("City") and the New York City Department of Environmental Protection ("DEP") who hereby object to and comment on the designation and listing of the "Ashokan Field Campus Historic District" ("Proposed District") in the National and New York State Registers of Historic Places in accordance with 36 CFR §60.6(g) and 9 NYCRR §427.4 respectively.

The Proposed District spans three parcels in Ulster County, New York, two of which are owned by the Ashokan Foundation, Inc. ("AFI Parcels"), one of which is owned by the City, by and through DEP ("DEP Parcel"). On August 21, 2018, DEP received a notice letter from Deputy Commissioner Mackay ("Notice Letter") that stated the Proposed District was being considered by the New York State Board of Historic Preservation for listing in the National and State Registers of Historic Places, and that the DEP Parcel was one of the properties comprising the Proposed District. DEP Assistant Commissioner Dave Warne subsequently requested a copy of the National Register of Historic Places Registration Form that was submitted to your office nominating the Proposed District for listing consideration ("Nomination Application"), for DEP's review and comment, which he received from your office via email on August 30, 2018. On September 10, 2018, DEP requested via letters and emails addressed to each of you that the State Board's consideration of the Proposed District be postponed in accordance with 9 NYCRR 427.4(d) to allow DEP additional time to review the Nomination Application and prepare comments thereto. Division Director Michael F. Lynch notified DEP via email on September 11, 2018 that Deputy





Commissioner Mackay had granted DEP's request for extension to November 9, 2018, to which he attached a signed letter from the Deputy Commissioner effectuating same ("Extension Letter").

Upon further review of the Nomination Application in conjunction with all applicable federal and state law, and supplemental technical guidance bulletins published by the National Parks Service, DEP, acting on behalf of the City as the sole fee simple owner of the DEP Parcel, hereby formally objects to the nomination and listing of the Proposed District in the National Register of Historic Places pursuant to 36 CFR §60.6(g), and in particular, to the inclusion of the DEP Parcel within the Proposed District's boundary line.


DEP submits the attached comments to the Nomination Application ("Comments") in accordance with 9 NYCRR §427.4, and consistent with the submission requirements noted in the Deputy Commissioner's Extension Letter dated September 11, 2018. As further detailed in the attached Comments, DEP contests the eligibility of the Proposed District for listing in both the State and National Registers of Historic Places for the following reasons:

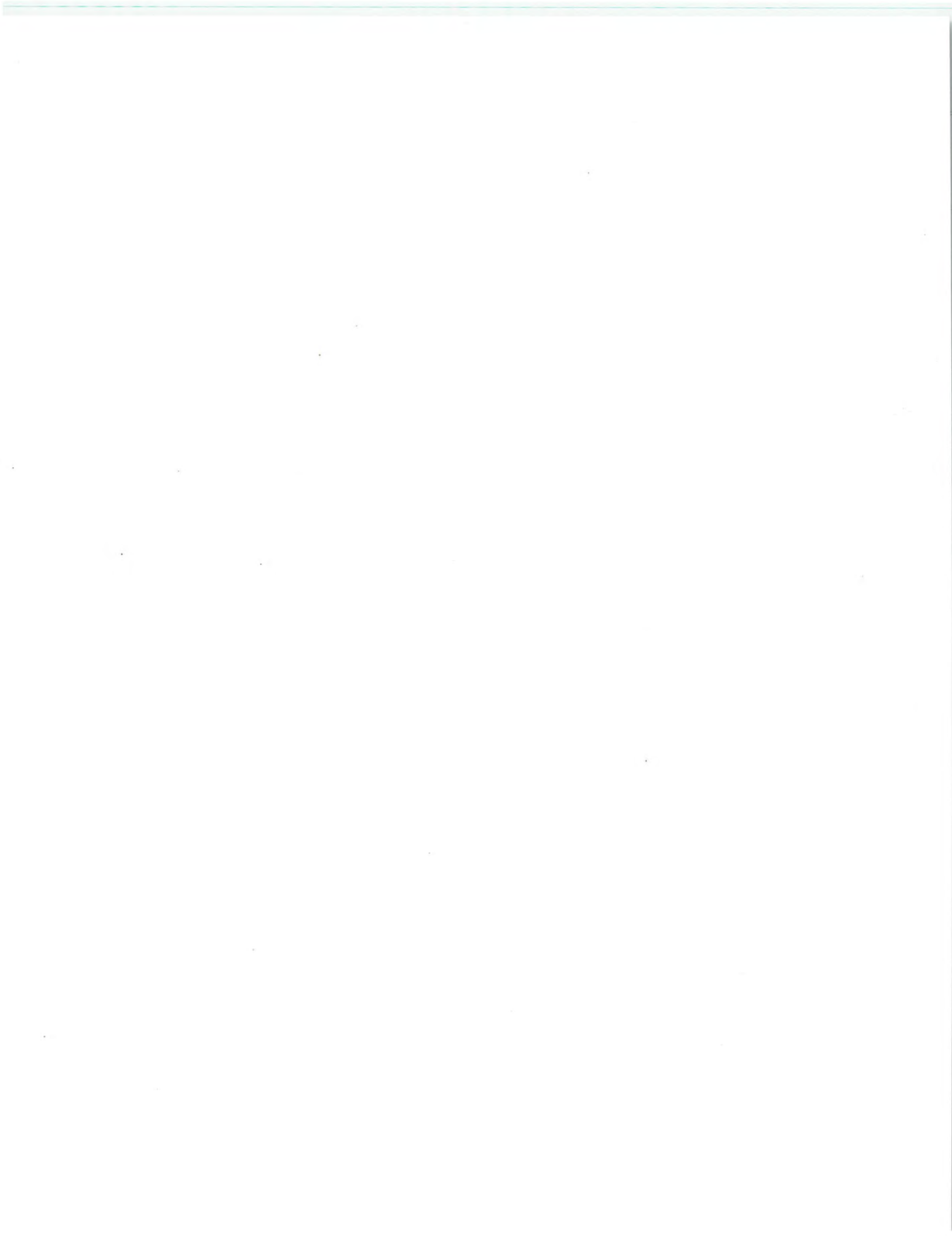
- I. The boundary of the Proposed District is too large and thus is improper for listing in both the National and State Registers as proposed;
- II. The integrity of a majority of the Proposed District's contributing resources have been compromised, and the Applicant has not properly discussed or demonstrated that these contributing resources individually and/or collectively qualify the Proposed District for any of the Criteria Considerations enumerated in 36 CFR §60.4;
- III. Due to the aforementioned contributing resource integrity issues, the historic significance of the Proposed District is compromised, thereby negating the Proposed District's eligibility for listing; and
- IV. The Nomination Application as submitted is incomplete, lacks a substantial amount of required discussion and information, and contains numerous inconsistencies, and therefore should be deemed incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time.

DEP respectfully requests that the SHPO and the State Board carefully consider the attached Comments in conjunction with their review(s) of the Nomination Application, and collectively conclude that, based upon the current state of the Nomination Application, the Proposed District is ineligible for listing in the National and State Registers.

Please confirm your timely receipt of this letter and the enclosed Comments. Thank you for your time and consideration.

Sincerely,

  
Paul V. Rush, P.E.  
Deputy Commissioner





- c: Michael Lynch, Division Director, NYS Division for Historic Preservation**
- David Warne, Assistant Commissioner, DEP Bureau of Water Supply**
- Casey McCormack, Assistant Counsel DEP Bureau of Legal Affairs**
- Daniel Mulvihill, Senior Environmental Counsel, DEP Bureau of Legal Affairs**
- Robin Levine, Senior Environmental Counsel, DEP Bureau of Legal Affairs**

STATE OF NEW YORK  
DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
BUREAU OF LEGAL AFFAIRS  
1999





**ACKNOWLEDGEMENT**

STATE OF NEW YORK

SS:

COUNTY OF Sullivan

On the 8<sup>th</sup> day of November in the year 2018 before me, the undersigned, personally appeared **PAUL V. RUSH**, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed same in his capacity, and that by his signature on the within instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

*Pamela Zanetti*

Notary Public

Printed Name: Pamela Zanetti

My Commission Expires:

8/31/22

**PAMELA ZANETTI**  
Notary Public, State of New York  
Residing in the County of Sullivan  
Commission Expires Aug. 31, ~~2018~~ 2022  
Reg. No. 01ZA4714481





**COMMENTS ON THE ASHOKAN FIELD CAMPUS HISTORIC DISTRICT  
NOMINATION APPLICATION TO  
THE STATE & NATIONAL REGISTERS OF HISTORIC PLACES**

**Background**

The City of New York ("City") and the NYC Department of Environmental Protection ("NYCDEP") (the City and NYCDEP shall hereinafter collectively be referred to as "DEP") in accordance with 9 NYCRR §427.4, jointly submit this written statement containing DEP's comments on the National Register of Historic Places Registration Application prepared by Larson Fisher Associates, Inc. ("Applicant") nominating the Ashokan Field Campus Historic District ("Proposed District") for concurrent listing in the New York State and National Registers of Historic Places ("Nomination Application"). The Proposed District is comprised of three parcels located in Ulster County, New York, two of which are owned by the Ashokan Field Institute, Inc. ("AFI Parcels"), and one of which is owned by DEP ("DEP Parcel"). As further explained in the Comments below, DEP believes the Proposed District is ineligible for listing in both the State and National Registers for the following reasons:

- I. The boundary of the Proposed District is too large and thus is improper for listing in both the National and State Registers as proposed;
- II. The integrity of a majority of the Proposed District's contributing resources have been compromised, and the Applicant has not properly discussed or demonstrated that these contributing resources individually and/or collectively qualify the Proposed District for any of the Criteria Considerations enumerated in 36 CFR §60.4;
- III. Due to the aforementioned contributing resource integrity issues, the historic significance of the Proposed District is compromised, thereby negating the Proposed District's eligibility for listing; and
- IV. The Nomination Application as submitted is incomplete, lacks a substantial amount of required discussion and information, and contains numerous inconsistencies, and therefore should be deemed incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time.

DEP respectfully requests that the New York State Board of Historic Preservation, the New York State Historic Preservation Officer, the National Parks Service and the Keeper of the National Register of Historic Places carefully consider these comments in conjunction with the Nomination Application, and respectively conclude that the Proposed District is ineligible for listing in the National and State Registers at this time.

**Comments**

DEP offers the following comments in support of its position that the Proposed District is ineligible for listing in the State and National Registers at this time:





**I. The boundary of the Proposed District is too large and thus is improper for listing in both the National and State Registers as proposed;**

**A. Governing Regulations & NPS Technical Guidance**

36 CFR §60.3 defines a “District” as “a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history.”<sup>1</sup> The National Register Bulletin No. 15, *How to Apply the National Register Criteria for Evaluation* (“NRB 15”) further contextualizes this definition by stating: “A district derives its importance from being a unified entity ... [it] must be a definable geographic area that can be distinguished from surrounding properties by changes such as density, scale, type, age, style of sites, buildings, structures, and objects, or by documented differences in patterns of historic development or associations. It is seldom defined, however, by the limits of current parcels of ownership, management or planning boundaries. The boundaries must be based upon a shared relationship among the properties constituting the district.”<sup>2</sup>

Section 10 of the National Register Registration Application Form requires applicants to include a Boundary Justification statement that provides an explanation of the reasons for the applicant’s selection of the proposed boundary for the nominated historic property or district.<sup>3</sup> National Register Bulletin No. 16A, titled *How to Complete the National Register Registration Form* (“NRB 16A”), further explains the required level of detail to be included in the justification statement, and specifically notes that “Properties with substantial acreage require more explanation than those confined to small city lots.”<sup>4</sup> In addition, NRB 16A lists the following guidelines for applicants to review and consider while choosing an appropriate boundary line for a property or district:

1. For All Properties:<sup>5</sup>
  - a. Carefully select boundaries to encompass, but not exceed the full extent of the significant resources and land area making up the property.

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<sup>1</sup> 36 CFR §60.3. *Note*, in the instant case, the Proposed District has been concurrently nominated for listing in both the State and National Registers. Pursuant to 9 NYCRR §427.1(a), in the event of a concurrent listing proposal, review for listing in the State register shall primarily be done in accordance with the National Register nomination review process: “(a) Except as provided for in subdivision (b) of this section, all proposals for the listing of properties on both the National Register and State Register shall be submitted, reviewed and acted upon in accordance with the regulations governing the *National Register* (emphasis added) ...”. Unless specifically noted otherwise herein, all analyses discussed in this document will have been undertaken and performed through the lens of the applicable federal regulatory analysis mechanisms as required by 36 CFR Part 60, and also in compliance with 9 NYCRR §427.1.

<sup>2</sup> See, National Register Bulletin No. 15, *How to Apply the National Register Criteria for Evaluation*: <https://www.nps.gov/nr/publications/bulletins/nrb15/>, p. 5-6 (hereinafter “NRB 15”).

<sup>3</sup> See, National Register Bulletin No. 16A, *How to Complete the National Register Registration Form*, <https://www.nps.gov/nr/publications/bulletins/nrb16a/>, p. 54-57, Appendix IV:I (hereinafter “NRB 16A”).

<sup>4</sup> *Id.* at 55

<sup>5</sup> *Id.* at 56





- b. The area to be registered should be large enough to include all historic features of the property, but should not include "buffer zones" or acreage not directly contributing to the significance of the property.
  - c. Leave out peripheral areas of the property that no longer retain integrity, due to subdivisions, development or other changes.
2. Specifically For Historic Districts:<sup>6</sup> Select boundaries to encompass the single area of land containing the significant concentration of buildings, sites, structures, or objects making up the district. The district's significance and historic integrity should help determine the boundaries. Consider the following factors:
- a. Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character.
  - b. Visual changes in the character of the area due to different architectural styles, types or periods, or to a decline in the concentration of contributing resources.
  - c. Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch.
  - d. Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.

#### **B. Analysis & Application to Proposed District**

The Proposed District in this instance spans 359.82 acres, and the boundary is explained by the Applicant in the Boundary Justification portion of the Nomination Application's Section 10 as follows: "The boundary was drawn to encompass the tract assembled by the New York State Teachers College at New Paltz for the Ashokan Field Campus in 1957."<sup>7</sup>

Immediately following Section 10 are four aerial maps of the Proposed District, which have been collectively attached hereto as Exhibit "A" for your review in conjunction herewith. The first three maps depict the outer boundary points of the Proposed District as viewed from various heights and scales, all of which are clearly measurable and discernable using the informational keys provided at the bottom of each of the respective maps.<sup>8</sup> The fourth map/site plan, titled, "Ashokan Field Campus Historic District Site Plan" ("Site Plan"), is an unscaled aerial photograph showing a small fraction of the acreage comprising the Proposed District. The exact amount of acres and scale of this Site Plan is unascertainable given the information provided by

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<sup>6</sup> *Id.* at 56-57

<sup>7</sup> Nomination Application p. 29.

<sup>8</sup> DEP understands and acknowledges that these three maps were included in the Applicant's Nomination Application to fulfill the Verbal Boundary Description requirements of Section 10.





the Applicant. However, DEP staff familiar with the property confirmed upon review that the Site Plan did in fact depict a small, concentrated area within the Proposed District boundary that is home to a large majority of the Nomination Application's listed complying and non-complying structures, sites and buildings ("Site Plan Area").<sup>9</sup> In addition, the Applicant also included a fifth aerial map/photograph, titled "Ashokan Field Campus Historic District Photo Key" on page 38 of the Nomination Application, which is attached hereto as Exhibit "B" and attempts to numerically depict the approximate locations of all of the contributing and non-contributing resources found throughout the Proposed District.<sup>10</sup> As was the case with the preceding Site Plan, this fifth aerial image also fails to disclose the amount of acreage shown in the photo or the scale/height at which the image was taken. In addition it fails to show the greater boundary line of the Proposed District in relation to the concentration of contributing and noncontributing resources labeled numerically thereon.

In an effort to better understand the boundary of the Proposed District in conjunction with the location of the concentration of contributing and noncontributing resources discussed in the Nomination Application, DEP composed an aerial map of the Proposed District using its in-house Geographic Information Systems technology. This map, which is attached hereto as Exhibit "C", shows, among other things, the total boundary lines of the 359.82-acre Proposed District, as well as the general location of the Site Plan Area referenced above.<sup>11</sup> A plain review of this map supports the conclusion that the boundary of the Proposed District far exceeds the concentrated Site Plan Area. In addition, when this map is viewed alongside the Applicant's fifth aerial image attached hereto as Exhibit "B", DEP's position that the contributing and noncontributing resources are concentrated in a specific, smaller area of the Proposed District, is only further reinforced.

As aforementioned in the Governing Regulations & NPS Technical Guidance Section above, a District is "a geographically definable area ... possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development."<sup>12</sup> DEP acknowledges that a *portion* of the Proposed District may be a geographically definable area possessing a significant concentration of sites, buildings, structures, or objects; however notwithstanding, DEP contests the overall boundary of the Proposed District as labeled and justified in Section 10 for the following reasons:

1. The Proposed District's boundary and the encompassing 359.82-acre geographic area is too expansive and as such, is not distinguishable from surrounding properties by changes such as density, scale, type, age, style of

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<sup>9</sup> *Id.* at 33.

<sup>10</sup> *Id.* at 38. *Note*, DEP takes issue with the overall accuracy and numerical formatting used in this map, which it discusses at greater length in Section IV of these Comments.

<sup>11</sup> Due to the lack of information provided in support of the Site Plan, the exact range and acreage of the Site Plan Area could not be depicted on DEP's attached map. Instead, DEP has circled the general Site Map Area in red on its map for your reference and review.

<sup>12</sup> 36 CFR §60.3





sites, buildings, structures, and objects.<sup>13</sup> In fact, the opposite is true. A large portion of the Proposed District is vacant and contains no evidence of historical remnants. Instead these areas are likely nothing more than densely forested woods that house no contributing or noncontributing sites, buildings, structures or objects. As the Applicant noted itself on page 3 of the Nomination Application, “most of the property is second growth forest.”

2. The Applicant’s boundary justification fails to sufficiently explain the extensive 359.82-acre boundary line of the Proposed District as encouraged by NRB 16A.<sup>14</sup> There are substantial portions of the Proposed District that are indistinguishable with no evidence of significance, and as such, arguably amount to nothing more than improper acreage buffer zones. Without further explanation from the Applicant in the Boundary Justification as to why these additional vacant acres should be included in the Proposed District, the Boundary Justification is insufficient.
3. The forested, indistinguishable areas of the Proposed District lack integrity, stemming from the 2008 tract sale and subsequent subdivision into three parcels whereby DEP acquired ownership of the central parcel for purposes of operation of the NYC Water Supply System, and the Ashokan Field Institute, Inc. acquired the remaining two buffering parcels.

### **Section I Conclusion**

For the reasons set forth above, DEP believes that the boundary of the Proposed District is excessive and as such cannot be included in the National and State Registers at this time.

- II. The integrity of a majority of the Proposed District’s contributing resources have been compromised, and the Applicant has not properly discussed or demonstrated that these contributing resources individually and/or collectively qualify the Proposed District for any of the Criteria Considerations enumerated in 36 CFR §60.4;**

#### **A. Governing Regulations & NPS Technical Guidance**

The “Criteria Considerations” section of 36 CFR §60.4 lists certain types of properties that ordinarily, due to their nature, will not be considered or deemed eligible for listing. Properties on this list include, but are not limited to:

- i. Structures that have been moved from their original locations,
- ii. Reconstructed historic buildings, and/or
- iii. Properties primarily commemorative in nature.<sup>15</sup>

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<sup>13</sup> See NRB 15 p. 5-6.

<sup>14</sup> NRB 16A at 55

<sup>15</sup> See 36 CFR §60.4





However, 36 CFR §60.4 goes on to list limited, “special circumstances” also known as “criteria considerations”, which operate to requalify these ordinarily ineligible properties for listing despite their disqualifying properties:

“such properties will qualify if they are integral parts of districts that do meet the criteria of [*sic*]<sup>16</sup> if they fall within the following categories:

- a. ...
- b. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- c. ...
- d. ...
- e. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- f. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance ....”<sup>17</sup>

NRB 15 further clarifies that “the Criteria Considerations need to be applied only to *individual* properties. Components of eligible districts do not have to meet the special requirements unless they make up the majority of the district or are the focal point of the district.”<sup>18</sup>

NRB 16A instructs applicants to complete the Criteria Considerations portion of Section 8 of the National Register Registration Application as follows:

“Mark an ‘x’ in the box for any criteria consideration applying to the property. Mark all that apply. Leave this section blank if no considerations apply ... For **districts**, mark only the criteria considerations applying to the entire district or to a predominant resource or group of resources within the district.”<sup>19</sup>

## **B. Analysis & Application to Proposed District**

The Applicant included a narrative description of each contributing and noncontributing resource comprising the Proposed District in Section 5 of its Nomination

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<sup>16</sup> *Note*, this seems to be a drafting error that is contained in the most current version of regulation. Based on additional analysis of NRB 15 p. 25, DEP believes the word “of” as used here, should instead be replaced with the word “or”. In the event this interpretation is improper, DEP requests further interpretative guidance from the SHPO and/or the National Parks Service.

<sup>17</sup> *Id.* Note, DEP has only listed the portions of the regulatory exemptions herein that it believes could possibly apply to the Proposed District.

<sup>18</sup> NRB 15 at 25

<sup>19</sup> NRB 16A at 36





Application. However, upon review of applicable federal regulations and NPS technical guidance bulletins, DEP submits that a large number of the Proposed District's purported contributing resources do not qualify as such because their historic integrity has been compromised due to movement, reconstruction, and/or the nature of the property as primarily commemorative in nature.<sup>20</sup>

DEP hereby comments on the following contributing resources in the Proposed District and questions them for their historic integrity and/or significance:

1. **Winchell Moehring House** – this building has been substantially reconstructed and repurposed since it was first built in the 18<sup>th</sup> century. Most recently, in 2015, a metal roof was added to the building, which brings the building's historic integrity into question. In addition, although the building has been in continuous use since the 18<sup>th</sup> century, the types of uses and functional purposes of the structure have varied substantially over time and most of the uses do not directly relate to the operation of the Ashokan Field Campus.
2. **Moehring Barn** – this building has been reconstructed in the last 5 years. According to the description, in 2015, a metal roof was added, and later in 2017, solar panels were installed. Further, this building's uses have varied greatly over time.
3. **Wagon Shed** – a review of the attached photo of this structure indicates that it was possibly reconstructed through the addition of a metal roof and solar panels; however, it is worth noting that this work was not detailed in the description section of the Nomination Application.<sup>21</sup>
4. **Granary** – DEP questions when the concrete elevation of this building occurred as noted in Section 5. Based on the description provided, it is not evident whether the elevation was undertaken at the time the building was erected, or instead at some later date. Further, the description states that the building “was built ... following traditional models to develop a farmyard with buildings *typical of the 19<sup>th</sup> century period*” (emphasis added), which DEP believes, without additional detailed information, is indicative of a structure that is primarily commemorative in nature.
5. **Smokehouse** – the description states that the building “was built ... following *traditional models* to develop a homestead with buildings *typical of the 19<sup>th</sup> century period*” (emphasis added), which DEP believes, without additional detailed information, is indicative of a structure that is primarily commemorative in nature.

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<sup>20</sup> See generally 36 CFR §60.4 *Criteria Considerations (b),(e),(f)*

<sup>21</sup> Note, DEP had some issues identifying each structure based on the attached photos because the photos were not labeled.





6. **Winchell's Falls & Hudson River Pulp & Paper Mfg. Co. Dam and Mill Site** – DEP questions the historic integrity and significance of this resource as a contributing property. Based on the scant information provided in the Section 5 description, it is very unclear how this site, and its historical context, contribute and connect to the Proposed District.
7. **Ashokan – Turnwood Covered Bridge** – this site is presently on the National Register of Historic Places and as such is not counted towards the total count of contributing resources within the Proposed District. It is worth noting that this bridge was substantially reconstructed in 2016 under the direction and supervision of the Ashokan Center. DEP was not involved in the reconstruction project and is unaware of how the work could have or did impact the bridge's National Register listing status.
8. **Print Shop** – as noted in the Section 5 description, this structure was originally built for a law office in Tillson, New York (near New Paltz) and was subsequently moved to its current location by camp staff in 1970. DEP questions this structure's historic integrity as a structure moved from its original location, and as a potentially reconstructed historic building.
9. **Old Foundation, 19th century** – DEP questions the historic integrity and significance of this property as it relates to the historical context and operations of this Ashokan Field Campus Historic District. The description states: "cellar hole for an unknown building with stone walls on four sides believed to be associated with Lemuel Winchell. *The site has been partially disturbed by amateur excavations by campers over the years, but may retain some archaeological potential.*" This site description is vague and raises questions as to how this site qualifies as a contributing source. In addition, in light of the campers' amateur excavation activities, it is arguable that the site's historic integrity has been compromised.
10. **Picnic Pavilion** – the description provided for this structure is extremely vague and it is unclear how this structure contributes to the Proposed District's historic significance.
11. **Sauna** – the description provided for this structure is extremely vague and it is unclear how this structure contributes to the Proposed District's historic significance.
12. **Campsite** – the description provided for this structure is extremely vague and it is unclear how this structure contributes to the Proposed District's historic significance.

As noted in the Governing Regulations & NPS Technical Guidance portion of this Section, generally individual components of eligible districts do not have to be evaluated individually for their integrity and thereafter be found to individually meet the Criteria





Considerations special requirements. However, individual components of districts *will be* evaluated in this way when properties with compromised integrity and any applicable qualifying criteria components, make up the *majority* of the district or are the focal point of the district.<sup>22</sup> In such a case, the relevant criteria considerations potentially applicable the district and/or the district's majority resource group/properties should be acknowledged as such in Section 8, and the applicability should thereafter be discussed by the applicant.

In the instant case, DEP believes that a majority of the contributing properties that comprise the Proposed District have compromised integrity for one or more of the reasons discussed above. In light of this majority integrity issue, DEP questions the overall integrity of the Proposed District, and posits that the Applicant should have completed the Criteria Considerations portion of Section 8 of the Nomination Application in order to appropriately address these integrity issues. Failure of the Applicant to do so amounts to a serious substantive flaw in the Applicant's Nomination Application. Alternatively, the Applicant could have argued that one or more Criteria Considerations applied to the District as a whole; however, this was not done either. No portion of the Criteria Considerations were addressed by the Applicant in Section 8 of the Nomination Application.

#### **Section II Conclusions:**

DEP questions the integrity of a majority of the Proposed District's contributing resources and hereby requests that the Applicant either reevaluate the Nomination Application and revise it accordingly to address the above mentioned integrity issues via Criteria Considerations, or alternatively, requests that the State Board and SHPO deny the Proposed District for listing in the National and State Registers at this time because a majority of the Proposed District's contributing resources as described in the Nomination Application have been shown to have compromised integrity without applicable Criteria Considerations.

**III. Due to the aforementioned contributing resource integrity issues, the historic significance of the Proposed District is compromised, thereby negating the Proposed District's eligibility for listing; and**

#### **A. Governing Regulations & NPS Technical Guidance**

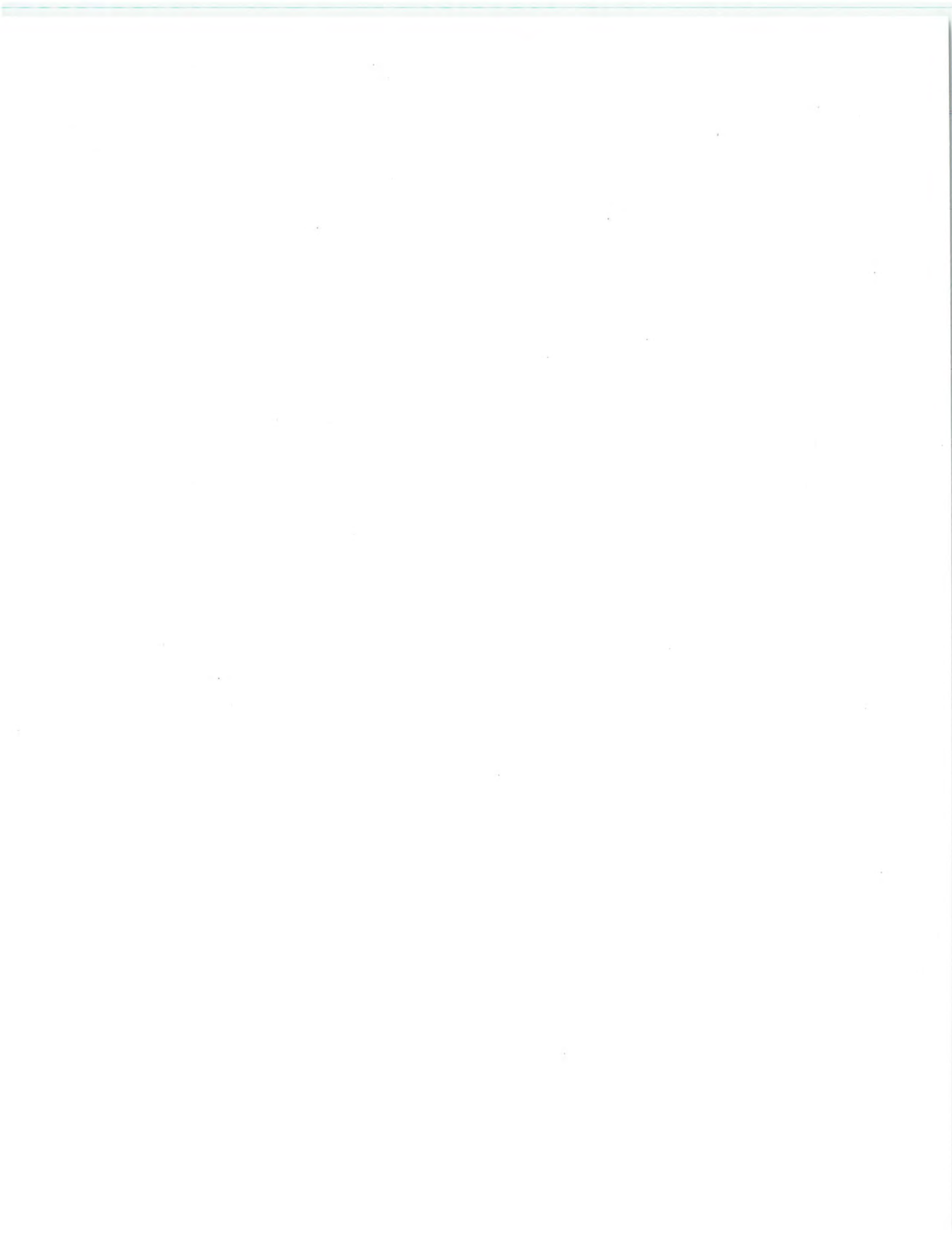
The portion of 36 CFR §60.4 titled "Criteria for Evaluation" states:

*"The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:*

A. That are associated with events that have made a significant contribution to the broad patterns of our history; or

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<sup>22</sup> NRB 15 at 25





- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.”<sup>23</sup> (emphasis added)

NRB 15 further guides applicants and regulatory reviewers regarding the proper application of the Criteria for Evaluation to properties and districts:

“For a property to qualify for the National Register it must meet one of the National Register Criteria for evaluation by:

- Being associated with an important historic context, *and*
- Retaining historic integrity of those features necessary to convey its significance.”<sup>24</sup>

In regards to historic significance and integrity of districts and the properties that make up those districts, NRB 15 states:

“A district must be *significant* as well as being an identifiable entity. ... *the majority of the components that add to the district’s historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.* A district can contain buildings, structures, sites, objects, or open spaces that do not contribute to the significance of the district. *The number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district’s integrity*”<sup>25</sup> (emphasis added).

#### **B. Analysis & Application to Proposed District**

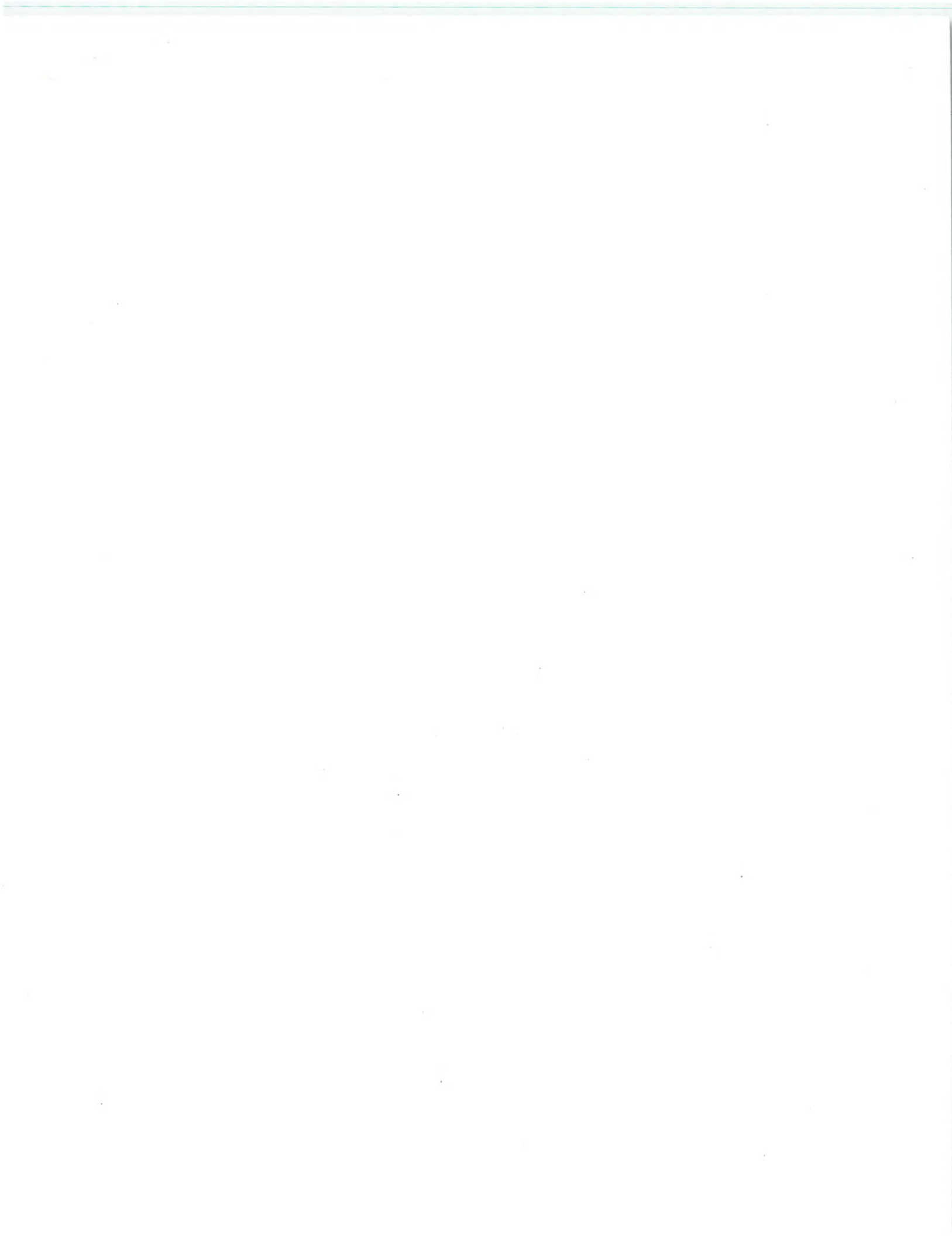
As discussed in Section II above, DEP questions the integrity of approximately 12 of 17 of the Proposed District’s contributing resources<sup>26</sup>. In light of the Applicant’s failure to address these majority contributing resource integrity issues via discussion and appropriate marking of the Criteria Considerations portion of Section 8 of the Nomination Application, DEP does not think the remaining uncompromised contributing resources individually, or collectively as part of the Proposed District, retain enough historic significance under Criteria A or C as listed in 36 CFR §60.4.

<sup>23</sup> See 36 CFR §60.4

<sup>24</sup> NRB 15 at 3

<sup>25</sup> *Id.* at 5

<sup>26</sup> Note, the reference to 17 contributing resources is derived from page 2, Section 5 of the Nomination Application. However, DEP is unsure of the total number of contributing resources proposed by the Applicant in the application because the total number (17) listed in Section 5, does not fully match up with the total number of contributing properties listed later in Section 7.





As NRB 15 states, "*the number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district's integrity*"<sup>27</sup> The Applicant's failure to rehabilitate the compromised integrity of the 12 contributing resources listed in Section II significantly impacts the District's integrity as a whole. Once the 12 resources are removed as contributing resources and reallocated as noncontributing, the Proposed District overall is left with just a total of 5 contributing resources, and 26 noncontributing resources (12 of which are have integrity issues) which are all concentrated in one relatively distinct section of the 359.82-acre Proposed District. The only logical conclusion that can result is that the District's overall integrity has been severely compromised, which in turn prevents the District from effectively conveying its sense of time, place, and historical development. As a result, the Proposed District is not historically significant and does not meet Criteria for Evaluation (a) and (c) as stated in the Nomination Application.

In addition, separate and apart from the integrity issue, is the fact that Period of Significance described by the Applicant in Section 8 (spanning 1785 – 1970) does not logically reflect or appropriately relate in any way to the boundary line justification in Section 10.<sup>28</sup> The applicant states the following as the justification for the chosen period of significance:

"The Period of Significance was drawn to encompass the varied and evolving history of the property. It begins with Lemuel Winchell's ca. 1785 house, which may be located on earlier foundations, and extends until ca. 1970, when the majority of the buildings associated with the Ashokan Field Campus, a college-based outdoor education program, had been completed. The property has continued to function as a camp focused on the ecological and cultural history of the Catskills region to the present day."<sup>29</sup>

DEP fails to see how the boundary line is justified or significant when compared against the Applicant's period of significance statement. This analysis only further supports DEP's position that the Proposed District is ineligible for listing at this time because the Applicant has failed to prove its significance, and has also failed to demonstrate that it is an identifiable entity based on its boundary lines and the resources contained therein.

### **Section III Conclusions**

For the above-listed reasons, the resource integrity issues discussed in Section II, and the improper boundary justification discussed in Sections I and III hereof, collectively detrimentally impact the Proposed District's historic significance to such an extent that the District does not qualify for listing under Criteria for Eligibility (A) and (C) (36 CFR §60.4).

---

<sup>27</sup> NRB 15 at 5

<sup>28</sup> See generally Nomination Application page 29, stating: "the boundary was drawn to encompass the tract assembles by the New York State Teachers College at New Paltz for the Ashokan Field Campus in 1957."

<sup>29</sup> *Id.* at 12.





**IV. The Nomination Application as submitted is incomplete, lacks a substantial amount of required discussion and information, and contains numerous inconsistencies and errors, and therefore should be deemed incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time.**

**A. Governing Regulations & NPS Technical Guidance**

60 CFR §60.6(k) states:

(k) Nominations approved by the State Review Board and comments received are then reviewed by the State Historic Preservation Officer and if he or she finds the nominations to be *adequately documented and technically, professionally, and procedurally correct and sufficient and in conformance with National Register criteria for evaluation*, the nominations are submitted to the Keeper of the National Register of Historic Places, National Park Service, United States Department of the Interior, Washington, D.C. 20240. All comments received by a State and notarized statements of objection to listing are submitted with a nomination<sup>30</sup> (emphasis added)

Additional review guidance is provided in the National Park Service's "Technical Review Checklist" and "Substantive Checklist"<sup>31</sup> which respectively highlight the various potential consistency, technical and substantive issues commonly identified by the reviewers.

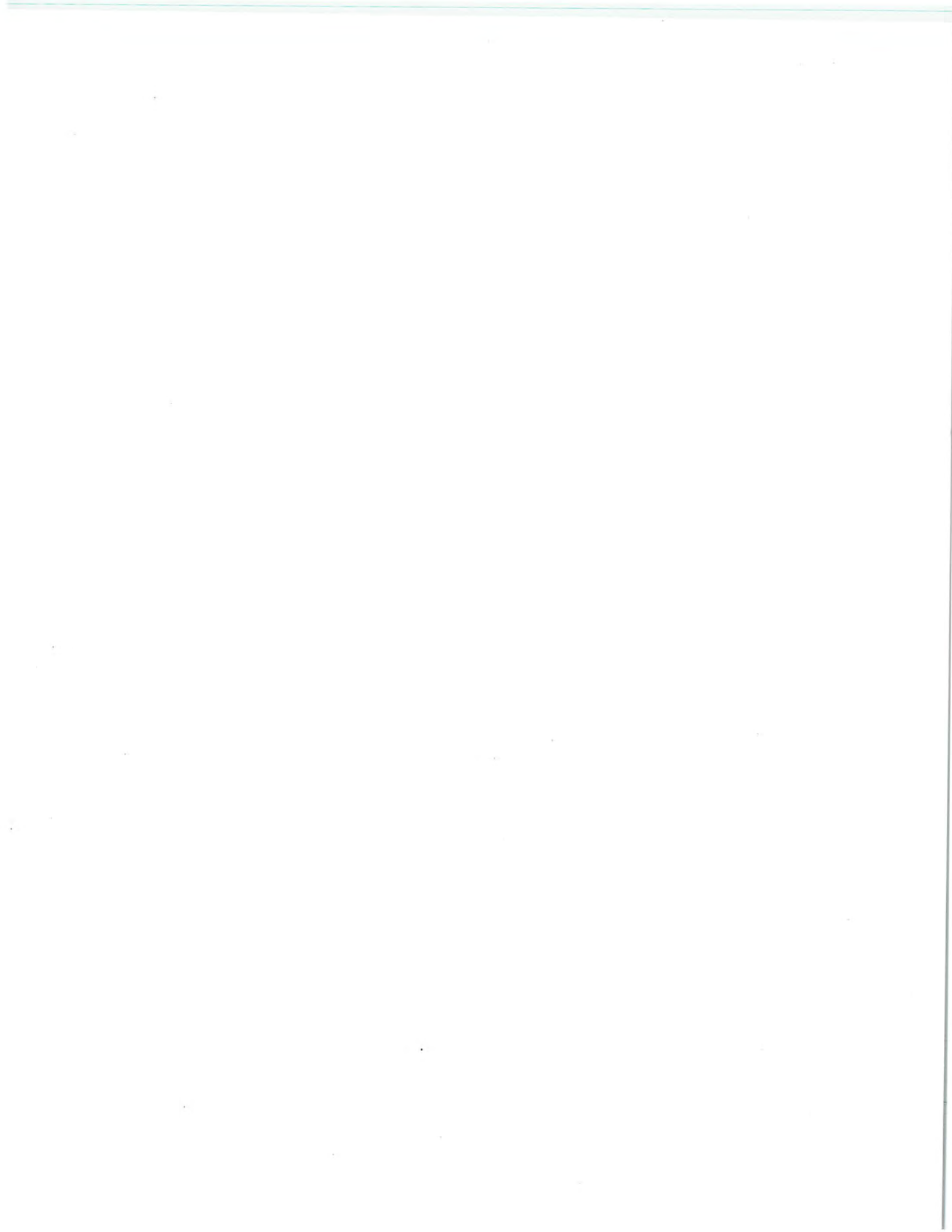
**B. Analysis & Application to Proposed District**

A cursory review of the Nomination Application using the National Park Service's "Technical Review Checklist" and "Substantive Checklist" as a guide reveal the following consistency, technical and substantive issues within the Nomination Application. DEP encourages the State Board, SHPO and Keeper to review the Nomination Application with the below spotted issues in mind, and conclude that the Nomination Application as submitted in its current form is incomplete and insufficient for final State Board review and SHPO listing determination of the Proposed District at this time

- The total number of contributing and noncontributing resources listed in Sections 5 and 7 are inconsistent.
- The Chart contained on pages 5/6 of the application contains several formatting errors that combine contributing and noncontributing resources into one line item.
- Labeling of Photos and Figures. The photos are referenced by number in the description portions of the Nomination Application, but then are not numbered as appended. Figures are numbered as appended, however some of the Figures are also photos, which resulted in substantial confusion during review.
- The map on page 38 titled "Ashokan Field Campus Historic District Photo Key"—references photos "40, 41, 42" — these are not photos appended or referenced anywhere in the application. They specifically do not correspond with any

<sup>30</sup> 36 CFR §60.6

<sup>31</sup> See *National Review Checklists* available for download at <https://www.nps.gov/nr/publications/forms.htm>





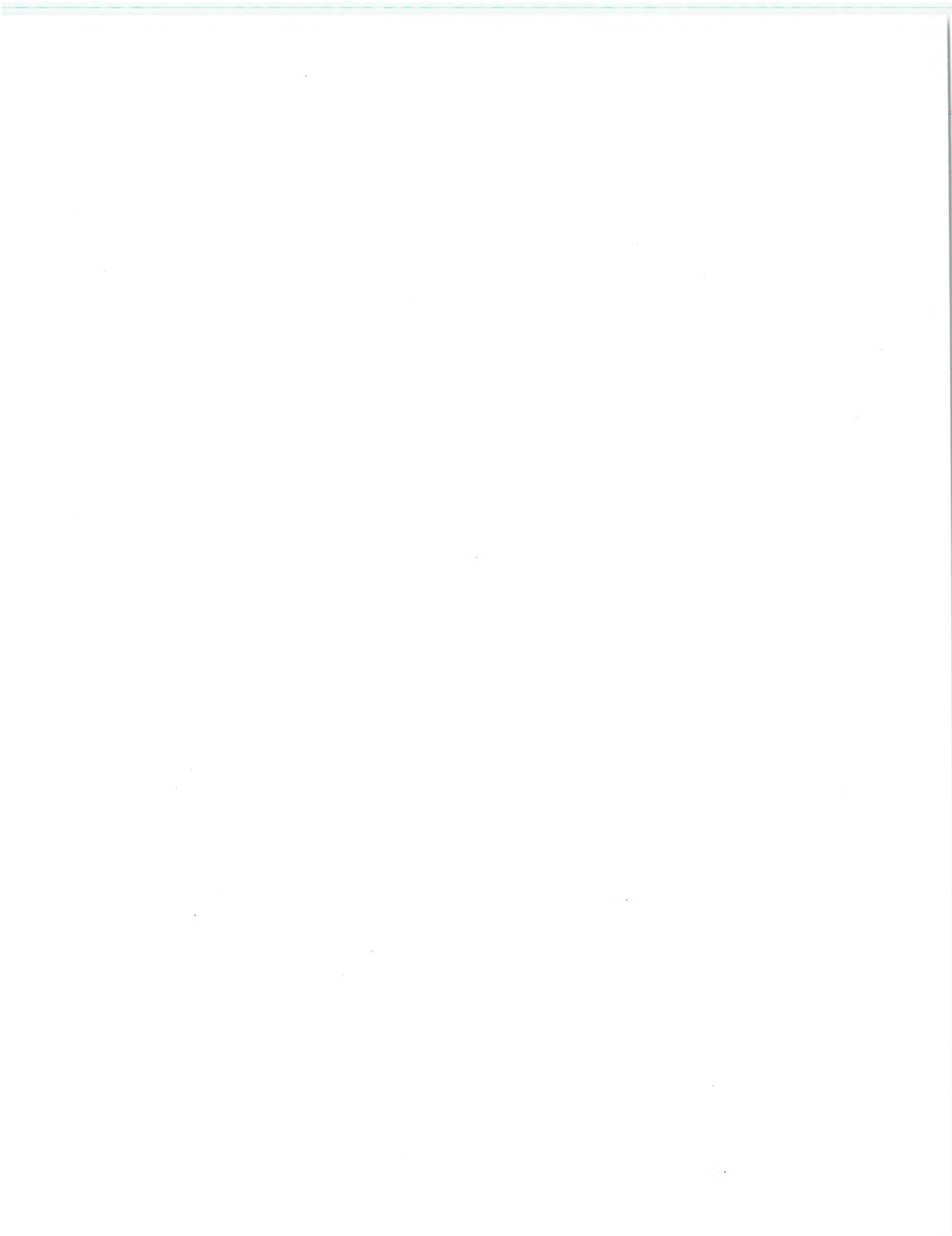
contributing/noncontributing items listed in Section 7, pages 5/6 as the rest of the numbers in the map do.

- Section 7, Resource No. 29 Campsite – is noted as “2 buildings”, but it is unclear whether these two buildings are counted as distinct contributing resources or one single resource.
- Descriptions of the resources in Section 7 are inconsistent in length and detail, and in many places unclear and seemingly incomplete – particularly with respect to the listed items that are labeled contributing resources. The descriptions for these resources becomes more inadequate as the list progresses.
- Alterations that occurred to the listed resources have not been adequately described in the application, or at times even mentioned at all.
- DEP is named at the “Department of Environmental Education” within Application (see page 3 Summary Paragraph).
- Properties have been altered and the differences between the original and current conditions/appearances is not clearly established or described in accordance with the applicable federal regulations.
- Section 3 of the Application is partially completed and should be completely left blank and filled in by State and National Register review agencies.

### **General Conclusion**

DEP, as an interested property owner whose land falls within the Proposed District, hereby submits these Nomination Application comments for review and consideration by New York State Board of Historic Preservation, the New York State Historic Preservation Officer, the National Park Service and the Keeper of the National Register of Historic Places, as applicable, for their respective use and consideration while reviewing Applicant’s Nomination Application and determining the eligibility of the Proposed District for listing in the National and/or State Registers. Based on the reasons set forth above, DEP does not believe the Proposed District is eligible for listing at this time in either the State or the National Register. Should any of the reviewing person(s) or agencies wish to discuss or clarify DEP’s position(s), you may contact:

Casey McCormack,  
Assistant Counsel,  
DEP Bureau of Legal Affairs  
(718) 595 6503





**EXHIBIT "A"**  
**Boundary Maps & Site Plan**



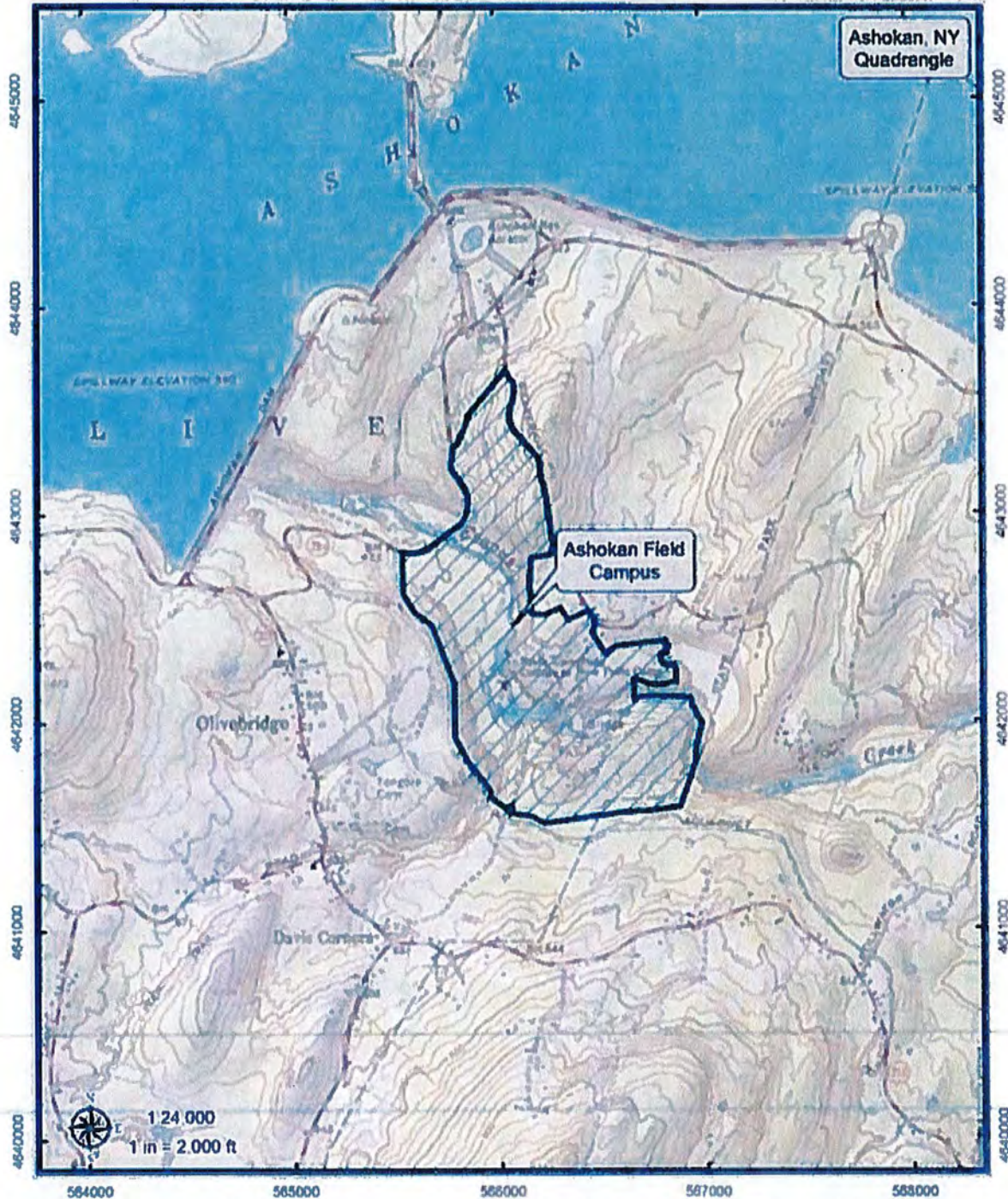


Ashokan Field Campus Historic District **DRAFT**  
Name of Property

Ulster, New York  
County and State

Ashokan Field Campus  
Olive Bridge, Ulster Co., NY

477 Beaverkill Road  
Olive Bridge, NY 12461

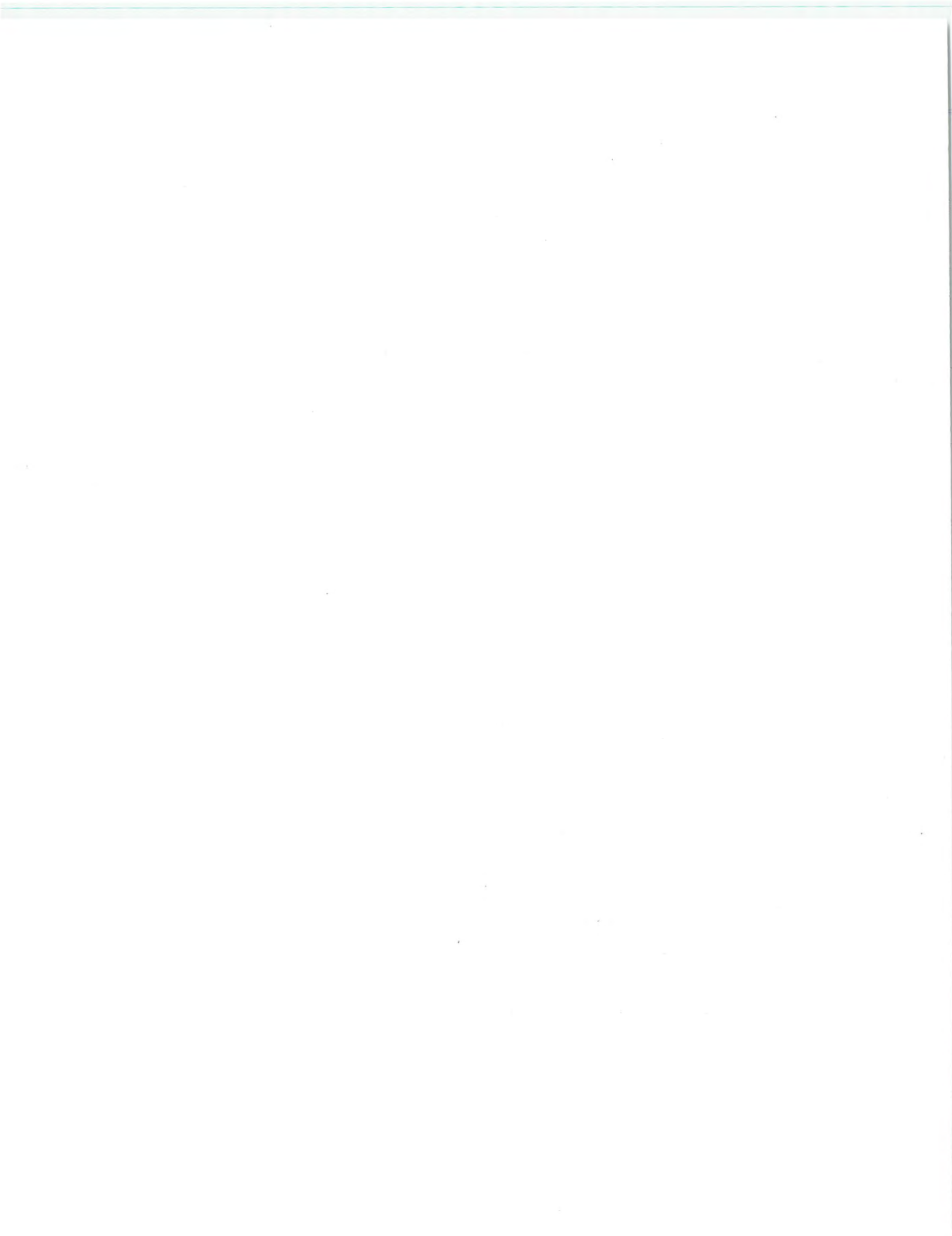


Coordinate System: NAD 1983 UTM Zone 18N  
Projection: Transverse Mercator  
Datum: North American 1983  
Units: Meter

0 650 1,300 2,600 Feet



Parks, Recreation  
and Historic Preservation  
Division for Historic Preservation



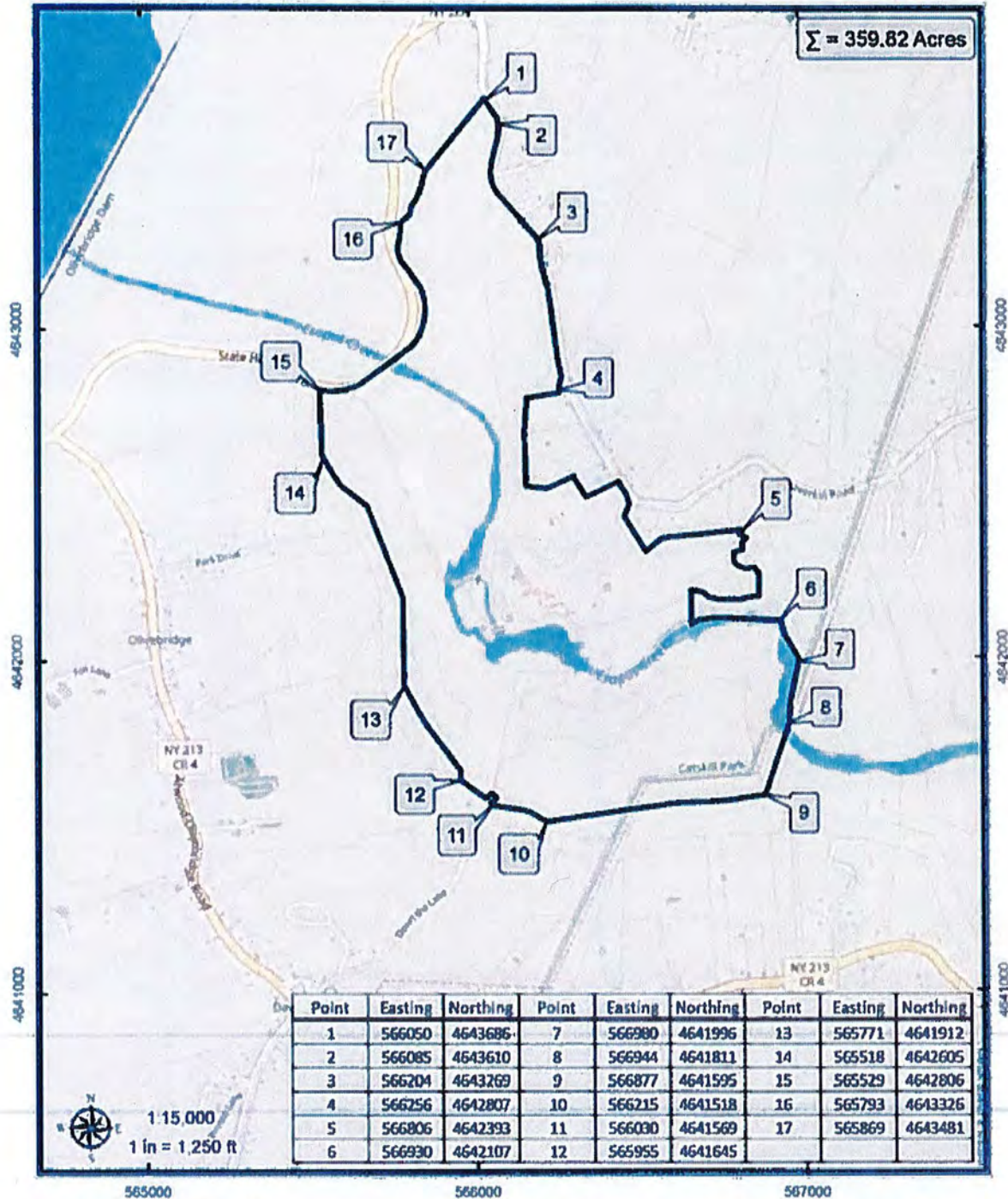


Ashokan Field Campus Historic District **DRAFT**  
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 Olive Bridge, NY 12461



Coordinates System: NAD 1983 UTM Zone 18N  
 Projection: Transverse Mercator  
 Datum: North American 1983  
 Units: Meter

0 405 810 1,620 Feet



Parks, Recreation  
 and Historic Preservation  
 Division for Historic Preservation



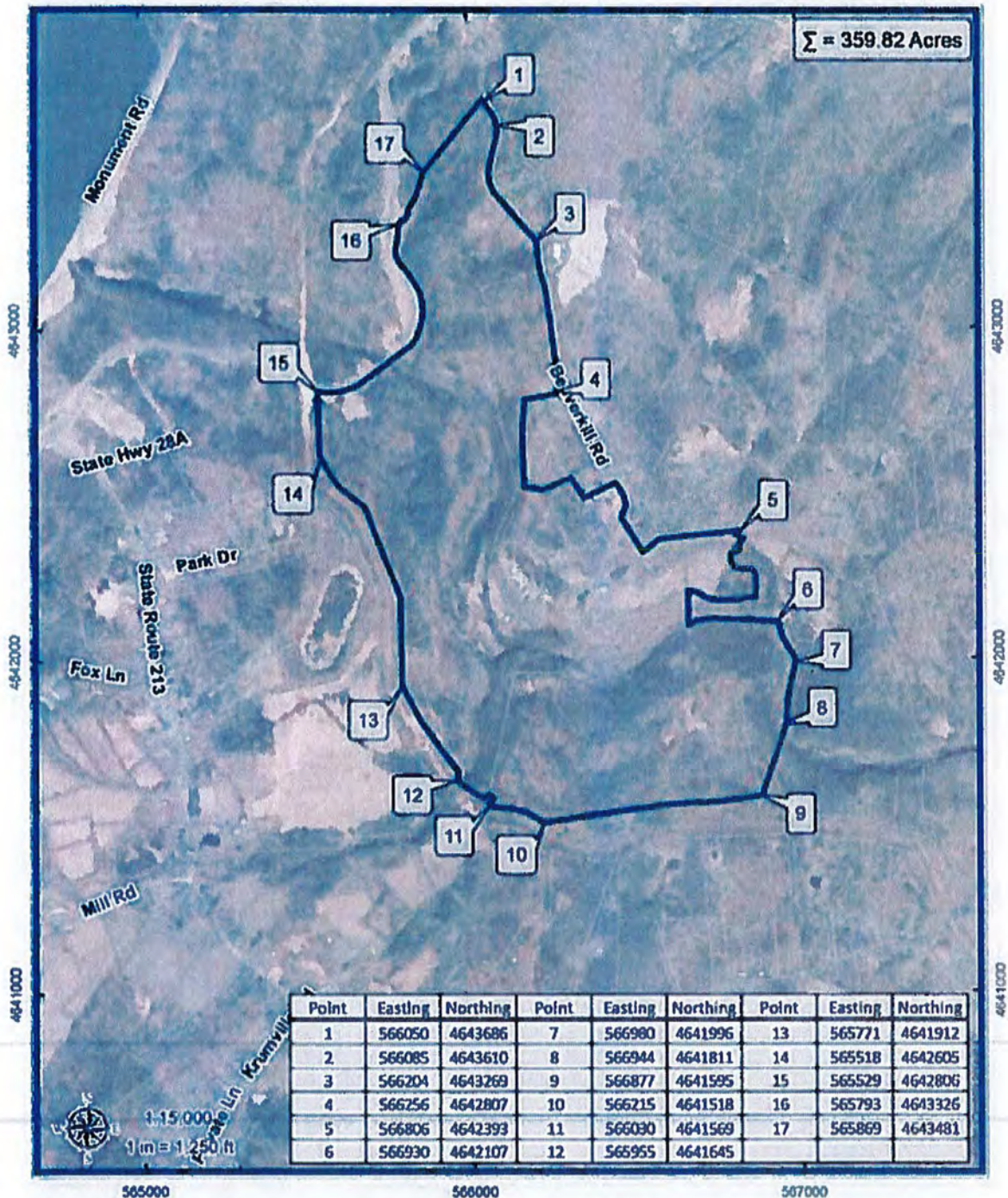


Ashokan Field Campus Historic District **DRAFT**  
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 Units: Meter

0 405 810 1,620 Feet



NEW YORK STATE  
 Parks, Recreation  
 and Historic Preservation  
 Division for Historic Preservation





**Ashokan Field Campus Historic District** **DRAFT**  
Name of Property

**Ulster, New York**  
County and State

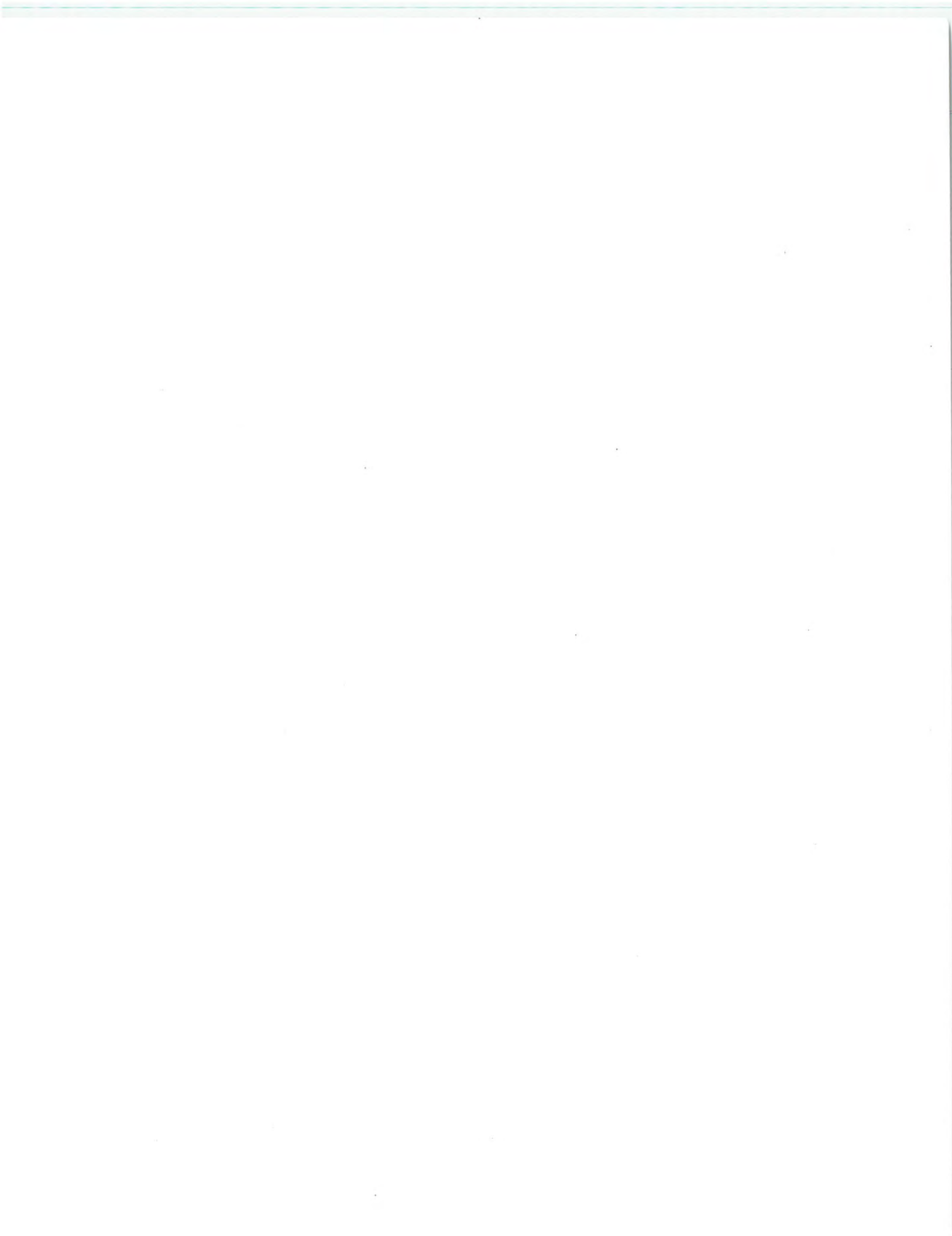


Ashokan Field Campus Historic District Site Plan





**EXHIBIT "B"**  
**"Ashokan Field Campus Historic District Photo Key"**



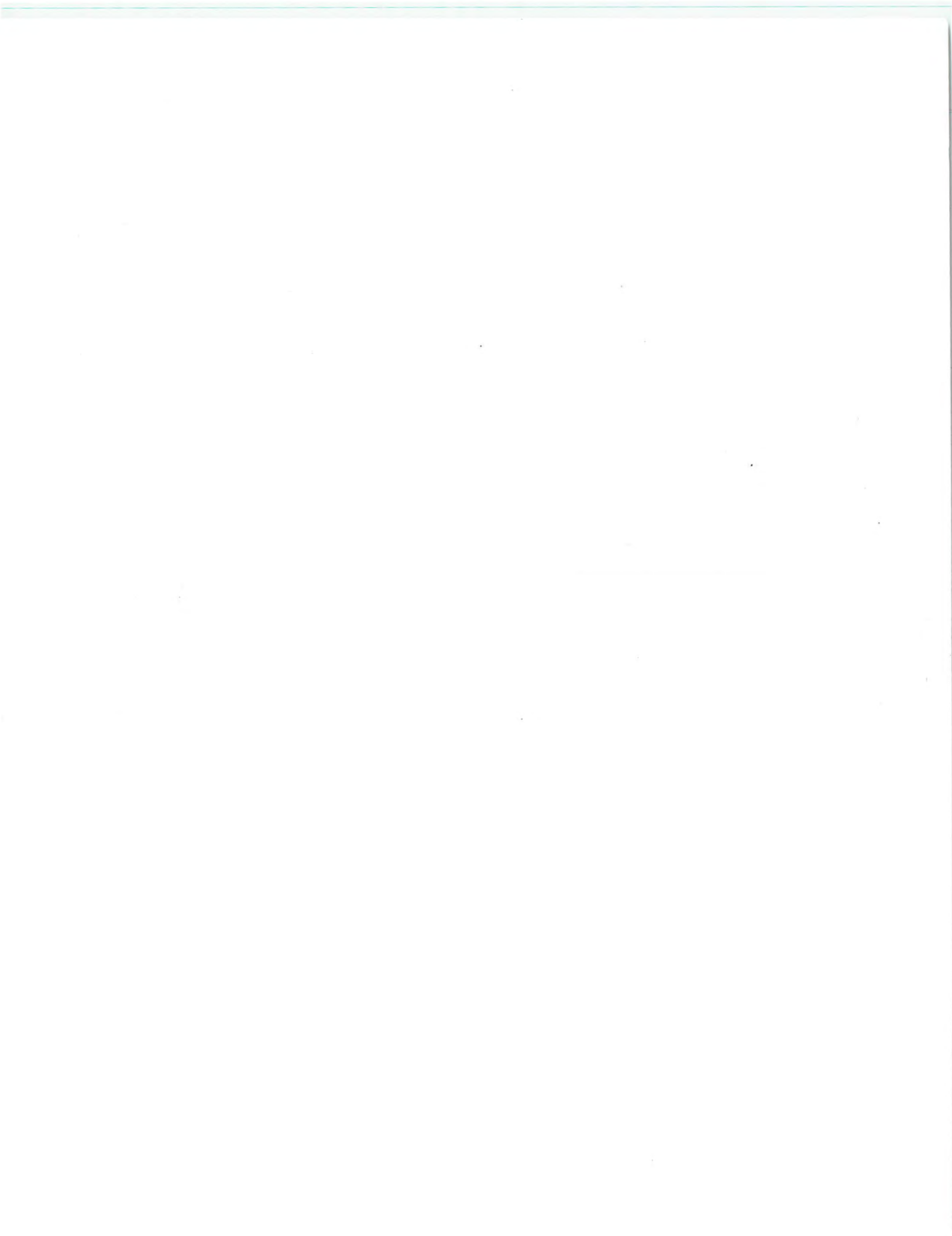


**Ashokan Field Campus Historic District DRAFT**  
Name of Property

**Ulster, New York**  
County and State

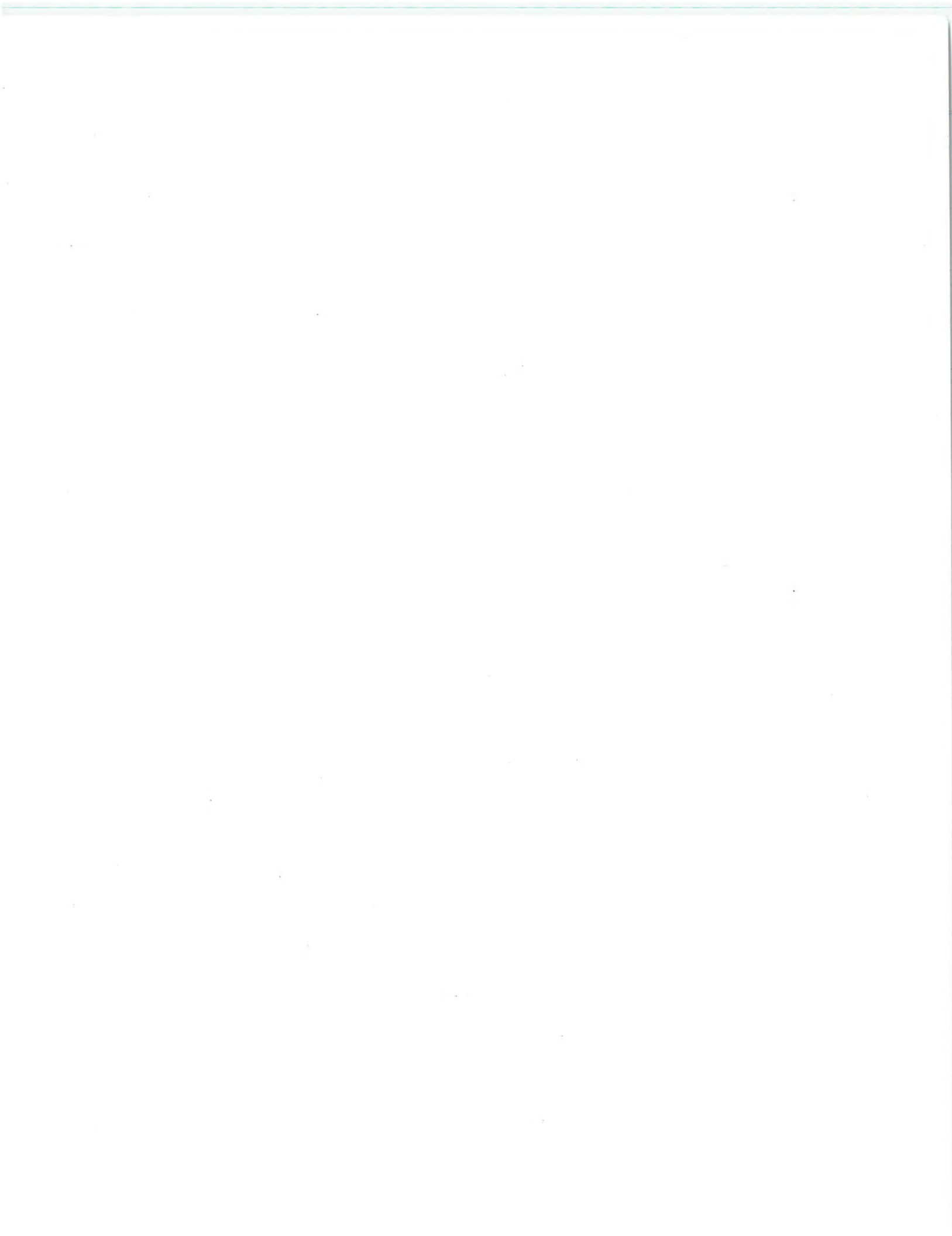


Ashokan Field Campus Historic District Photo Key

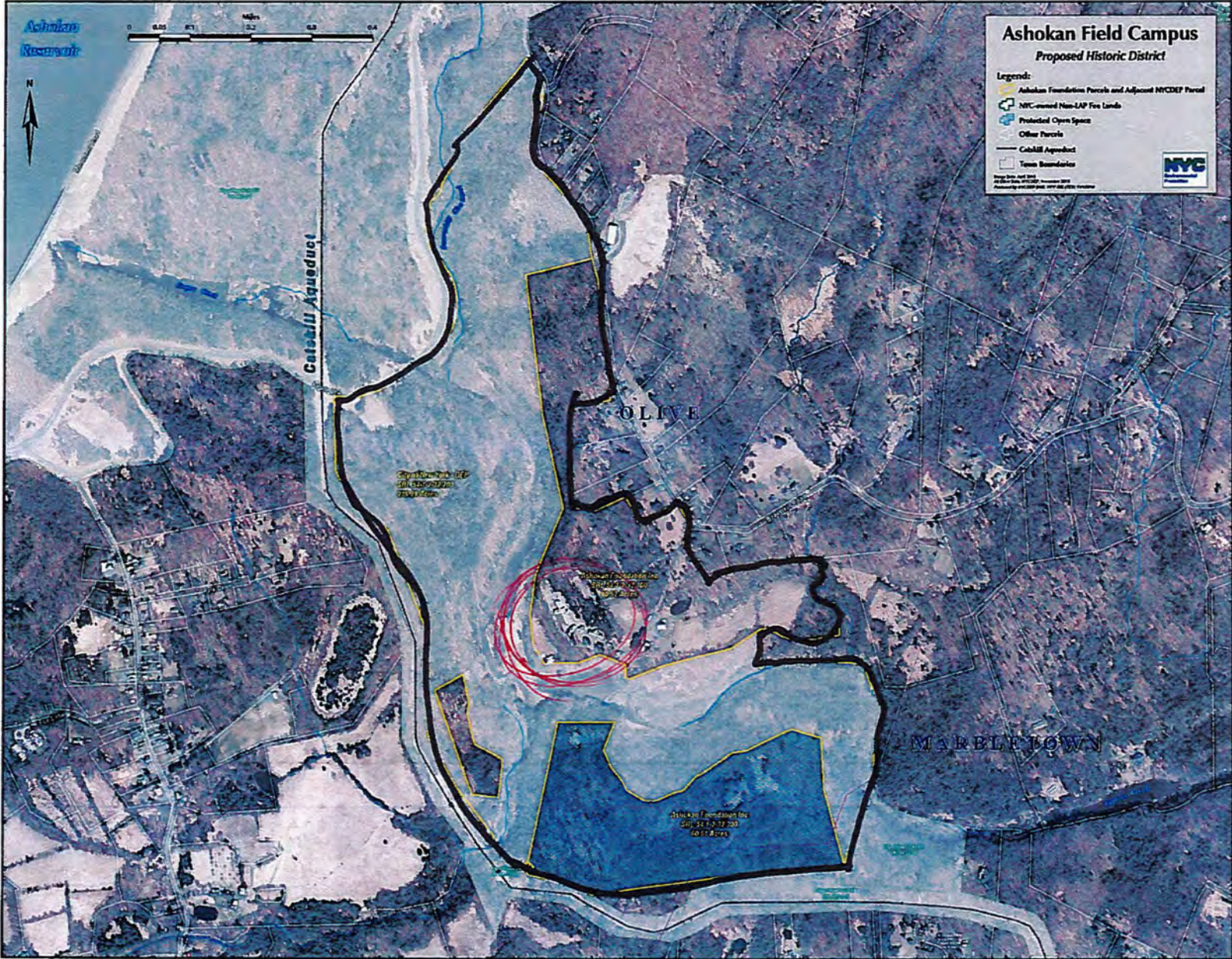




**EXHIBIT "C"**  
**DEP Aerial GIS Map**







Ashokan  
Reservoir

0 0.25 0.5 1.0 1.5 2.0 Miles



Catskill Aqueduct

OLIVE

MARBLETOWN

**Ashokan Field Campus  
Proposed Historic District**

**Legend:**

- Ashokan Foundation Parcels and Adjacent NYCDEP Parcel
- NYC-owned Non-LAP Fee Lands
- Protected Open Space
- Other Parcels
- Catskill Aqueduct
- Town Boundaries

NYC

Map Date: April 2015  
NYCDEP File: 04-2015-00000-000  
Proprietor: www.nyc.gov, www.nycdepr.com

Ashokan Foundation Inc.  
147-150 107th St.  
Marbletown, NY 12528

Ashokan Foundation Inc.  
147-150 107th St.  
Marbletown, NY 12528

Ashokan Foundation Inc.  
147-150 107th St.  
Marbletown, NY 12528

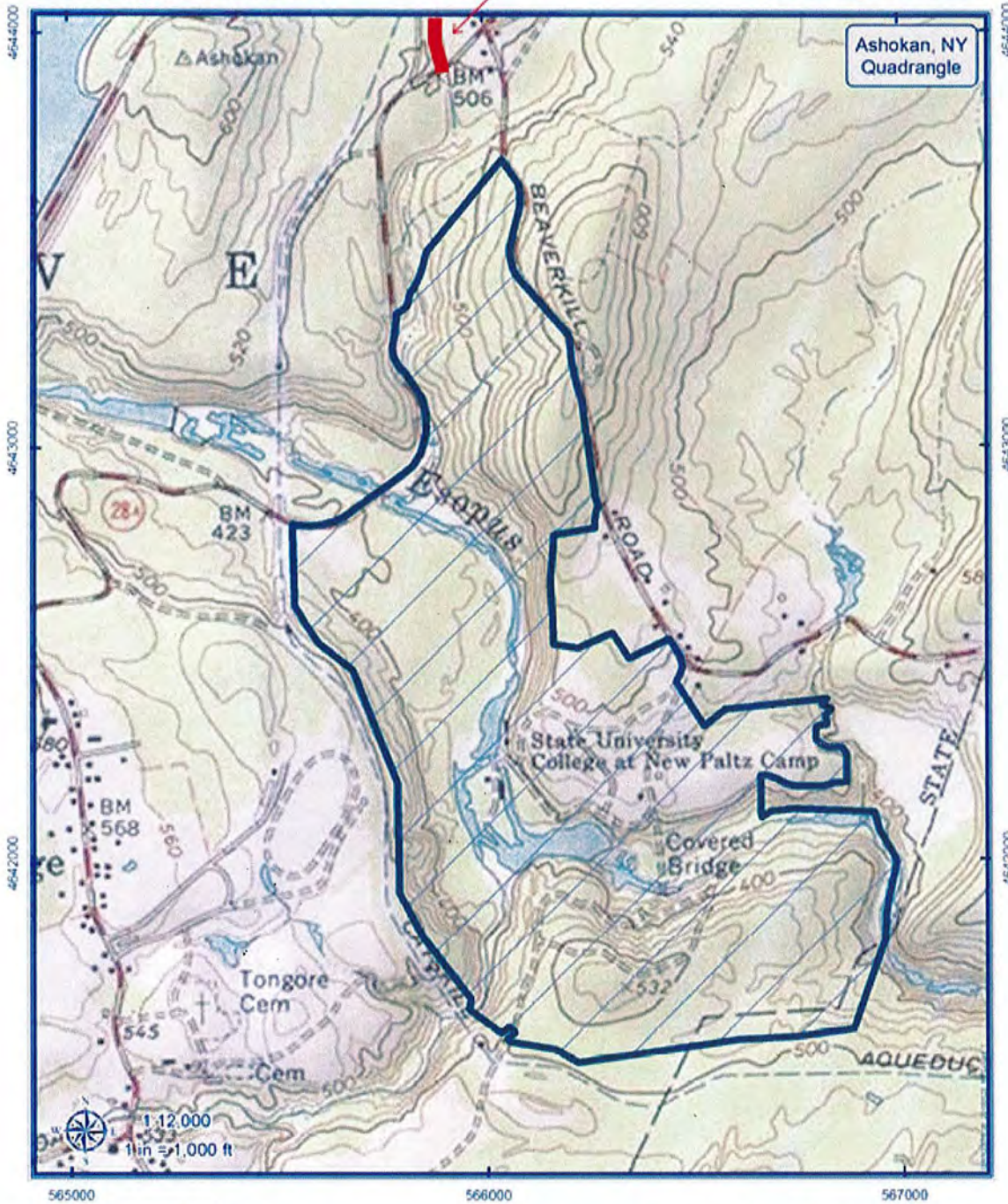




Ashokan Field Campus  
Olive Bridge, Ulster Co., NY

477 Beaverkill Road  
Olive Bridge, NY 12461

Concrete Release Channel



Coordinate System NAD 1983 UTM Zone 18N  
Projection Transverse Mercator  
Datum North American 1983  
Units Meter



On Feb 6, 2019, at 3:01 PM, LaFrank, Kathleen (PARKS)  
<[Kathleen.LaFrank@parks.ny.gov](mailto:Kathleen.LaFrank@parks.ny.gov)> wrote:

<image001.gif>







**Parks, Recreation  
and Historic Preservation**

**ANDREW M. CUOMO**  
Governor

**ERIK KULLESEID**  
Acting Commissioner



8 February 2019

Alexis Abernathy  
National Park Service  
National Register of Historic Places

Mail Stop 7228

1849 C Street NW  
Washington DC 20240

Re: National Register Nomination  
Ashokan Field Campus Historic District  
Olive Bridge Vicinity, Ulster County

Dear Ms. Abernathy:

I am pleased to submit the following nomination, on disc, to be considered for listing by the Keeper of the National Register:

Ashokan Field Campus Historic District, Ulster County (4 owners, 1 objection by a municipal entity)

The Keeper of the National Register will be receiving a letter and comments regarding the adequacy of the nomination and the significance of the district from one of the owners – New York City. Therefore, I am submitting copies of all letters, comments, and other relevant material to you with the nomination so that you will have a complete file when you review the submission.

The district includes the land of four different owners. Three of them are private property owners, all of whom support the district (one is the sponsor and we spoke to the other private owners by phone after official notification). The fourth parcel is owned by New York City under the jurisdiction of its Department of Environmental Protection (DEP), which has submitted the objection (8 November 2018, enclosure 1). The New York State Historic Preservation Office (SHPO) informed DEP that only private property owners may object to listing on the National Register. DEP also challenged the substance of the nomination (8 November 2018, enclosure 2).

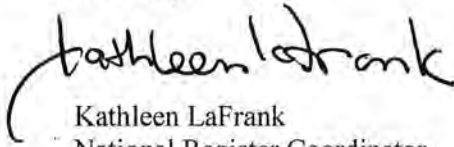
DEP's initial letter and comments were provided to the State Review Board (SRB) before its meeting, along with a memo prepared by SHPO staff (27 November 2018, enclosure 3) responding to each of the points made by DEP and three letters of support (enclosures 4-6). All of this material was carefully considered by the board before it voted unanimously to recommend the district for nomination on 6 December 2018.

In addition to the originally submitted material, DEP has provided a new letter (22 January 2019, enclosure 7), which it will submit to NPS, stating its concern with the ability to manage the Catskill water system and requesting that the nomination boundary be modified to exclude its land. In the new letter DEP mentions and describes the Ashokan Release Channel, a historic feature associated with the Ashokan Reservoir. Although both the reservoir and the release channel may be historic properties associated with the history and development of the New York City Water System, neither one is associated with the Ashokan Field Campus Historic District and neither one is located within the boundary of the

district proposed for nomination. An additional copy of the district boundary map on which the location of the Ashokan Release Chanel has been indicated has also been provided for your reference (6 February 2019, enclosure 8)

The Ashokan Field Campus Historic District is a large and complex district representing multiple historic contexts and many layers of use over more than two centuries. The SHPO believes that this nomination has been fully supported by thorough research and documentation and that the boundary has been appropriately evaluated and justified. Please feel free to call me at 518.268.2165 if you have any questions.

Sincerely:

A handwritten signature in black ink that reads "Kathleen LaFrank". The signature is written in a cursive style with a large, sweeping initial "K" that loops around the first few letters.

Kathleen LaFrank  
National Register Coordinator  
New York State Historic Preservation Office