



Parks, Recreation and Historic Preservation

ANDREW M. CUOMO
Governor

ROSE HARVEY
Commissioner

February 20, 2018

Kate Maynard
Principal Planner
City of Saratoga Springs
474 Broadway
Saratoga Springs, NY 12866
(via email)

Re: SEQRA
Rip Van Dam Proposed Expansion/New Construction
353 Broadway, Saratoga Springs, Saratoga County
13PR02563

Dear Ms. Maynard:

I am writing to follow up our Agency's letters of November 20, 2017 and January 16, 2018 regarding the ongoing SEQRA review of this action. I have now had an opportunity to assess the revised plans submitted to this office and offer the following comments as an interested agency in this review.

First, let me restate that the project is located within the boundary of the Broadway Historic District, which is listed in the New York State and National Registers of Historic Places. The project site occupies a highly visible location at the southernmost entrance into the district.

As defined by the National Park Service: "A district derives its importance from being a unified entity, even though it is often composed of a wide variety of resources. The identity of a district results from the interrelationship of its resources, which can convey a visual sense of the overall historic environment or be an arrangement of historically or functionally related properties." (NPS Bulletin 15, Pg. 5).

The location of this project within a National Register district is a Type I action under SEQRA and should require a more thorough analysis of potential impacts to historic resources. While SEQRA does not establish specific types of impacts to historic properties we generally base our substantive comments on the guidance provided by Section 14.09 of New York State Parks, Recreation and Historic Preservation Law and its associated regulations (9 NYCRR Part 428).

Impacts that may adversely affect historic resources are defined generally by these regulations as those that 1) destroy or alter all or part of a historic resource, 2) isolate or alter a history property's environment, or 3) introduce visual, audible or atmospheric elements which are out of character with the historic property or alter its setting. (9 NYCRR Part 428.7(a))

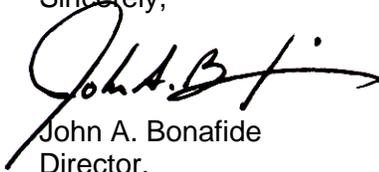
Using these regulations as guidance the introduction of a 62,000sf, six-story building at this visually significant location in the district will, as previously noted, adversely impact the district.

Even as redesigned, the monumental super block-like scale of the new complex will dwarf the surrounding district, which is composed primarily of three and four-story commercial buildings. The project alters the rhythm of the existing streetscape and introduces new construction that will impose, in our opinion, visual impacts that will clearly and demonstrably alter the setting and environment of the district's southern gateway.

We believe that our agency's comments are consistent with those we have provided in the past on this proposal. Our office appreciates the opportunity to provide additional comments on this action to your board and the SEQRA Lead Agency.

If additional information is needed or 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: Bradley Birge
Steve Rowland