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2021-2026



New York State  
Parks, Recreation and  
Historic Preservation

# The New York State Historic Preservation Plan

## Generic Environmental Impact Statement

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## SEQR NOTICE OF COMPLETION OF A FINAL GEIS

**Date of Notice:** December 8, 2021  
**Lead Agency:** New York State Office of Parks, Recreation and Historic Preservation (OPRHP)  
**Title of Action:** Adoption and Implementation of the State Historic Preservation Plan (2021-26)/GEIS  
**SEQR Status:** Type I  
**Location of Action:** Statewide

This Notice is issued pursuant to Part 617 of the implementing regulations pertaining to Article 8 (State Environmental Quality Review) of the Environmental Conservation Law.

The New York State Office of Parks, Recreation and Historic Preservation (OPRHP), as lead agency, has prepared a Final Generic Environmental Impact Statement (FGEIS) regarding the proposed action described below (State Historic Preservation Plan (2021-26)).

**Brief Project Description:** The State Historic Preservation Plan (SHPP) guides preservation efforts at the local, regional, and state levels. It serves as a blueprint for identifying and preserving New York's historic and cultural resources and is periodically updated to address current needs, issues, and opportunities. The SHPP details resources that have the potential to support preservation and community development efforts. The SHPP aims to further preservation activities by outlining a broad set of goals and objectives combined with specific strategies. Development of a State Historic Preservation Plan is a requirement by the National Park Service for continued receipt of federal Historic Preservation Fund grant monies.

Potential environmental impacts associated with adoption and implementation of the SHPP, as well as mitigation measures that could be taken to reduce potential impacts, are included as part of the SHPP which, in its entirety, constitutes a Final Generic Environmental Impact Statement. The Final SHPP/GEIS contains a comments and responses section to respond to comments received on the Draft SHPP/GEIS.

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**AVAILABILITY OF FGEIS:** Agencies and the public are afforded the opportunity to consider the FGEIS; this consideration period ends on December 18, 2021. Copies of the Final SHPP/GEIS are available for review at the office of the agency contact and the document can also be reviewed on OPRHP's website at:

<https://parks.ny.gov/inside-our-agency/master-plans.aspx>.

# Environmental Impacts

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## **State Environmental Quality Review (SEQR)**

New York's SEQR Act requires all state and local government agencies to consider environmental factors in agency decision-making processes and actions, including actions they have the discretion to approve, fund, or directly undertake. SEQR requires agencies to balance environmental impacts with social and economic factors when deciding to approve or undertake an "action." Agencies must assess the environmental impacts of actions that they propose, evaluate alternatives, develop methods for minimizing potential adverse impacts, and provide an opportunity for the public to participate in the planning process when proposals may have significant impacts.

When an action is determined to have the potential for at least one significant adverse environmental impact, development of an Environmental Impact Statement (EIS) is required. The SEQR process uses an EIS to examine ways to avoid or reduce adverse environmental impacts related to a proposed action, including an analysis of all reasonable alternatives to the action.

The action in this case is the adoption and implementation of a comprehensive statewide historic preservation plan, the 2021-26 New York State Historic Preservation Plan (2021-26 Plan). This Plan will guide preservation efforts statewide over the next five years. Its adoption and implementation have the potential for significant impacts on the environment. A Final Scoping Document for the SHPP was published on May 27, 2020.

Whereas the Plan will have "wide application," will influence "the range of future alternative policies or projects," and lead agencies are permitted to prepare a generic EIS (GEIS) for "the adoption of a comprehensive plan," the preparation of a GEIS was determined to be appropriate to assess the environmental impacts of the proposed action (6 NYCRR 617.10(a)). The Plan is more conceptual in nature than a site-specific EIS that addresses a proposed project.

## **Generic EIS**

This document constitutes the Plan and Final GEIS and discusses the potential impacts and mitigation of impacts associated with adoption and implementation of the 2021-26 Plan.

The Plan describes:

- The Proposed Action;
- The Purpose, Need, and Benefits of the Proposed Action;
- New York State's Historic and Cultural Resources Conditions Inventory;
- The Vision for Historic Preservation in New York State;
- Goals and Objectives for Implementation; and
- Implementation and Funding.

The GEIS presents a review of the state's comprehensive preservation plan in the context of potential environmental impacts and mitigation measures of implementation of the 2021-26 Plan. This section will also describe the Plan's cumulative impacts and its consistency with New York State Coastal Policies. Intended outcomes of the Plan are to improve preservation stewardship and protection, and to help realize the larger vision for preservation in New York State: that residents and visitors will be more aware of and appreciate the many narratives and cultural traditions that have shaped New York's natural and built environment; that they will understand the importance of preserving and interpreting the places where history happened; and that they will recognize the significant role New York and its people continue to play in the forming of America.

The GEIS is not intended to provide a comprehensive analysis of impacts of each program or project that may be undertaken pursuant to the 2021-26 Plan. It serves as a reference, providing a sound environmental planning base, setting forth the process for evaluation of future actions and related impacts. Evaluation and review processes are discussed in terms of ensuring that resource protection is given appropriate consideration during planning and implementation of programs and activities recommended by the Plan. A Draft Plan/GEIS was made available for public review and was the subject of a public meeting (webinar), in accordance with the public review process of the SEQR. Comments on the Draft Plan/GEIS have been incorporated and addressed in the Final Plan/GEIS as part of the SEQR record, prior to adoption of the 2021-26 Plan.

## **Environmental Setting**

The environmental setting for the Plan consists of the people and the natural, recreational, scenic, historic and cultural resources of New York State, as well as social and economic characteristics. The setting also includes the general public (residents and nonresidents) and preservation advocates and professionals.

Resource categories that are likely to be impacted from implementation of the 2021-26 Plan include archaeological, historic, and cultural resources and community character. These are addressed below.

## **Alternatives**

Choosing not to prepare this plan is not a viable option since the preparation and implementation of a statewide historic preservation plan by the State Historic Preservation Officer is mandated by the National Historic Preservation Act (16 U.S.C. 470)—and necessary for New York State to receive appropriations from the federal Historic Preservation Fund. The New York State Office of Parks, Recreation and Historic Preservation is the only state agency with the statutory responsibility to prepare the Plan.

In terms of implementation, not preparing the Plan would mean that there would be no statewide guidance based on current data of historical and cultural resources, and, if the State continued to use recommendations from the New York State Historic Preservation Plan for 2015-20, its implementation would not be responding to changing resource needs or based on updated goals and objectives. In addition, without proper identification of preservation needs, failure by the agency to implement the 2021-26 Plan may result in the loss of opportunities to strengthen preservation efforts across New York State. Without the guidance provided by updated goals and objectives, adverse impacts to the historical and cultural resource environment could occur. Moreover, without the focus and goals set by the 2021-26 Plan, opportunities for identifying, maintaining, and protecting cultural and historical resources could be hindered.

## **Environmental Impacts and Mitigation**

In this section, goals and objectives are briefly described and the implications as to potential environmental impacts are discussed. Where possible, general approaches that mitigate potential adverse impacts are identified.

## **Planning Process**

The planning process described in Chapter 3 assures that preservation planning in New York State considers environmental as well as human resources. Continually reevaluating assumptions, methods and objectives throughout the planning process helps assure that cultural, archaeological, and historic resources are protected when conditions change, or new information is available. The extensive outreach to the public and professionals in the field conducted during the planning process—a video presentation with feedback option, multiple questionnaires and surveys, personal interviews, and small group consultations—have provided comprehensive input into the development of the Plan’s goals and objectives. A major theme heard throughout this outreach process was ensuring that Inclusion, Diversity, Equity, and Access (IDEA) concerns were reflected not only in each topic but given a whole topic write-up to itself. This helped to drive goals and objectives development. Another theme that was heard, and proved central to plan development, was ensuring that any stakeholder (government official, preservation professional, museum volunteer, etc.) could pick up the Plan document and see the role they could play in resource protection/preservation.

Adequate information and analysis, coordination, and public participation are key to the implementation of actions that protect resources and enhance preservation resource stewardship. The planning process considers resource and user impacts and emphasizes the best use of available resources and knowledge. Public participation in the planning process ensures a balance of interests in plan formulation.

## **Goals and Objectives**

To maximize the social and economic benefits associated with preservation, while minimizing adverse impacts to the resources of the state, it is critical that while planning for preservation activities and programming, consideration be given to the entire set of the Plan topics, goals, and objectives. A sensitive, nuanced, approach is necessary to achieve the vision for preservation in New York State. Focusing on only a portion of the goals, or giving undue weight to certain objectives, can result in substantial reduction in the quantity of potential preservation services (and the associated benefits), or in the quality of the state's cultural, archaeological, and historic resources, and blur the larger vision.

The 2021-26 Plan's topics, goals, and objectives are comprehensive and consistent with the state's desire to protect and preserve its cultural, archaeological, and historic resources and environment. They also provide enjoyable educational and interpretive opportunities, while enhancing the public's safety and welfare. Resource protection is balanced with other goals to achieve optimal levels of preservation services and programs.

Each time the State Historic Preservation Plan is revisited, suggestions for new strategies and improvements are sought from the Division for Historic Preservation, the State Board for Historic Preservation, statewide nonprofits, public and private museums and cultural centers, cooperating agencies, community groups and the public, through the public participation process. This ensures that the goals and objectives continue to be responsive to local, regional, and state preservation demands and needs. Since the Plan is a broad framework within which more detailed planning must take place, it is not possible to definitively identify potential adverse impacts. It is, consequently, infeasible to suggest specific mitigation measures.

The state's review processes, including SEQRA, ensure that due consideration is given to protection of its cultural and historic heritage. These processes, by which more detailed plans and projects are developed and evaluated, should serve to minimize, if not eliminate, potential adverse impacts associated with the provision of preservation services and programs. This Plan contains topics and goals that reflect major issues and provide a larger context for enhancing existing preservation programs and activities across the state. The 2021-26 Plan topics are woven throughout the goals and objectives, assuring focus on them as an overarching framework.

**TOPIC:** Inclusion, Diversity, Equity, and Access (IDEA)

**GOAL:** Ensure activities dedicated to the preservation of cultural heritage recognize and champion the responsibility to uphold and progress the principles of Inclusion, Diversity, Equity, and Access.

Many of the objectives in this goal are administrative and programmatic tasks, such as increasing diversity in hiring of staff, reviewing documents for inaccurate or missing information, offering programs and materials in multiple languages, and evaluating grant scoring criteria to support IDEA initiatives. By the very nature of these actions, there will be no direct adverse environmental impacts. There will likely be benefits to the historic preservation community and resources by ensuring that a wider diversity of the public and stakeholders are involved with, and have access to, cultural heritage programs. The more active/interactive objectives include collaborating with diverse individuals and groups; working with marginalized communities; reducing barriers and ensuring equitable access to heritage resources; and coordinating with inadequately represented groups to develop educational presentations, cultural demonstrations, and other opportunities for cross-cultural exchange. These are also expected to have great benefits to the preservation community by incorporating a larger and more diverse representation of communities and histories. This may also help to protect and expand documentation of physical historic and cultural resources and enhance meaningful connections to these resources, strengthening the sense of place and community character.

**TOPIC:** Survey, Designation and Protection

**GOAL (A):** Assist in planning for the continued use and preservation of heritage resources for the benefit of future New Yorkers.

**GOAL (B):** Guide survey and designation efforts into a more collaborative dynamic process that ensures the stories of all people (past and present) are told and that cultural heritage, both tangible and intangible, is recognized.

Many of the objectives in these goals are administrative and programmatic tasks, such as encouraging municipalities and organizations to undertake historic resources surveys, undertaking surveys in flood-prone areas, assessing climate change challenges, submitting historic resource information to online databases, and identifying places and history that are

important to marginalized communities. By the very nature of these actions, there will be no direct adverse environmental impacts. There will likely be indirect benefits to the historic preservation community, local communities, and resources as a result of these types of actions. By gathering more data and better understanding existing resources, collaborating, managing resource information via online databases, and expanding the breadth of input from communities, analysis and planning for the future of heritage resources can be done in a more comprehensive, diverse, and inclusive manner.

**TOPIC:** Economic Development and Recovery

**GOAL:** Integrate historic preservation and cultural resource management efforts with economic development practices and policies to ensure resources are recognized as indispensable attributes of a competitive, sustainable, and equitable future.

Promoting awareness of, expanding training on, and strengthening preservation incentives can go a long way to increasing preservation efforts at all levels, including private landowners and businessowners, local community groups, municipalities and more. Expanding financial incentives for preservation of agricultural buildings and having municipalities adopt property tax incentives that benefit property owners who make substantial investments in historic resources could benefit both urban and rural communities. Reinvesting in existing built resources is generally considered a benefit to the environment.

Creating new programming, services, and place-based recreation opportunities at historic sites or within legacy communities can help bolster interest from new audiences and potentially create new jobs and sources of revenue. Any potential physical disturbance in the form of developing new recreational facilities at these sites that may impact cultural resources will likely require consultation with the New York State Division for Historic Preservation (DHP). Projects should provide for the long-term protection of the cultural resources and any natural resources that may be impacted. This is accomplished through site specific review and coordination with appropriate resource and permitting agencies.

**TOPIC:** Environmental Sustainability

**GOAL:** Improve understanding of the effects of environmental change on cultural resources and implement energy-conscious practices in the stewardship and management of resources to promote just environmental and public health outcomes.

Some of the objectives under this goal focus on initiatives to educate and provide training on sustainability approaches to preservation projects, methods for reducing energy consumption, and other skills for sustainable preservation, restoration, and rehabilitation of historic structures. Other objectives include promoting energy audits of historic structures, installing on-site renewable energy sources, and reducing demolition waste in landfills by promoting repair, salvage, and reuse of historic materials. Implementing such actions will increase the sustainability of historic resources and the communities in which they are located. Reducing our gas and carbon footprint can have a positive impact on the natural environment, bring greater sustainability to our cultural resources, and ideally result in cost-savings. Reduce, reuse, and recycle will continue to be a mantra for all communities and types of resources to provide greater environmental integrity and sustainability.

Integrating sustainability measures into policy mechanisms, such as funding opportunities and tax assessment relief, and into building codes, to establish performance-based efficiency standards for historic structures, will more consistently and thoroughly ensure energy efficiencies are assimilated into preservation projects.

**TOPIC:** Disaster Planning and Resilience

**GOAL:** Foster resiliency by creating the capacity to successfully respond to and mitigate the impacts of geological, weather-related, hydrological, fire-related, biological, and other disasters through the creation of a hazard mitigation, preparedness, recovery, and resiliency plan that considers impacts to historic and cultural resources.

Objectives listed under this goal are largely administrative and programmatic in nature—conducting risk assessments and surveys, publicizing risk assessment tools, preparing hazard

mitigation plans, incentivizing protection measures, and promoting funding opportunities for adaptation measures—that will not pose any direct adverse environmental impacts. To the contrary, these actions will directly and indirectly help promote preparedness and resiliency in structures, services, and programming in light of potential disasters. A more connected and coordinated approach for development of recovery plans, and post-disaster assessment and treatment of damaged resources, with nonprofits, municipalities, counties, tribes, and other heritage-keepers for response efforts at local, regional, and state levels can only serve better to protect the hardscape resources and the communities they are in.

Training and public outreach and education to promote protection and appropriate treatment of heritage resources, raising awareness about mitigation, response, and recovery tactics, and publicizing resiliency and recovery plans will strengthen the resolve and abilities of communities to respond to and engage in these efforts.

**TOPIC:** Local Preservation

**GOAL:** Empower and strengthen the process of preservation at the municipal, county, and regional levels by encouraging and offering expanded historic preservation services, activities, and collaboration.

Some of the objectives under this goal speak to reducing barriers, increasing diversity in staffing, increasing workshop and training opportunities to reach an expanded audience, and undertaking community-wide surveys and condition reports. Enhancing awareness and understanding about preservation is expected to provide further protection to cultural resources, services, and programs. As people gain an appreciation for their local resources, they are more likely to be engaged and advocate for these resources. Adopting and incorporating preservation laws into local governments and policies will further empower the preservation process and ingrain it in local community undertakings.

**TOPIC:** Partnerships

**GOAL (A):** Seek new community partnerships by forming relationships with individuals and groups to encourage resource awareness, appreciation, and protection in areas where preservation initiatives are lacking.

**GOAL (B):** Strengthen existing partnerships to encourage best practices in the field and support colleagues in growing and strengthening their local, regional, and statewide relationships and networks.

Strengthening and expanding public and professional networks and partnerships in the preservation field is key to building long-term support for historic and cultural resources in communities. New training and educational opportunities provided in a variety of forms and platforms will encourage more meaningful and in-depth communication and coordination among various groups and stakeholders. Strengthening relationships with community groups whose work seeks to keep preservation relevant to sustainability issues (e. g., climate change, social justice) will provide more resilient communities, programs, and physical historic resources and enhance community character.

**TOPIC:** Public Outreach and Education

**GOAL:** Expand public outreach and education initiatives to strengthen, empower, and create meaningful dialogue between traditional preservation partners (preservation advocates, community stakeholders, and units of government) and the public to advance the shared values of the community at large.

Breaking down barriers to information and bringing awareness about preservation to underrepresented and/or previously excluded communities will allow for more diverse public engagement. This may result in new insights into, and resources for, preservation activities at a local community level. This encourages gaining new advocates and new stories to share, thereby strengthening the preservation community. A concerted effort to share information about preservation tools and best practices to more audiences, providing education workshops and training opportunities, and promoting participation in preservation conferences and workshops expands the diversity of the audience and can strengthen the

preservation community and local communities' skills necessary for sustainable preservation, restoration, and rehabilitation of historic structures. As more people become aware of the importance and relevance of historic and cultural resources and more enriched exchanges in dialogue occur, this will help ensure a more common preservation ethic and practice into the future.

### **Coastal Zone Management Program Consistency**

For a state agency action in the coastal area, an EIS must address the action's consistency with the applicable Coastal Management Program (CMP) state coastal policies or, when the action is in an approved local waterfront revitalization program area (LWRP), with the local program policies. As the Plan is a statewide program document, policies are considered on a statewide level.

The 2021-26 Plan's focus is on historic preservation efforts and will guide decision making, influence historic preservation policy in state and local governments, and empower local communities, organizations, and individuals to action for the next five years. The vision, goals, and objectives of the Plan promote and are consistent with the state's coastal policy regarding historic resources: protect, enhance, and restore structures, districts, areas, or sites that are of significance in the history, architecture, archaeology, or culture of the state, its communities, or the nation.

Many of the listed objectives are administrative and programmatic in nature, while others are more active and interactive between various groups of stakeholders, the public, communities, and government entities, involving programs, services, funding opportunities, and training. The variety of topics addressed in, and the focus of, the Plan allow for beneficial changes to heritage communities and resources throughout the state and are flexible in order to allow individuals, organizations, and communities to tailor the activities to their area's resources and needs.

A few objectives involve the potential for ground disturbance or physical changes to historic resources. The state's review processes, including SEQR, ensure that due consideration is given to protection of its natural and cultural heritage. As projects are planned and designed on the

local level, they are subject to SEQR and will be evaluated to minimize, if not eliminate, potential adverse impacts associated with development or rehabilitation of facilities.

## **Implementation**

To fully implement the objectives outlined in the Plan, local, regional, and state level entities must develop strategies, translating topics, goals, and objectives into the delivery of preservation programs, policies, and services for the protection of cultural, archaeological, and historic resources. In a state as large as New York, priorities will vary across geographic and political boundaries, and the DHP can help prioritization processes. Implementation vehicles include private, local, state, and federal funding, such as the allocation of funds for preservation, education, and interpretation projects.

The partnership philosophy is also key to implementation and is supported throughout the Plan, particularly relating to improving cooperation and coordination in resource stewardship, protection, and promotion between all levels of government and the private sector. These partnerships play an increasingly important role in leveraging existing resources and talents, identifying new opportunities for preservation, and continuing thoughtful celebration and stewardship of the state's cultural heritage.

Inclusion, Diversity, Equity & Access (IDEA) must be an overarching goal in resource stewardship, planning, and celebration. As noted in multiple Plan objectives, implementation must respond to the need to reach marginalized communities and insufficiently documented groups and remove access barriers and ensure equitable access to heritage resources. Multiple goals include objectives regarding the need for grant-makers to add scoring criteria that reflect increased emphasis on IDEA initiatives.

When specific projects are undertaken, funded, or approved by state or local agencies pursuant to the Plan, they are subject to SEQR if the projects meet certain thresholds as defined by SEQR regulations. Evaluation of some of these specific proposals, including the many administrative and programmatic actions, will result in determinations that they will not have significant adverse impacts on the environment as a result of undertaking the actions. Those proposals that may have significant adverse impacts on the environment will require the preparation of an EIS. Under SEQR, the EIS process ensures that an action to be undertaken will avoid or minimize adverse environmental impacts to the maximum extent practicable.

Through SEQR and other existing review mechanisms, such as environmental permit processes, consideration of environmental factors is a part of all plans or specific actions undertaken to implement the SHPP.

### **Cumulative Impacts**

The topics, goals, and objectives defined in the 2021-26 Plan will have a positive impact on the environment. The primary effect of the Plan is to promote the topics, goals, and objectives identified within the Plan. While the Plan is focused on many attributes of the built environment—buildings, structures, and cultivated landscapes—it also demonstrates a respect for natural resource stewardship—such as the Environmental Sustainability goal: Improve understanding of the effects of environmental change on cultural resources and implement energy-conscious practices in the stewardship and management of resources to promote just environmental and public health outcomes—recognizing that healthy ecosystems mean healthy, vibrant cultural communities.

The cumulative effects of applying the goals and objectives of the 2021-26 Plan in a systematic manner will be substantially beneficial. Existing preservation services to the public will be maintained and likely enhanced and expanded, while protection of cultural, archaeological, and historic resources will be ensured. Perhaps one of the most important cumulative effects of the SHPP is also the least tangible. The implementation of preservation, education, and interpretation programs recommended in the Plan substantially enhances the physical and psychological wellbeing—the quality of life—of the state’s residents and visitors.

Enhancing the quality and quantity of preservation services and programs has substantial beneficial effects on economic activity. Implementation of efficiently designed plans for community preservation and restoration often contributes to the attractiveness of a municipality for investment by businesses. Thus, the facilities and programs impacted by the SHPP are an important adjunct to factors leading to economic recovery and development. In New York State, these existing and established centers generally stabilize existing investments and services.

The goals stated in the Plan will not result in any significant increase in energy consumption associated with preservation activities. On the contrary, several of the objectives and initiatives

defined in the Plan will promote reduced energy consumption in the provision of programs, services, and in the physical activities associated with preservation work.

Since the 2021-26 Plan is a general plan, identification of program-specific or site-specific adverse impacts, including those which are unavoidable, will be accomplished during future planning and environmental review of specific programs and projects at a more local or regional level.

Applying the goals and objectives of the Plan to the development of preservation services and programs requires a commitment of planning resources. Resources are committed to preservation activities through a variety of funding sources (see Chapter 5: *Implementation and Funding*), including state or federal legislative action, gift, grants, fundraising, or other opportunities. The 2021-26 Plan can help to determine the priority for use of these committed resources. Implementation of the objectives defined in the Plan will result in irreversible and irretrievable commitments of time, funds, and energy resources; but, overall, the benefits of preservation, stewardship, and providing interpretive and educational opportunities outweigh these commitments.

## Comments and Responses

The Draft State Historic Preservation Plan/DGEIS, and associated appendices, was published on September 8, 2021 on the OPRHP website and announced broadly with a press release. The Plan's release initiated a public comment period of 40 days.

Public comments on the Draft Plan were collected through traditional and electronic mail and during a public meeting for the Draft Plan, which was held virtually on September 28, 2021. During the comment period, the Draft Plan/DGEIS received two comments of general support. These comments, and the response to each comment, are summarized below.

**Category:** Inclusion, Diversity, Equity and Access (IDEA)

**Comment:** General support was expressed for the Plan's emphasis on inclusion and the value of the document to advocates looking to promote diversity and equity initiatives within their surrounding community.

**Response:** Thank you for your comment. The IDEA topic received a large response during the data collection portion of the planning process. The Planning Team spent significant time thinking about the topic and endeavored to have significant engagement with stakeholders throughout the Plan's development. Of particular note in this outreach effort are the personal interviews with groups and individuals identified as having perspectives or interests historically underrepresented in preservation work and advocacy. The input from these contributors helped to ensure that IDEA issues were meaningfully addressed in the Plan's goals and objectives.

**Category:** Collaboration and Cooperation Among Decisionmakers

**Comment:** General support was expressed for the Plan as a comprehensive model to be promulgated across government as it 1) encourages robust interaction between state agencies, local governments, and communities; and 2) promotes respect for the complex interplay between the built environment, the context of historic resources, and future development goals.

**Response:** Thank you for your comment. This document will not only be printed and shared with governmental leadership—including the State Legislature and municipalities—but published and promoted widely online in hopes that every reader can see a role for themselves in the implementation process.



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