



April 25, 2019

Joy Beasley
Keeper of the National Register of Historic Places National Park Service
1849 C Street NW
MS 7228
Washington, DC 20240

Re: Proposed Regulation Changes Governing National Register of Historic Places Designations

Dear Ms. Beasley:

On behalf of the Board of Directors of Historic Saranac Lake, I am writing to submit the following comment regarding the National Park Service's proposed changes to the rules governing listing on the National Register of Historic Places.

Historic Saranac Lake is an architectural preservation organization that captures and presents local history from our center at the Saranac Laboratory Museum. We are located in Saranac Lake, NY, a village of 5,000 people in the heart of the Adirondack Park of northern New York. Since 1980, we have worked to preserve the unique architecture of our community by securing the nomination of over 230 local properties to the National Register of Historic Places. The National Register has played an essential role in the preservation and revitalization of our community. We believe that the proposed NPS revisions undermine the intent and the impact of this valuable program. We strenuously object to the proposed rules changes for the following three reasons:

- 1) The proposed rules radically change the process for recognizing federal properties as historic places by allowing a federal agency to effectively block a historic property from being listed on the National Register. Earlier this year, Historic Saranac Lake completed a project to nominate an expansion of the downtown Berkeley Square Historic District. This project was supported by a grant from the Preservation League of New York State and completed with the assistance of our consultants at Adirondack Architectural Heritage. The historic district expansion includes as a contributing property the Saranac Lake U.S. Post Office, built in 1925. This proposed rule change threatens not only the listing of this historic building, but also throws into question the entire district nomination and threatens to make historic tax credits unavailable.
- 2) The proposed revision would allow large property owners to be given an outweighed ability to block nominations by counting the majority of the land area in addition to the current counting of one private owner, one vote. There is no statutory authority to make this change and any such change would place a near impossible burden on State Historic Preservation Officers. This proposed rule change throws into question the process for going forward with our current district expansion nomination, and it threatens the viability of future National Register historic districts.
- 3) The consequences of the proposed procedures have serious negative impacts on the intent of the National Historic Preservation Act. The Section 106 consultation process is key to consideration of federally owned historic resources in agency planning processes. Under the proposed rules, the federal agency, not the Keeper of the National Register, will determine whether a federal property is

worthy of consideration for protection under the NHPA. Also important is the right under the NHPA for any person or local government to appeal the failure of a nominating authority to nominate a property. To remove federal properties from an appeals process would be contrary to the law and would alter an existing process that is currently fair and open.

The rule as proposed in docket #NPS-2019-0001 would dramatically impact the ability of properties to be listed on the National Register of Historic Places. I strongly urge you to reconsider these changes.

Sincerely,

A handwritten signature in cursive script that reads "Amy Catania".

Amy Catania
Executive Director
Historic Saranac Lake

cc:
Congresswoman Elise Stefanik
U.S. Senator Chuck Schumer
U.S. Senator Kristin Gillibrand