



***Environmental and Planning Consultants***

440 Park Avenue South  
7th Floor  
New York, NY 10016  
tel: 212 696-0670  
fax: 212 213-3191  
[www.akrf.com](http://www.akrf.com)

October 19, 2012

Anthony Opalka  
New York State Office of Parks, Recreation and Historic Preservation  
Pebbles Island Resource Center  
P.O. Box 189  
Waterford, NY 12188-0189

**Re: EPT Concord Resort, Town of Thompson, Sullivan County, New York  
12PR02447**

Dear Mr. Opalka:

As you know, EPT Concord II, LLC (referred to as “EPT” or the “Applicant”) proposes to develop a master planned destination resort community (referred to as the “Proposed Project”) on approximately 1,583 acres of land that it owns in the Town of Thompson in Sullivan County, New York (the “Project Site”). The Proposed Project would require approvals from the Town of Thompson Planning Board, permits from the New York State Department of Health (Sewer System Extension Permit), the United States Army Corps of Engineers (Nationwide or Individual Wetland Permit), and a number of permits from the New York State Department of Environmental Conservation.

As part of the proposed plan, EPT proposes to modify existing, and construct new, access roads from NYS Route 17 (see Figure 1).

An Area of Potential Effect (APE) for historic architectural resources has been identified as the area within approximately 400 feet of the proposed and reconfigured roadways (see Figure 1)).<sup>1</sup> Within the APE, one previously identified historic architectural resource has been identified, the Osterhoudt-Towner Farm at 75 Cimarron Road (see Figure 1 for location in the APE). This property has previously been determined eligible for listing on the State/National Register of Historic Places (S/NR).

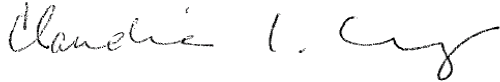
We are seeking an evaluation of National Register eligibility for one property located within the APE. This is the Frank House located at 71 Cimarron Road. Enclosed is a Historic Resources Inventory Form prepared for the property as part of a previous and separate project in 2005, which you had forwarded to me earlier. The form describes the property as not eligible for listing on the S/NR. I also enclose photographs of the property, which show the property in its current 2012 condition (see Figures 2-4).

---

<sup>1</sup> Due to the presence of NYS Route 17, a four-lane highway that serves as a physical and visual barrier between areas north and south of it, the APE for roadway elements north of NYS Route 17 does not extend south of NYS Route 17.

We look forward to receiving the eligibility determination for the property at 71 Cimarron Road at your earliest possible convenience. Please do not hesitate to contact me at 646-388-9745 if you have any questions or require further information.

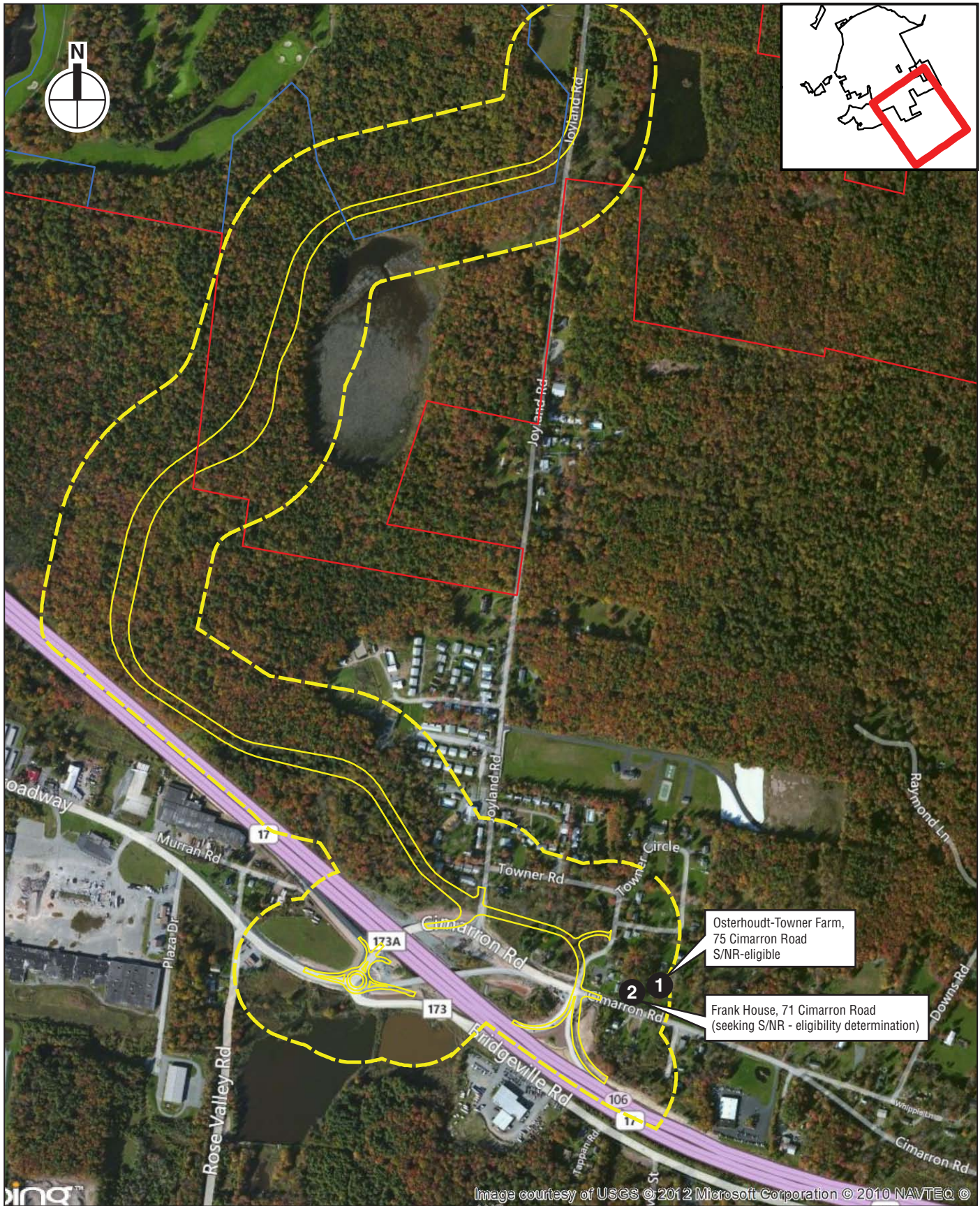
Sincerely,

A handwritten signature in black ink, appearing to read "Claudia L. Cooney". The signature is written in a cursive, flowing style.

Claudia Cooney  
Vice President

Enclosures

cc: Nicole Emmons, Hart Howerton  
Chris Robbins, Peter Feroe, AKRF, Inc.



- EPT Concord Resort Boundary
- Phase 1 Boundary
- Approximate Entry Road
- 400' Buffer Area

0 1000 2000 FEET  
SCALE

Approximate Resort Entry Road Location -  
Historic Resources APE  
**Figure 1**

**Figure 2**  
71 Cimarron Road  
Town of Thompson  
Sullivan County, NY



View of the south (Cimarron Road) façade.



View northwest, including the east façade.

**Figure 3**  
71 Cimarron Road  
Town of Thompson  
Sullivan County, NY



Detail of the collapsing porch roof.



View northeast, including the west façade.

**Figure 4**  
71 Cimarron Road  
Town of Thompson  
Sullivan County, NY



Rear (north) façade.



South (front) façade of associated garage at the rear of the property.



# HISTORIC RESOURCE INVENTORY FORM

NYS OFFICE OF PARKS, RECREATION  
& HISTORIC PRESERVATION  
P.O. BOX 189, WATERFORD, NY 12188  
(518) 237-8643

OFFICE USE ONLY

USN:

## IDENTIFICATION

Property name(if any) Frank House  
Address or Street Location 71 Cimarron Road  
County Sullivan Town/City Thompson Village/Hamlet: Monticello  
Owner Jonathan J. Frank Address 425 Valley View Road, Englewood, NJ 33442  
Original use Residence Current use Residence  
Architect/Builder, if known \_\_\_\_\_ Date of construction, if known ca. 1922

## DESCRIPTION

Materials -- please check those materials that are visible

Exterior Walls:	<input checked="" type="checkbox"/> wood clapboard	<input type="checkbox"/> wood shingle	<input type="checkbox"/> vertical boards	<input type="checkbox"/> plywood
	<input type="checkbox"/> stone	<input type="checkbox"/> brick	<input type="checkbox"/> poured concrete	<input type="checkbox"/> concrete block
	<input type="checkbox"/> vinyl siding	<input type="checkbox"/> aluminum siding	<input type="checkbox"/> cement-asbestos	<input type="checkbox"/> other: _____
Roof:	<input checked="" type="checkbox"/> asphalt, shingle	<input type="checkbox"/> asphalt, roll	<input type="checkbox"/> wood shingle	<input type="checkbox"/> metal <input type="checkbox"/> slate
Foundation	<input checked="" type="checkbox"/> stone	<input type="checkbox"/> brick	<input type="checkbox"/> poured concrete	<input type="checkbox"/> concrete block

Other materials and their location: brick chimney, wood windows

Alterations, if known: \_\_\_\_\_ Date: \_\_\_\_\_

Condition:  excellent  good  fair  deteriorated

## Photos

Provide several clear, original photographs of the property proposed for nomination. Submitted views should represent the property as a whole. For buildings or structures, this includes exterior and interior views, general setting, outbuildings and landscape features. Color prints are acceptable for initial submissions.

Please staple one photograph providing a complete view of the structure or property to the front of this sheet. Additional views should be submitted in a separate envelope or stapled to a continuation sheet.

## Maps

Attach a printed or drawn locational map indicating the location of the property in relationship to streets, intersections or other widely recognized features so that the property can be accurately positioned. Show a north arrow. Include a scale or estimate distances where possible.

Prepared by: Gerald M. Kuncio/Laura C. Ricketts address Skelly and Loy, Inc., 2500 Eldo Road, Suite 2, Monroeville, PA 15146

Telephone: (412) 856-1676 email gkuncio@skellyloy.com Date October 2005

(See Reverse)

N.Y. Route 17 (S.H. 5457) Interchange 106 Reconstruction  
Historic Resource Inventory Form  
Continuation Sheet

Photograph 1. Frank House



Facade and east elevation, facing northwest.



N.Y. Route 17 (S.H. 5457) Interchange 106 Reconstruction  
Historic Resource Inventory Form  
Continuation Sheet

Photograph 2. Frank House



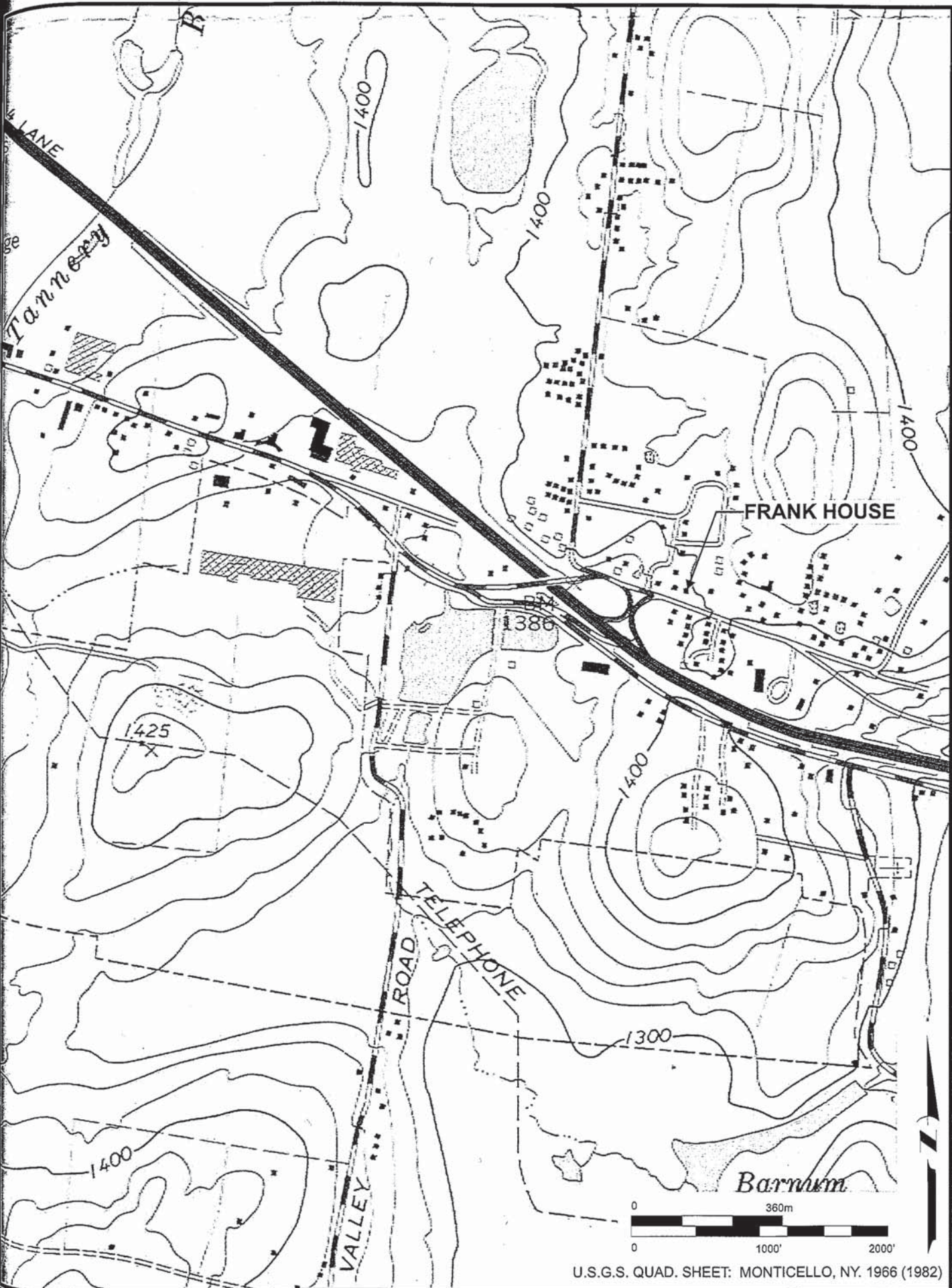
Rear and east elevations, facing southwest.

N.Y. Route 17 (S.H. 5457) Interchange 106 Reconstruction  
Historic Resource Inventory Form  
Continuation Sheet

Photograph 3. Frank House



South elevation of the garage, facing northwest.



U.S.G.S. QUAD. SHEET: MONTICELLO, NY. 1966 (1982)

**N.Y. Route 17 (S.H. 5457) Interchange 106 Reconstruction  
Historic Resource Inventory Form  
Continuation Sheet**

**Narrative Description of Property:** The Frank House is located on the north side of New York (N.Y.) Route 17 (the Quickway) in the Town of Thompson, Sullivan County. It is just east of the existing exit ramp for northbound traffic. The road fronting the house, now called Cimarron Road, is old N.Y. Route 17, also known as State Highway (S.H.) 5457. The area is primarily residential in character, but there are also bungalow colonies in the vicinity, many still in active use, primarily by the Hasidic Jewish community.

The Frank House sits on a long narrow lot that stretches from Cimarron Road north to a wooded area which includes a garage outbuilding. The house is a rather modest version of the American Foursquare style with its two-and-a-half-story blocky mass capped with a hipped roof of replacement asphalt shingles. It measures three-bays by three-bays with a front central hipped dormer that is fitted with louvers for attic ventilation. It is covered with clapboard siding, which is detailed with corner boards and red paint. A cut stone foundation that has been skim-coated with concrete provides a footing for the house, and a brick chimney rises from its center.

The front (south) façade is organized symmetrically with two second story windows located below the central dormer. The three-over-one sash windows, here as elsewhere, are original, although they are now protected by aluminum storm windows. The first story features a central entry between two paired sash windows. A full-width porch with a half-hipped roof (also replaced shingles) adorns the front elevation. The porch is supported by four slim posts across the front, with fixed multi-paned windows added to the sides. The solid porch railing is sided with the same clapboards as the house.

The side elevations are each organized with three original three-over-one sash windows on the second floor and one matching sash window and one shallow bay window on the first floor. The rear elevation has two second story windows above a two-bay, shed roof addition. The addition originally consisted of one small room and one small open porch, but the porch has since been enclosed as a sunroom, with vertical siding and fixed, four-pane windows.

The roof surfaces have been replaced, and the front and back porches have been altered. Except for the porches, all of the doors and windows appear to be original.

To the north of the house lies a two-story garage that is faced with the same red clapboard siding and corner boards and capped with a hipped roof. At the left, the front (south) façade of the garage has two hinged wood doors with window panels that open to access the vehicle bay. At the right, it has a tall, two-over-two fixed pane window, and on the second story it has a centered, three-over-three fixed pane window. The doors and windows are trimmed with simple wood moldings that have been painted white. While the roof is covered with

**N.Y. Route 17 (S.H. 5457) Interchange 106 Reconstruction  
Historic Resource Inventory Form  
Continuation Sheet**

replacement shingles, the rest of the garage including the doors and windows, appears to be original.

The Frank House has integrity. Despite the replacement of the roofing material, the minor alteration of the porches, and the poor condition of the house, it maintains its original sense of design, workmanship, materials, setting, location, and association.

**Narrative Description of Significance:** The Frank House dates to ca. 1922. The construction date is consistent with the land use record of the area, the deed history for the property, and the house's architectural style. Historically, the land on which the house sits was part of the holdings of the Towner family. In 1919, following the death of Hiram Towner, the family began subdividing the family's holdings, particularly those that fronted on Cimarron and Joyland roads (Sullivan County Deeds 1919:493). In 1922, H. Eugene and Elna Towner sold this lot to Hazel E. Crawford (Sullivan County Deeds 1922:280). Over the ensuing 25 years, the parcels had six owners. In 1947, the lot was purchased by Jacob and Helen Frank (Sullivan County Deeds 1947:358). Their children still own the property.

The Frank House is a modest example of an American Foursquare style house. Generally considered to be a vernacular variant of the Prairie style, the American Foursquare was popularized in pattern books and spread from the Midwest throughout the country between roughly 1900 and 1925. Despite the relatively short duration of its popularity, the house type is ubiquitous and well-preserved (McAlester and McAlester 1990:439-443).

The Frank House is not eligible for listing in the National Register of Historic Places (NRHP). There is no evidence it is associated with an event or person who made a significant contribution to history, as is necessary to be significant under NRHP Criteria A and B. The single-family home does not have important associations with noteworthy themes in Sullivan County history, such as tourism or agriculture. Architecturally, the house does not embody distinctive characteristics of a type, period, or method of construction, represent the work of a master, or possess high artistic value. Consequently, it is not significant under NRHP Criterion C. Because of the extremely high numbers of Prairie style houses constructed during the first quarter of the twentieth century, only those examples that best convey the architectural style should be considered to be eligible for NRHP listing. The Frank House does not rise to that level. Rather, it is a modest and undistinguished example of what one architectural guide calls "the most common vernacular form" of the style (McAlester and McAlester 1990:439-443). It lacks basic, character-defining features of an American Foursquare style house.

**N.Y. Route 17 (S.H. 5457) Interchange 106 Reconstruction  
Historic Resource Inventory Form  
Continuation Sheet**

**References:**

McAlester, V., and L. McAlester

1990 *A Field Guide to American Houses*. Alfred A. Knopf, New York.

**Sullivan County Deeds**

1919 Flora A. Towner, Executrix of Hiram Towner to William Ingersoll. Deed Book 196, Page 493. On file, Sullivan County Clerk's Office, Sullivan County Government Center, Monticello, New York.

1922 H. Eugene and Elna Towner to Hazel E. Crawford. Deed Book 259, Page 280. On file, Sullivan County Clerk's Office, Sullivan County Government Center, Monticello, New York.

1947 Herbert V. and Antoinette Stanford to Jacob and Helen Frank. Deed Book 410, Page 358. On file, Sullivan County Clerk's Office, Sullivan County Government Center, Monticello, New York.



## New York State Office of Parks, Recreation and Historic Preservation

Historic Preservation Field Services Bureau • Peebles Island, PO Box 189, Waterford, New York 12188-0189

518-237-8643

www.nysparks.com

**Andrew M. Cuomo**  
Governor

**Rose Harvey**  
Commissioner

November 13, 2012

Claudia Cooney  
AKRF, Inc.  
440 Park Avenue South  
New York, NY 10016

RE: Corps  
EPT Concord Resort  
T/Thompson, Sullivan County  
12PR02447

Dear Ms. Cooney:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). We have begun to review the project in accordance with Section 106 of the National Historic Preservation Act of 1966 and relevant implementing regulations.

Based on the information submitted, it is the SHPO's opinion that the following property within the Area of Potential Effect DOES NOT meet the criteria for inclusion in the National Register of Historic Places:

The Frank House

Please refer to the Project Review number (PR) in any future correspondence regarding this project. If you have any questions, please call me at (518) 237-8643 x3278.

Sincerely,

Anthony Opalka  
Historic Preservation Program Analyst.







## New York State Office of Parks, Recreation and Historic Preservation

Historic Preservation Field Services Bureau • Peebles Island, PO Box 189, Waterford, New York 12188-0189

518-237-8643

www.nysparks.com

Andrew M. Cuomo  
Governor

Rose Harvey  
Commissioner

August 29, 2012

Anthony P. Cellini, Supervisor  
Town Board, Town of Thompson  
4052 Route 42  
Monticello, NY 12701

Re: **SEQRA**  
**EPT Concord Resort**  
**T/Thompson, Sullivan County**  
**12PR02447**

Dear Supervisor Cellini:

The Field Services Bureau of the Office of Parks, Recreation and Historic Preservation (OPRHP) has received information that was forwarded for the SEQRA process. We have had an opportunity to review the submitted Draft Generic Environmental Impact Statement. These comments are those of the Field Services Bureau and relate only to Historic/Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8) and its implementing regulations (6 NYCRR Part 617).

Our office has no further concerns regarding archeology and the project: the report identifies past work and what may be required for future project activity. Above grade historic resources have been identified in the area over a period of several years: the most recent identification was the Breezy Corners Bungalow Colony which was recently determined to be eligible for listing in the National Register of Historic Places. Under SEQRA our office can only issue unrestricted negative comments on National Register listed properties (none of the historic properties near the project site are National Register listed). With this understanding in mind, our office notes the project will not have substantial negative results upon historic resources under SEQRA. However, under either state Section 14.09 or federal Section 106 any demolition of an eligible property (e.g., the Breezy Corners building to allow road widening) will result in an adverse impact/effect upon the resource and involve an analysis of alternatives to the undertaking and an agreement for final project resolution. This will likely become an issue when the project gets closer to implementation.

If you have any questions regarding this letter or the project, please feel free to contact me. Ext. 3273.

Sincerely,

Kenneth Markunas  
Historic Sites Restoration Coordinator

Cc: Claudia Cooney, AKRF

