

Statement re McGordon House before Planning Board , 4/12/23

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The State Environmental Quality Review process, SEQR for short, is extremely clear in distinguishing the size of an impact from the size of the property under review.¹ In other words, with respect to the proposed demolition of McGordon House, the fact that the property is just under an acre does not mean that the impact of demolition is small.

Demolition is probably the greatest land disturbance that can take place. It also impacts - not *may* impact, but *does* impact - cultural resources, ecology, and community character. Its impacts extend far beyond the property itself in terms of the waste generated and its disposal. All of these are important in environmental review.

I direct your attention to two such considerations. One is Archaeological Significance (Questions 12a and b). The property is contiguous with the Village of Aurora/Wells College Historic District. That gives significance to the building itself; at one hundred and twenty-five years old it is comparable to many contributing structures in the rest of the historic district. For 12b, it is important to understand what the State Historic Preservation Office map of archaeologically sensitive areas means. This map is developed based on *published archaeological studies*: it reveals only archaeological sites that are *currently* known. That this particular lot is not under a shaded circle on the CRIS map does not indicate that no archaeologically significant site is there; the fact that it is surrounded by shaded circles indicates that its probability of being archaeologically significant is very, very high. This can be assessed by a Phase I archaeological study.²

Let me add a cultural note. Many of the surrounding known sites are associated with Cayuga occupancy. The point of assessing local sites before disturbance - demolition and/or building - is not to find artifacts; the point is that if artifacts are found, the site has high cultural significance to the Cayuga and further disturbance should be as little as possible until there is consultation. Minimizing further disturbance might require *changing the plan of use*. Unfortunately, at this point, alternate uses have not and cannot be explored because no independent review is possible. You can address that need.

The second issue has to do with Question 15, Ecological Sensitivity. You have available a resource of unusual depth and thoroughness: an ecological survey of this very property carried out in 2017 by Erin Weber. To have this available and not to use it would be negligent in the extreme. It is exactly geared to the SEQR questions. Please do not make the mistake of thinking that the adjacent land that it also covers is irrelevant because it is not within the property lines. The adjacent areas are relevant precisely because they are adjacent; that is how ecology works. In addition, the author is available to consult with you.

What these factors at least, in addition to others, mean for you is that this project - even its demolition phase alone - requires a Full Environmental Impact Statement. I urge you to require one.

¹ SEQR Handbook, 4th Edn, 2020

² can be performed by the Public Archaeology team from SUNY Binghamton