



**Parks, Recreation
and Historic Preservation**

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Acting Commissioner

June 24, 2019

Mr. Jason Paananen
Director of Environmental Affairs
City of Buffalo
65 Niagara Square
Buffalo, NY 14202
(via email)

Re: DHCR
A.D. Price Courts Demolition & New Residential Development
373 Spring Street Buffalo, Erie County
16PR08068

Dear Mr. Paananen:

As you know, the NY State Historic Preservation Office had been reviewing this proposed redevelopment project under Section 106 of the National Historic Preservation Act.

Our last contact for this undertaking dates to July 13, 2017 and the receipt of an alternatives analysis prepared by kta Preservation Specialists for Bridges Development, Inc. (June 2017) Our office responded by letter dated August 31, 2017 accepting the report's findings.

With the passage of two years since this exchange and no progress on the project, the NYSHPO believes that an updated Section 106 review will be warranted if and when this project resumes. As such, we are rescinding our letter of August 31, 2017.

If you have any questions regarding our comments, I can be contacted at (518) 268-2166 or john.bonafide@parks.ny.gov.

Sincerely,

John A. Bonafide
Director,
Technical Preservation Services Bureau
Agency Historic Preservation Officer

cc: Jaime Loichinger, ACHP *(via email)*
Brian Sarma, Esq., Norstar *(via email)*
Linda Goodman, Norstar *(via email)*
R. Daniel Mackay, NY Deputy SHPO *(via email)*

att: Ltr. NYSHPO to J. Paananen, August 31, 2017



Parks, Recreation and Historic Preservation

ANDREW M. CUOMO
Governor

ROSE HARVEY
Commissioner

August 31, 2017

Jason Paananen
Director of Environmental Affairs
City of Buffalo
65 Niagara Square
Buffalo, NY 14202
(via email)

Re: DHCR
A.D. Price Courts Demolition & New Residential Development, 373 Spring Street
Buffalo, Erie County
16PR08068

Dear Mr. Paananen:

Thank you for your ongoing consultation with our office regarding this undertaking. We continue to review material relating to this activity in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/Cultural resources.

As noted in our letter dated December 2, 2016, Willert Park Courts was previously determined eligible for listing on the National Register of Historic Places for its association with New Deal era federal public housing program under the United States Housing Authority. It is also one of the first federal public housing projects developed specifically for the African-American community. Lastly, it is architecturally and artistically important for its Modernist design, which incorporated bas relief sculpture executed for the project by noted sculptors Robert Crombach and Herbert Ambellan.

In our previous letter we recommended that alternatives that might avoid or minimize the potential adverse effects associated with this undertaking be explored. Last month our office received the document titled: *A.D. Price Courts: Alternatives Analysis* (kta preservation specialists, June 2017) in response to our request.

The assessment focused on three alternatives, which included 1) Restoration of the complex, 2) Demolition of the entire complex and new construction, and 3) Retention and rehabilitation of the Administration Building and demolition and new construction on the remainder of the site. The report identifies Alternative 3 as the preferred option.

There is no question that the preferred alternative identified by this office would be the rehabilitation of the entire complex. However, we also understand the need to create modern, efficient and livable housing at this site. In reviewing the submitted report, we noted that the existing units all fall just under the HCR minimum unit size and well below the maximum unit square footage. We also noted that the floor-to-ceiling heights range between 7' 5" to 7' 9," which are quite low by modern standards. Rehabilitations would require the redesign of existing

floor plans to increase living space by merging units, although this would not remedy the low ceiling heights. Original wall finishes would need to be removed as part of individual unit expansions and to allow for modern utility installations. Non-historic windows and exterior doors would also be replaced.

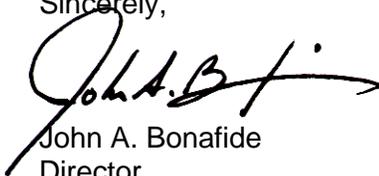
The completed rehabilitation project would certainly save the restrained Art Deco style building exteriors and site plan, but would significantly alter the interior floor plans and finishes.

Based on these factors, our office concurs with report's selection of Alternative 3. Under this option the Administration Building (Building J) would be retained and rehabilitated while the remainder of the complex would be demolished for new smaller house-like residential units. It is also our understanding that under this option all sculptures will be preserved and reintroduced into the new neighborhood's landscape.

At this point in the Section 106 process we would suggest that the consulting parties begin the development of a Memorandum of Agreement to establish appropriate mitigation measures for the loss of the historic facility. Stipulations should include a comprehensive documentation program for the buildings, a preservation plan of all art-work and an appropriate level of on-site educational material to document the significance of the A.D. Price complex in New York State history.

If I can be of any further assistance, please do not hesitate to contact me at (518) 268-2166 or john.bonafide@parks.ny.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Bonafide", with a long horizontal flourish extending to the right.

John A. Bonafide
Director,
Technical Preservation Services Bureau
Agency Historic Preservation Officer

cc: Kerry Traynor, ktp *(via email)*