# PUBLIC COMMENTS ON
# "NHPA at 50: CHALLENGES & OPPORTUNITIES"
# (as of March 7, 2016)

***California Cultural Resources Preservation Alliance***

January 16, 2016

Advisory Council on Historic Preservation

RE: The National Historic Preservation Program at 50: Challenges and Opportunities – our Comments and Suggestions

1. Data recovery excavations should not be accepted as appropriate mitigation for potential impacts to Native American burial grounds and Traditional Cultural Properties. Instead, avoidance and preservation should be the only grounds for a "No Adverse Effect" determination.

2. Property owners should receive tax credits for preserving archaeological sites, not just buildings

Patricia Martz, Ph.D.
President
California Cultural Resources Preservation Alliance

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First, let me say that I think historic preservation is SO CRITICAL to our lives because our buildings (and other physical components of life -- views, battle grounds, trees, etc.) are the visual presentation of our heritage and history -- to say nothing about economy for natural building components and use of space!

I heard a program on NPR (maybe it was just a report) about lead paint in old buildings. The idea was put forth of how much it would cost to demolish and replace all the buildings built before a specific date in one city!! Horrors!! I think it is critical to address the issue of lead paint (and varnishes and whatever else would have had lead in it) in our historic buildings. How this factors in for cost is important to address, also, because developers (and thus planning boards) always use the issue of "cost" -- how it is cheaper to tear down and build new rather than try to address any problems in buildings. The report said that NO LEVEL of lead in homes should be the standard!

Any way you could address this and come down on the side of preservation would be wonderful!!

Thanks so much!

BTW, I live in Augusta, Maine (state capital).

Phyllis von Herrlich

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Perhaps the biggest challenge to preservation is that of determining what is deserving of preservation efforts as we move forward in time. The more or less commonly accepted preservation targets of the past, Native-American pre-European settlements, Federal and Victorian era structures, sites and

structures associated with great movements or events or important people, the designed and reused commercial palaces, the mid-century gems by "star" architects, and even the bits and pieces of industrialized America are no longer being created, or are increasingly difficult or impossible to find to preserve. We must continue with stewardship of historic resources as we have identified them, certainly. But what, of all being built in the last 50 years, will be worthy of preservation and reuse? What is so iconic to contemporary culture to be worthy of waves of preservation efforts or, perhaps we should say, adaptive reuse, which, for many, is the practical and economic application of preservation?

Adley Cormier, chair
City of Lake Charles, Louisiana Historic Preservation Commission

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I suggest these changes.

1. Data recovery excavations should not be accepted as appropriate mitigation for potential impacts to Native American burial grounds and Traditional Cultural Properties. I**nstead, avoidance and preservation should be the only grounds for a "No Adverse Effect" determination.**

2. Property owners should receive tax credits for preserving archaeological sites, not just buildings.

Thank you,
Rebecca Robles
119 Avenida San Fernando
San Clemente, CA 92672

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I wanted to let you know that we have done some outreach to help you get comments on the THE NATIONAL HISTORIC PRESERVATION PROGRAM AT 50: CHALLENGES AND OPPORTUNITIES document. We have and will continue to promote it on Facebook and Twitter. Additionally, we did an email blast to our membership using Constant Contact that has received a large number of opens and click throughs to your document.

Please keep us posted as this effort progresses.

**Anne Peery, Executive Director**
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*Visit the Florida Trust offices at the Hays-Hood House, a beautifully restored Queen Anne style house located at 906 East Park Avenue, Tallahassee, FL 32301.*

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Thank you for the opportunity to comment on this important topic.

It has been our observation that one of the greatest challenges facing preservation is the under-resourcing of agencies, both in personnel and funds, to adequately address their responsibilities under Section 110 and 106 of NHPA, 4f of the federal transportation act, and NEPA.

Specific to Section 106 and 4f, many agencies have poor public outreach and tribal consultation processes that contribute to public confusion, misunderstanding, and anger that can be avoided. Much of this relates to projects being under-resourced at the outset.

We also find that the lack of a federal incentive for non-income producing properties to be an issue as well as and a general lack of grant funds for projects ranging from bricks-and-mortar preservation to funds for planning. This could be remedied by fully funding the HPF fund, which would allow SHPOs to pass through more funds for these projects.

Thank you again for the chance to comment on this topic.

Ian

Ian P. Johnson
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Visit our Blog, The Oregon Heritage Exchange: http://oregonheritage.wordpress.com/

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Hello,

My name is Sara Childers, I am the new THPO for Upper Sioux Community in Granite Falls, MN.

I was happy to receive the letter about comments to the NHPA at 50.

I would agree with everything that was suggested in the letter.

I would also like to find out why funding is so small to Native Tribes/Communities yet extremely large amount goes to state SHPO's.

If we are to meet the future changes to the rapidly changing Environment, Technology, Demographics, Economics and Education we need the same funding, tools and buildings to further Indigenous Heritage projects and preservation.

When Ken Salazer retired from the Department of the Interior they asked him what advise he would give. He said tap into the Gulf Oil lease monies that are set aside for Historic Preservation. He stated less than 1/3 of the funds gets allocated from that Preservation Fund. Why is that? I would ask that in 2016-2017 that 2/3 of the Preservation lease monies goes to Tribal Historic Preservation Offices and Tribal Cultural Offices. And 1/3 be set aside to tribes every year from those Oil lease funds.

Can Congress enact a law that makes Oil and Telecommunications Companies pay a percentage to Preservation funds?

Those funds could held Tribes/Communities fund their own research labs, storage facilities, build heritage trails that encompass several states. Produce cultural educational materials in a video form. Replant traditional foods and medicines, prairie grasses, wildlife habitats ( injured animals from oil spills). I could go on all day.

Thank-you for including the Upper Sioux Community in the comment process.

In hands of friendship,

Sara Childers
Tribal Historic Preservation Officer
Upper Sioux Community
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Dear members of the Advisory Council:

Thank you very much for the opportunity to comment on your report, "The National Historic Preservation Program at 50: Challenges and Opportunities." It contains many useful suggestions for broadening constituencies and thinking about the more "non-tangible" aspects of historic preservation. Well done.

My main concern is what is lacking – pretty much completely lacking – in the document, and that is any mention of the "S" word. Surely, scientific inquiry remains an important part of who we are and what we do? If anything, our scientific endeavors over the last 50 years have shown us just how little we still know about America's past, especially those times prior to European intrusion. Even as we work to be more inclusive as a discipline, we need to continue to improve upon how scientific archaeology is done, and it is worth pointing out that "inclusive" should, and must, mean inclusive of science as well. We live in a time where science is either a) taken for granted (as it seems to be in your document); b) actively ignored (think climate change); or c) treated like the "bad guy" in the room (e.g., scientific archaeologists = colonialist dupes). Scientists – including archaeologists who practice as scientists – deserves respect equal to that given to other groups. Your document makes mention of improvements in methods, and that surely is welcome, but there is, of course, much more to science than that, and it is disheartening that furthering our scientific knowledge of the archaeological record of our country does not even warrant explicit mention.

Again, I thank you for the opportunity to comment. I hope you are able to broaden your discussion to include science as a legitimate and necessary part of historic preservation activities in the country.

Sincerely,

Dr. Evan Peacock
Mississippi State University

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**The National Historic Preservation Program (Program) at 50: Challenges and Opportunities**

COMMENTS: Submitted by Donald R. Sutherland, PhD, Shenandoah Junction, WV

If I were a member of Congress, I would ask why, after the Program has had 50 years and hundreds of millions of dollars in (supposedly insufficient) funds to develop such, is there still a lack of widespread

public understanding of and appreciation for the importance of historic preservation to contemporary America? What has the Program been doing all this time to foster these outcomes? What has worked, and why wouldn't it keep working? What has not worked? What new approaches might work?

I suggest part of the answer to what might work lies in how the acknowledged needs to promote inclusiveness, recognize the full range of the nation's heritage, improve preservation processes and systems and respect the views and concerns of indigenous people are approached. I see in the discussions of these challenges an emphasis on indigenous people. In the report's look at the future, however, demographics predict population growth driven largely by immigration.

Indigenous people have their own ways of viewing and valuing history that quite appropriately need to be incorporated among the basic concepts of historic preservation. This has in fact been an ongoing concern of the Program since the early 1990's.

New immigrants are another matter, Not only do they promise to constitute a far larger portion of the American public than indigenous peoples, their "history" in America is far shorter, perhaps going back no further than their arrival. We not only will need to understand what is historically meaningful to these immigrants and what sorts of properties might embody this history, but also to alter preservation processes and systems to accommodate such properties. For example, the 50 year criterion for listing in the National Register may leave no room for properties historically meaningful to recent immigrants.

A partial answer to what has not worked may be that what the Program has done **has** worked with its targeted public, but has reached the saturation point within that public. In other words, there may be only so many people who are ever going to be interested in historic properties or to view the economics of historic preservation as amounting to "significant" as compared to, say, those of manufacturing or energy. The economic reality that historic preservation is, and is likely always to be a relatively small income producer translates into a small number of lower income jobs, at least in historic preservation per-SE. Few would risk their academic investment on historic preservation unless it could be tied to more plentiful and lucrative job opportunities. This is indeed one of the challenges facing the program.

I do not necessarily view endless expansion as being a realistic, or even desirable future for the Program. Yes, new initiatives to reach a fully inclusive public, including recent immigrants, are worthwhile and should be pursued. Eventually, however, this, too, may reach a saturation point. History is not important to every immigrant culture, nor for that matter, to every individual in any culture. Also, new adherents may come up against economic realities of historic preservation similar to those at present.

So, what would I suggest? Accept that that historic preservation is a niche program in the grand scheme of things and make sure it is a real gem within that niche. If being a major hotel chain is realistically unreachable, be a really neat B&B. Touch and inspire as many people as possible, but expect the possibilities to reach a point of diminishing returns in any possible futures. Address in the report how the Program might deal with these challenges and, perhaps more importantly from a Congressional standpoint, how this might serve to limit endless requests for increased funding.

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Thank you for the opportunity to comment on the document, "The National Historic Preservation Program at 50: Challenges and Opportunities". As an archaeologist, I would like to focus on the importance of archaeology to the national historic preservation program and, in particular, the role of historic preservation in preserving in place, in

curation facilities, and in documentation the long history and prehistory of the United States. The "Challenges and Opportunities" document appears to underplay this concern. Preservation activities certainly have a major role in helping people appreciate past and present cultural variability and their relationship to it. But appreciation is one goal; education also involves cultivating an understanding of the scientific knowledge that has and can be obtained through preserving archaeological and documentary data and in situ deposits. Without this as a major goal alongside appreciation, educational programs are only half complete. Members of the general public, including people from a diversity of cultural groups and backgrounds, have shown a great interest in learning about archaeological results and how they are obtained. This is not just an interest in one place or one period, but an interest in how and why things were different in past periods and how those differences can be explained. To feed this interest in scientific goals, it would seem very appropriate to acknowledge these kinds of interests and the importance of cultivating them as planning continues.

Sincerely,

Janet Rafferty, Professor Emerita
Dept. of Anthropology and Middle Eastern Cultures
P.O. Box AR
Mississippi State University
Mississippi State, MS 39782

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I would like to suggest that it is time for an effort to identity Mid Century Modern buildings that are under threat of demolition.

For example the Maryville complex aka Cuneo Hospital. The two buildings are connected by an overhead sky bridge and were designed by Eto Belli. The are located at the intersection of Calrendon and Montrose avenues in Chicago's Buena Park Uptown neighbor hood. Some think that Bertrand Goldberg (Prentice Hospital and Marina Towers) was influenced by Mr. Bellis' work.

A developer is working his will with the city and the alderman to demolish the buildings and construct an oversized high rise apartment building. For more information go to The Friends of Cuneo face book page at:

http://www.facebook.com/FriendsOfCuneo

Regards
Peter Donalek
Chicago, IL

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These are my opinions and not necessarily those of my employer, the Navy.

My perspective is that of an employee of a property-managing federal agency, but my observations hold true for any entity choosing among alternatives for historic properties. Managers have many considerations in choosing among alternatives for their properties: economy of operation, economy of maintenance, energy conservation, seismic protection, physical security, on and on, and among these is the continued or adaptive use of historic properties.

I recommend including the challenge of encouraging the continued development and dissemination of architectural and engineering techniques that will improve the ability of property owners to economically rehabilitate and use

historic properties, especially those that do not obviously lend themselves to such use – large, sturdy, infinitely adaptable buildings are rare.

Along with this is the continued development of the economic analysis tools that allow clear and rigorous examination of management alternatives for historic properties in a way that (ideally) is equally useful to all parties in a consultation.

An additional challenge is encouraging and sharing techniques for telling the stories of particular historic properties to occupants and the public.

A simultaneous challenge and opportunity for the federal preservation community is that the expertise and innovation in these areas are broadly spread across the country. The effort therefore must be to encourage, recognize, reward, network, facilitate, and all the other good verbs by which the course of a decentralized community is shaped toward the common goals.

I hope this helps.

Jay Thomas

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One of the biggest challenges is the downsizing of the federal footprint, and the vacancies that his placed on the historic federal building inventory.

**David L. Winstead, Esq.**

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National Historic Preservation Act: 50th Anniversary Celebration
Response to solicited comments.

Gentlemen,

Federal authorities long ago deferred preservation and protection of abandoned Pioneer cemeteries to the States. Most States, California being among the many, have deferred the protection and preservation of these hallowed grounds to the County or City within which they lie. The main problem with this strategy, as usual, is that no provision for funding the required protection and preservation was built into either the Federal or State codes or statutes.

For generations the result has been that these Pioneer cemeteries have fallen victim to development, vandalism, fire, natural erosion, damage by stock or other animals, and overgrowth by neglect. Many are gone due to inattention, or were just plowed under or buried as there was no visible protective agency. Many that remain are in such a fragile condition that their near term continued existence is in question. Counties

are the first to claim that these Pioneer cemeteries have very low priority in their limited fund pool. The unacceptable result is that some sites that exist today, will be lost forever.

These hallowed grounds are rich in helping to understand our cultural evolution and our local history, sometimes pioneer cemeteries are the only evidence of a prior existence or residence in the area. **They are not renewable resources**, and those entrusted with their protection and preservation have done a much less than stellar job to date.

I suggest this lack of funding issue be reviewed again at the National (Federal) level, and some path for Federal, State, and/or local funding for protection and preservation of these valuable historic sites be established. Also, some painful penalties should be built in for non-compliance. These pioneers long ago earned the right of honor and respect from future generations through their many sacrifices. We as guardians of their legacy seem to have vacated our responsibilities, and continue to fail those pioneers miserably. It is time we make some sacrifices of our own to honor their legacy.

Respectfully submitted,
Bill Baccus
41571 Zinfandel Ave.
Temecula, CA. 92591
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Good evening,

Thank you for your support in preserving the past. My idea on the future is to bury the power lines. As a nationally registered property owner and Chair of the Tolland Green Historic District Commission in Tolland, Connecticut we have the perfect opportunity to do this. This is where ***the future can visually restore the historically correct past.***

Our Nationally Registered Historic District, listed on the National Registry of Historic Places, *Tolland Green Historic District* of Tolland, Connecticut is currently in the design stage of **CT State Project 142-149** (Intersection improvements for Routes 195 & 74). This project has been labeled by SHPO and NHR to have an Adverse Effect and our commission is working hard to preserve history.

We recently had an informational meeting to discuss the changes made to the proposed plan based on public comment. The TGHDC is also nominating these Routes as Scenic Roads. We have requested DOT share these plans with the Scenic Road Advisory Committee in hopes to minimize grading, road widening, and perhaps rebuild a historic stone wall, as well as eliminate the possibility for future traffic lights. Since proposed construction is set for 2018 we would like to see the telephone poles removes (about 10) and the lines buried at the same time if a Memorandum of Agreement is approved. This will assist with fewer power outages due to weather conditions and preserve vegetation and foliage by reducing tree trimmer.

In the fall we celebrated our 300th birthday to include a historic house tour, black tie gala, parade - promoting history, and town picnic. The Tolland Green is also used for a farmers market from early spring to late fall, craft fairs and more importantly for educational purposes when our 3rd graders celebrate Tolland Green Days by re-enacting the past. They are assigned to play a historic character (most with a job, eg. blacksmith, hat maker, etc.), dress the way children did in the 1800s, to include packing their lunch in baskets with saw dust (to keep cool), and play historic period games. This is a wonderful way to preserve and promote history within our district.

I appreciate this opportunity to voice my opinion as well as inform you of our current situation and welcome your assistance and guidance with this current project to preserve history.

Sincerely,

Jodie Coleman-Marzialo
79 Tolland Green
Tolland, CT 06084
Property owner &
Tolland Green Historic District Commission, Chair

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Members of the Advisory Council on Historic Preservation:
I am submitting my input to your organization regarding consideration of a unique historical linear resource that has not yet been accepted for the register. To allow sending my signature on the input, it was scanned and attached to this email. If an original letter is required I will send it this coming week.

I appreciate the opportunity to submit my input and do hope serious consideration of the request will be undertaken.

Thank you,

Dorothy L. Moore
Edgewater, FL 32141

[SEE JPG BELOW]

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4725 Lingo Grove Road
Edgewater, FL 32141
moore1322@bellsouth.net
386.345.1322

Dear Members of this Prestigious Program,

**SUBJECT: The National Historic Preservation Program at 50: Challenges and Opportunities**

I am responding to your opportunities request on behalf of a very important historic cultural resource in Florida, a linear road whose construction dates to British ownership of Florida in the 1763-1783 time period. The eastern portion of the State of Florida was then titled East Florida. This road, when constructed, became the only inland transportation for years and was used by British plantations north and south of St. Augustine. Its usage also was very essential during Florida's Second Spanish Period (1783-1821) with its many plantations. In Florida, the road, originating in St. Augustine, ran south from that village for approximately 100 miles and north for an undetermined distance into Georgia and South Carolina. Captain Robert Bissett was the contractor retained by the Governor's office to complete the road south from south St. Augustine to its southern terminus in 1774 at William Eliott's plantation near the southern boundary of today's Volusia County. Eliott's granted land (John Ross, overseer) was the southernmost plantation in eastern coastal Florida during the British Period. Bisset's workers were likely African American men, making this resource also an African American created landscape. Its name began as the Kings Road for its affiliation with British Period government, construction funded by the East Florida Governor's office reporting to King George III's reign. We now refer to this historic road as the Old Kings Road, recognizing its historic unique status.

I would like to request serious consideration by your organization for approval of the addition of this historic British linear historic resource to the National Register of Historic Places. It is not possible to prove integrity of the original entire length of this roadbed where it was constructed during the 1770's in Florida. It would be expected that the route of the original 18th Century road construction was altered as time passed, either temporarily or permanently, caused by various natural occurrences, i.e., storms toppling trees onto the road, flooding in areas causing the route to move to one side or the other of the original roadbed to bypass hazards, dry sand areas preventing horse and wagon passage to utilize the roadbed without bogging down, and perhaps other hazards that faced travelers along the route, such as unfriendly Indians. The roadbed was utilized by the next cultural occupation of grantee land owners. These settlers were granted lands beginning in 1790 by the incoming Spanish who had gained Florida during a treaty with the British in 1783 and all British occupants left. This road was a valuable linear resource for these next plantation owners for transporting supplies into and out from their plantations. Numerous officially approved survey plats drawn of granted lands along Florida's east coast are available to researchers. These maps document the path of the Kings Road as surveyed. Early 20th Century roads did not follow all of the old trail that existed. The route of the Old Dixie Highway and U.S. 1 utilized portions of the road but many areas underwent efforts to straighten roads for easier visitor access.

NRHP opportunity to recognize this unique linear resource, the Kings Road, would be an appropriate action for not only the present but the future. Current and future development of Florida and the road's route on Georgia and South Carolina lands are quickly destroying so much of our historical heritage. There are no doubt there are other lengthy linear resources whose integrity cannot be firmly established on today's landscape. Having a separate category for NRHP recognition and approval would greatly benefit recorded history for these prehistoric or historic assets that should be recognized for posterity.

Sincerely,

Dorothy L. Moore

Dorothy L. Moore
Archaeologist and Historian, Volusia County, Florida

Members of the Advisory Council on Historic Preservation,

I appreciate the opportunity to comment on the Challenges and Opportunities document. Our National Historic Landmark District is also celebrating its Golden Jubilee meaning some of us have been on this walk with you this past 50 years. The program established by the NHPA has indeed had many successes. This NHL, established shortly before NHPA, has seen the positive impacts of Section 106 reviews, federal and state tax credits, local preservation ordinances and numerous private non profit 501(c)(3) organizations preserving structures to tell the stories of those places. All of that said, it is definitely time to refocus. I would add my voice to the view that we have paid "insufficient attention to the cultural values". That is certainly a mild and polite way of putting it. It is my belief that we need to do far more than "refine and adjust the tools currently in use". We should re-ask the fundamental question of why we believe preservation is important and identify and define what could be accomplished. We can not garner public and political support, obtain sustainable financial resources, have great leaders, secure inclusiveness without a well articulated goal.

Maybe a lesson from history: After World War II, the Advisory Board on National Parks, Historic Sites, Buildings and Monuments , under the auspices of the Historic Sites Act of 1935, proceeded to undertake their mandate to inventory historic sites on a national level. Obviously, this was an overwhelming task. As you know, what they did was ask why they were doing it. In deciding the goal was to tell the story of the establishment and growth of America, they identified themes and set out, feet on the ground, to literally find places that would help tell that story. Following the passage of NHPA and the organization of state historic preservation offices mandated to inventory their states, the designations multiplied to include places that were important on a state and local level, importance being largely defined on a political, economic or architectural significance. Now we have 90,000 National Register sites and hundreds of thousands of state and local sites. Each tells its own story. The themes, the connections, the larger story, the story of the nation, is often lost. Have we, in part, lost the reason "why" besides the desire for "local" color?

In reviewing the Council document "Recognizing the full range of the nation's history" seems to be the goal under which the other "challenges" are tools. I am not sure "recognizing" is a strong enough verb. Under that goal there appear to be two subgoals 1.) renewed connected interpretation, maintenance, and continued protection of the physical structures and sites that allow us to know, feel, and understand the events, times and people who created our nation and 2) (the new one) the story of our peoples. This one would take some work because so far we only deal with properties. However, America has always been a "changing face". How do we celebrate the history of divergent groups inclusively and make it all American history? What is the preservation of culture? What is a cultural landscape? What are the environmental considerations here? How does "our" preservation relate to the preservation of the earth on a larger scale than a green building? Is a partnership with the conservation movement realistic and a means to engage the younger generations?

The Council is certainly correct that "The "why" of preservation matters just as much as the "what" and the "how"", maybe even more. I would suggest a conference of younger voices in preservation and cultural resources to divergent think on the question of "why" and some of the "how" for both our physical resources and cultural heritage. I believe it could refresh all of our thinking and begin to develop the leadership for the future.

Oh to be young again. Thank you again for the opportunity to comment.

Cynthia C. Neely
Georgetown Silver Plume National Historic Landmark District
Box 532, Georgetown, CO 80444, 720 201 7161

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Per your request for ideas on the future of the National Historic Preservation Program I have the following thoughts in no particular order.

1) As we "celebrate diversity" I suggest that you cast a wide net and include historic properties that are of significance to a variety of "hyphenated Americans" (eg. Hispanic Americans, African Americans, Italian Americans, Jewish Americans, etc.) as well as Native Americans.

2) With our increasingly global perspective I recommend that further attention be given to clarifying the application Section 402 of NHPA.

3) I recommend that thought be given to developing an "outreach" strategy for the Council that continues to publicize the Section 106 success stories, as you have done for the 50th anniversary, and takes some of the mystery out of the Section 106 process. Consideration also might be given to expanding the Council's mandate to advise the President and Congress on historic preservation issues to include State, local and private preservation partners.

4) As Federal funds for historic preservation continue to decrease consideration could be given to establishing a 501(c)(3) "Friends of the ACHP" to encourage more public engagement in the work of the Council and as a source of additional funding. The Friends group could convene periodic conferences on matters pertaining to the work of the Council that could be streamed live.

I trust these fairly random thoughts might contribute to the visionary process you are involved in.

Happy Anniversary!

Jordan Tannenbaum
Chief Development Officer, US Holocaust Memorial Museum

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It would be very useful if the NPS would very clearly state what CLG status is all about. There is an impression that CLG communities are part of the federal preservation process, helping to safeguard National Register properties and districts and many well intentioned local planners do just that. The problem is that those planners work for a local government and the reality is that CLG status does not confer any additional authority. With experience, local planners figure this out, but the impression is that NPS is happy to let the inexperienced planners labor under the impression that their legal framework somehow includes federal backing.

The National Historic Preservation Act of 1966 did not change how localities accomplished preservation. Well outside the realm of federal activity, local governments had already figured out their own ways to protect their character-defining historic assets, when Charleston introduced the nation's first historic district ordinance in 1931. The authority for this type of legislation was the exercise of a jurisdiction's police power. State and federal programs essentially buy preservation, through project funding and tax credits. Localities establish a regulatory process for private investment in historic preservation, without having the leverage to provide the means.

The local commission also functions in a world of owner expectations for the economic use of property. In this context, the use and adaptation of historic properties has sometimes occurred over centuries. While the federal standards typically focus on a single period of a building's significance, preservation in a historic district is compelled to recognize the sequential history of a building. The experience of a community is not conveniently contained within the parameters of a designated period of significance. Change is what occurs in historic districts and change is what commissions must be able to handle. Old buildings need to be adapted to contemporary uses or they end up abandoned as economically unfeasible. Revitalization also entails new construction where there are gaps in the streetscape. There are no federal preservation standards to guide new construction, so localities identify the necessary criteria themselves.

The federal, state, and local processes are not only different from one another, they are disconnected. A property owner seeking local permission for a specified treatment of a historic building may also want to pursue state or federal tax credits for the same project. To do this, however, the owner must engage in two different processes, where neither one is set up to coordinate with the other. The local process is open to the public and the evaluation of proposed work is undertaken by local citizens familiar with the community and attuned to its historic continuum. There are often compromises made, to ensure preservation remains feasible within the context of economic viability. That point is worth repeating. Individual bureaucrats in state and federal agencies may be able adhere to their personal preferences (couching them in terms of the SOI Standards, of course) and holding out the enticement of tax credits to help the applicant agree to their terms. At the local level, however, preservation is more of a discussion, with the economic expectations of property owners a very real factor.

When a property owner has obtained the local approval and then applies for tax credits, there is absolutely no coordination between the state and the community, even if the locality is a CLG. The state review will identify a period of significance, which may or may not relate to the significance of the building recognized by the local community (any consistency in this regard would be purely coincidental). There is no public notice required. The outcome is that the state bureaucrat (whether a seasoned professional or a rookie), with very desirable tax credits as leverage, is in a position to impose the state's desires over whatever the locality may have determined is important. Any differences of opinion will thoroughly confuse the property owner and conflicts are neither discussed nor resolved because the process excludes any consultation with anyone. The property owner is left to reconcile the two outcomes. If they cannot be reconciled, the tax credits get dropped because that process is voluntary, whereas a permit, issued upon local commission approval, is not.

At the state and federal levels, preservation is a bureaucratic process initiated by specific activities. Actual preservation may or may not occur, but a process will be initiated and pursued to a conclusion. At the local level, the imperative of a preservation program is as part of a larger process of encouraging investment and seeking to maximize revenue (to pay for sidewalks, schools, and garbage pick-up). Preservation is not an end, but rather a means to support a community's continued growth and development. The CLG program is well intentioned, but it was set up without proper attention to the local legal framework for preservation. The NPS is to be commended for the support it gives, but it will always be limited in effect until it decides to figure out how to support the localities instead of thinking the localities support them.

**Erik F. Nelson**
Senior Planner
City of Fredericksburg, 540 372-1179

Dear colleagues at ACHP,

Many thanks for writing "The National Historic Preservation Program at 50: Challenges and Opportunities" to address the challenges and opportunities facing the national preservation program. There are several bullet points that I would like to show specific support for that focuses on the pressing issues of diversity and inclusion of underrepresented communities in the field of historic preservation.

As chairwoman of Asian and Pacific Islander Americans in Historic Preservation (APIAHiP), I want to share that there is little awareness or understanding of the challenges in preserving historic neighborhoods and related efforts to preserve and protect historic and cultural assets that are significant to APIAs. As our communities continue to deal with changing economic and socio-cultural dynamics and threats of redevelopment and gentrification, many community stakeholders turn to planning and policy approaches like historic preservation for help. However, in an era of profound change, the threat to these non-renewable historic resources is accelerating, requiring innovative planning solutions. These threats include diminished funding for preservation at the federal and state levels, the impact of gentrification on historic and cultural resources, and lack of or limited administrative support for local-, state-, and federal-level preservation-level programs targeting ethnic/racial groups and other underrepresented populations.

One crucial issue we face is the need to develop a broader approach to historic reservation. Traditional standards in historic preservation have been challenging for AAPIs and other underrepresented groups to preserve and protect their historic and cultural assets due to the lack of understanding of structural forces. With strict standards on criteria for NHL and NR consideration like "integrity" and "significance", these act as barriers to access resources and funding for many underrepresented groups, which then perpetuates the disparate gaps of representation of communities of color, the LGBT community, etc. The close relationship between social inequality and various forms of dislocation and dispossession raise questions about the primacy given to owner's consent in preservation action -- for many underrepresented groups, they have a long history and legacy of being denied the right to own or occupy place. Successive layers of occupation at and use of particular sites, and therefore multiple claims to public memory, raise difficult questions about how to define the "period of significance" for historic properties and how interpretation can best recognize multiple stories at any given place.

Another issue is the need for capacity building and leadership development in underrepresented groups -- it is crucial that there is a more diverse and inclusive representation in our field that is at the forefront in redefining the scope, policies, practices, and priorities of the preservation movement as a whole. As part of this, I advocate for strong support for leadership development for emerging professionals and for capacity building and financial support for their organizations. I support the recommendation for programs targeting students and youth but moreso advocate for support geared towards young and mid-career professionals.

Thank you again for this opportunity. Please let me know if you have any questions about my comments.

Best,
Michelle

****
Michelle G. Magalong
Chair
Asian and Pacific Islander Americans in Historic Preservation
www.apiahip.org
www.facebook.com/apiahip
@APIAHiP

1. Increase NPS funding for THPOs so they may hire more staff, increase career development and training, etc.
2. Apply Indian Preference to Federal Government wide positions in archaeology, anthropology, and museum work that pertain to Tribal issues.
3. More Federal Agencies should create positions solely for Tribal consultation and outreach.
4. Increasing funding for Tribal museums and digital curation, etc.
5. Increase funding to Tribes for repatriation of humanremains and artifacts under Native American Graves Protection and Repatriation Act (NAGPRA).
6. Increase funding to Federal Agencies and Tribes for protection of sites and Archaeological Resources Protection Act (ARPA) issues.
7. More classes and programs at Tribal Colleges to get Native students interested in careers in Tribal Historic Preservation.

William Kurtz
Archaeologist/NEPA/Fire/Safety
Bureau of Indian Affairs
Midwest Regional Office
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When your eyes behold the Black Hills remember me if you can. A defender of my people and this land. Crazy Horse has said this. *TashunkeWitko Olowan*

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As someone who works with the NHPA on a daily basis, I have the following comments/concerns:

Energy Development/transmission: Unless these tie into the existing federal nexus or a CORPS permit is required, review of windfarms is minimal, at best. As we move more and more towards green energy as a nation, we need to be evaluating the impact of these large windfarms and transmission lines on our cultural landscapes, sites and archeological resources. In Oklahoma, many important resources are being impacted by these windfarms with absolutely no review under Section 106 required. How does the ACHP intend to make these reviewable under the law, if at all?

Infrastructure development: with a Governor that is requiring replacement of EVERY deficient bridge, preservation of transportation resources in Oklahoma is becoming more and more difficult. How do you proposed to address the perceived needs of State governments?

"Intangible" aspects of heritage: from the perspective of someone who deals with Section 106 literally every day, it is hard enough to get the federal agencies and their delegated authorities is understand that real/physical/understandable aspects of why a property is historically important. How do you propose as the ACHP to make the intangibles understandable to the practical, every-day users of the NHPA?

Improving preservation processes and systems: Outcomes over process???? The NHPA is a process, a linear one. If you are just looking for outcomes, get rid of the act and have absolutely no authority. The act and the linear process is what makes preservation possible and work.

Lynda S. Ozan
Architectural Historian/NR Program Coordinator
State Historic Preservation Office
Oklahoma Historical Society

Oklahoma History Center
800 Nazih Zuhdi Drive
Oklahoma City, OK 73105
405-522-4478

*The mission of the Oklahoma Historical Society is to collect, preserve, and share the history and culture of the state of Oklahoma and its people.*

Preservation50
1966-2016

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Comments to Advisory Council on Historic Preservation

Taken from:

**THE NATIONAL HISTORIC PRESERVATION PROGRAM AT 50: CHALLENGES AND OPPORTUNITIES**

Both the challenges and opportunities are embedded in the statement below
Rethinking established preservation processes and systems. Based on furthering the goals of inclusiveness and civic engagement, a fresh look at the procedures and criteria that guide the recognition, protection, and enhancement of historic properties offers opportunities for achieving greater transparency, stakeholder and public participation, and efficiency. Such a re-examination could also promote better integration of preservation systems with other environmental and social impact processes and spur innovative thinking for new tools and techniques, especially the application of technology.

These are **Major Issues** that need top priority at this point in time.

Urban change and redevelopment. Economic and demographic shifts have left communities with abandoned properties, excess infrastructure, and insufficient financial resources to maintain services and facilities, threatening historic properties and neighborhoods in both large cities and **[ESPECIALLY]** small towns.

Improving preservation processes and systems. Current criteria for evaluating historic significance and legal protective mechanisms need to be updated to reflect the values communities place on their [**DIVERSE]** heritage and to elevate outcomes over process. Complexity and over-reliance on professional expertise stifle public engagement and impede the preservation of what citizens really value.

Benjamin F. Speller, Jr., Ph.D.
Email: spellerben@embarqmail.com
Phone: 252-482-4079 (Edenton)
Cell: 919-402-3240

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To Whom it May Concern,

Thank you for the opportunity to comment on The National Historic Preservation Program at 50: Challenges and Opportunities. I have two remarks as explained below. Please feel to contact me with any questions.

1.) **Page 2, under "Challenges". "There is a general lack of widespread public understanding and appreciation for the importance of historic preservation to contemporary America."**
I would add that there is a general lack of widespread public understanding of how historic preservation works in contemporary America. For some, the interest is there but it never develops into anything because historic preservation is not a prevalent topic in contemporary society. Helping interested people act is as vital as getting people interested.

2.) **Page 3 "Promoting Inclusiveness" and "Recognizing the full range of the nation's heritage"**
As the document emphasizes, the sites we currently preserve as a nation do not adequately represent the lives and actions of minorities. Changes must be made so that the sites we preserve reflect our nation's history as comprehensively and accurately as possible. Furthermore, it is vital that this inclusivity continue once the majority becomes the minority, as Dr. Wagner predicts it will in the near future. If we are not careful, we risk applying those same prejudiced preservation tactics that have marginalized African American, Latino, and indigenous histories to Caucasian history. The most at-risk sites will be those associated with oppression of past minorities. We have already seen this with the desecration of Confederate memorials and graves across the South. It is not implausible that this will spread to historic sites as some seek to destroy anything that offends our current morals. It is imperative that we develop processes to handle and preserve such significant at-risk sites not because we condone the ideals with which they have been associated, but because destroying them would facilitate a false representation of our nation's history. It would also negate the importance of sites associated with fighting oppression: the John Brown Cabin is insignificant without the context of slavery. Little Rock Central High School would not be noteworthy without segregation. We need to respectfully and carefully consider the full importance of controversial sites and develop regulations that actively include them in our preservation plan.

Best,

Stephanie Ballard
Historian/Survey Coordinator
State Historic Preservation Office
Oklahoma Historical Society
Oklahoma History Center
800 Nazih Zuhdi Drive
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405-522-2713

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ACHP Colleagues:

It has been my honor and pleasure to work for the Oklahoma State Historic Preservation Office and to collaborate with our many preservation partners since 1976. The programs established under the National Historic Preservation Act have had profound impacts on the identification and treatment of our state's historic properties. Oklahoma state statutes offer no protection of these special places, and until

the Certified Local Governments program was created, only three municipalities had preservation zoning ordinances on the books. While Oklahomans trace the history of our statewide preservation movement to the mid-19th century, it was not until passage of the NHPA that archeological and historic resources began to be identified in meaningful numbers across the state and that there was a mechanism for protecting many of them. The Historic Preservation Fund has been essential to our progress in preserving the heritage of all Oklahomans and will be critical to the future of our programs.

Obviously, the NHPA established a strong foundation for historic preservation across the nation. To build on that foundation, we need effective leadership in the public and private sector, better communication among the various partner agencies and organizations, the use of technology when it really enhances preservation outcomes, and the increase of public awareness about why preservation of our shared heritage is so important.

I strongly agree that education is the most important historic preservation tool available to us. We must always be engaged in informing the public, training new professionals, and learning from one another. Developing strong leaders is critical, and part of our succession plan should be to make sure those new leaders understand the foundation on which they will be working. Many people have helped build the national preservation programs, and future successes will spring from those accomplishments.

I firmly believe that the NHPA and associated regulations provide the flexibility needed for the future. The National Register criteria does not need revision in order to expand what we consider significant. Nor, do we need to develop new property types in order to evaluate and register landscapes and similar resources. Time and effort would be better spent ensuring that all users of the criteria and nomination process understand how to use them and how to engage cultures and communities that are not involved in the national preservation program.

Melvena Heisch
Deputy SHPO
State Historic Preservation Office
Oklahoma Historical Society

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The NHPA has often encountered resistance on the part of federal agencies, and still does. There are times when the effort to circumvent compliance with §§106 and 110 appear to exceed the time and effort necessary to comply. The basis for this resistance can stem from fear that an outside force will take control of properties thought to be one's own. Pride can also be a strong factor—"I am responsible for these properties", also, "these belong to my agency". A third factor is the assumption that with recognition of a property as historic will simply lead to being forced to spend money on that property. A major issues is that "preservation" is not thought to be within the agency's mission, or in anyone's job description. It is not thought of as something anyone is required to do. NHPA is thought of as an administrative process to be bypassed, in any way possible, all in the name of moving a project along.

The rationale and justification put forth by agencies to avoid compliance is expansive, and often imaginative, such as "…we're not sandblasting the building, we're using walnut shells".

Overcoming these issues takes acceptance by federal agencies of the value cultural resource represent to our country, the ability of cultural resources to provide opportunities through education, investment, community redevelopment, and heathy cities and communities. Too often agencies appear to limit their consideration of resources under their jurisdiction to only immediate goals—economic, political, or development. Consideration of long-term benefits often falls victim to the short-term nature of military deployments—the need to get thing done under my watch, and let the next commander deal with what is left.

Preservation of our national patrimony has to be accepted as part of every agency's "mission", a responsibility.

So, what to do. Educate, starting with ACHP and SHPO staff, and moving down to each federal agency, starting with the most sympathetic, such as the Smithsonian. This will hone skills in presenting the concept. The training currently offered focuses on how to comply with NHPA, rather than why comply.

Educate community development agencies to the importance and values of historic properties, and how they add value to neighborhoods. Try to prevent mass clearing of housing such as what recently happened in Detroit.

Integrate compliance with NHPA into the military training programs at TRADOC, and all military training services. Offer, and be persistent, in scheduling training programs at all federal agencies. Concurrently, initiate top level meetings with agency heads to present the program and the mandate and value of compliance. With the change of administrations, the department heads will change. It is an ideal time to have President appointee to President appointee meetings.

It is a start. More ideas if desired.

John

John J. Cullinane, AIA
Historic Architect
SEARCH Training

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Archaeology—Maritime Archaeology—Architectural History—History & Archives—Heritage Design

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Thanks for the opportunity to provide comments on "The National Historic Preservation Program at 50: Challenges and Opportunities" document. It summarized a great deal of information and sets forth many challenges.

As a practitioner in a SHPO office I offer the following observations (these are my opinions, not those of our office).

Page 2: "Urban change and redevelopment". It's not just urban change, its rural too. It feels like we are swimming against some very powerful demographic and economic shifts, and historic buildings and places suffer when owners have no economic ability to maintain a structure.

Page 3: "promoting inclusiveness"...yes, we need to continue to figure out ways to improve diversity in the preservation profession, and improve our ability to work with minority populations.

Page 3: "improving preservation processes and systems". Yes, we need to rethink these and try to simplify! The system that has evolved over 50 years has seemingly gotten more and more complex, to where even those of us in the field find it difficult to understand all of the nuances. It is frustrating that each federal agency seems to want its own PA, program comment, etc to tailor the 106 process to their needs. This suggests 106 may need to be redefined overall. While I fully support simplifying and streamlining, the result is our staff not only has to learn "standard"

section 106, they have to try and keep up with a myriad of other variations. It is a LOT for a new staff person to try to learn and apply. Could there be "categorical exclusions" for all of Section 106...so that our staff don't spend hours and hours processing reviews for projects that have little likelihood of affecting a historic property? Or other ways of limiting Section 106 review to focus on actions that are more likely to impact historic properties? The net is cast so broadly in an effort to "catch" everything, but a great deal of time and resources are used, and we can get bogged down in areas with little productive benefit. It would be great to use that staff time instead reaching out and building the appreciation for history, culture and preservation called for on the top of page 3. We currently have very little time to do any type of outreach or education that could encourage more and better preservation. While we know that it is critical, our inboxes (both real and digital) are ever demanding of reviews that need to be done and comments made.

Page 3 "democratizing preservation"....here and in other places in the document (page 4 "rethinking established preservation processes and systems") there seems to be an interest in putting more weight, or better incorporating the interests of "the community" and "public" into determining preservation outcomes. I think there is a need to proceed carefully, as I can see both positives and negatives. Does it become a popularity contest? What happens if a community doesn't care about an otherwise "significant" property.... I can imagine that there could be properties that professionals might understand to be significant (including those of under-represented groups) but that the larger community doesn't care about. Would you just let it go? Determining significance using the existing NRHP criteria already can seem subjective, and we have the potential to make this perception grow.

The loss of respect for the value of "experts" or authority is very real, and since the NHPA is based on a system that requires a great deal of professional expertise, I think we need to confront what this means head on and adapt to this cultural shift. Now that everyone can be an expert with just a few clicks of their mouse on any topic, how can we morph the systems of the NHPA to allow for more interpretations of significance and yet remain relevant.

Thanks again for the opportunity to share thoughts. I do hope that we can continue to refine, improve and keep relevant, these programs have accomplished a tremendous amount on just shoestring budget. This country is much richer in so many ways because of the NHPA, and I so hope that we can continue this proud tradition.

Elizabeth M. Johnson
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Please note NEW email address: ejohnson@scdah.sc.gov

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I never knew of this preserve America.

I live in Wells Maine, where no one seems to care about historical buildings, there is no interest in preserving wood windows or anything else.

I own 2 pre 1800 houses, both on US POST Rd, ROUTE ONE.

the smaller house was at one time a U S POST OFFICE according to what I was told the property was built before 1800. can find no records to prove it, and so I can't find a way to get it onto the national historic register to preserve the building.

the larger house was built sometime in the 1700's has a nice brick arch & remains of the huge hearth, but only a simple chimney now rises up. It needs massive renovations to the sills that support the house.

currently if we renovate ANYTHING we have to rip it all apart & bring it to code, destroying the antiquity of the house. the house is very well built even with the 8x8 floor beams/joists that are 30" something o/c

Is there a person in MAINE, someone to help us step by step?

Briar

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From: cherise bell <cherise.bell@yahoo.com>
Subject: comments on future public policy

Message Body:

I do agree with the observations stated. I would add the following:

Affordable housing - legislation is needed to allow minority and low income to stay in their small houses located in a designated historic district. What legislation can be developed to protect private property rights of a property owner from the new investor/developer coming in and expanding the house next door to twice the size. Historic Preservation Boards deal with "aesthetics only". Policy is needed regarding Zoning departments to deny infill development to build new construction which maximizes building to lot ratio allowing McMansions to over shadow historic houses, driving up real estate value and taxes.

Middle class - Federal programs are available for the lower income regarding housing. The Middle class makes too much money to qualify but often have the financial means to take on a restoration project. Lower mortgage or loan rates for the middle class could be offered for restoration of buildings in target historic districts to stimulate revitalization in an economically depressed area.

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This e-mail was sent from a contact form on Preservation50 Future Public Policy Page (http://preservation50.org/future-public-policy/

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Dear Advisory Council staff,

Thank you for the opportunity to comment on your report to the incoming administration and 151st Congress on the future of the National Historic Preservation Program. Attached are the Piedmont Environmental Council's comments.

Please don't hesitate to contact me with any questions you may have.

All the Best,

Kristie Kendall
Historic Preservation Manager
Piedmont Environmental Council
45 Horner Street
Warrenton, Virginia 20186
(540) 347-2334 ex. 7061 (work)
(703) 407-7507 (cell)

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Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001
-
2637

[SEE COMMENTS BELOW]

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Timothy J. Guyah, M.A.
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*"Emancipate yourselves from mental slavery, none but ourselves can free our minds"*

*Robert Nesta Marley (Bob Marley)*

[SEE COMMENTS BELOW]

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Please see the attached comments.

Laura Dean, PhD
Federal Preservation Officer
Rural Utilities Service
1400 Independence Avenue, SW
Room 2229, Mail Stop 1571
Washington, DC 20250-1571
202-720-9634

[SEE COMMENTS BELOW]

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ACRA is pleased to submit the attached comments regarding the ACHP's report on NHPA at 50. Thank you.—

L. Eden Burgess, Partner
**Cultural Heritage Partners, PLLC**
Direct: 703-965-5380
Office: 202-567-7594
eden@culturalheritagepartners.com

[SEE COMMENTS BELOW]

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Hello, please see the attached letter, and contact me if you have any questions.

Regards,

David Lindsay
Manager, Government Affairs
Society for American Archaeology
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David_lindsay@saa.org

The 81st Annual Meeting
Orlando, Florida
April 6-10, 2016

[SEE COMMENTS BELOW]

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Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637

February 23, 2016

Re: The National Historic Preservation Program at 50: Challenges and Opportunities

Dear Advisory Council Staff,

The Piedmont Environmental Council (PEC) appreciates the efforts of the Advisory Council on Historic Preservation (ACHP) to take a hard look at the National Historic Preservation Program and brainstorm where and how the program can evolve and innovate to meet future demands. We agree that in the coming years, demographic, environmental, and technological changes will necessitate structural and procedural changes and address existing deficiencies within the program. We would like to expand upon some of the challenges and opportunities that you recognized in your report and offer our thoughts on potential solution to the issues identified.

In your report, you identify a number of activities regulated or permitted by the Federal and State governments that are directly impacting and destroying historic resources. We would like to see more elaboration on the cumulative toll of these activities. For example, a transmission line through the Madison-Barbour Rural Historic District in Orange County, Virginia, could easily knock out this entire large landscape. Define "impacting...in a massive way," to also include large landscape and battlefield destruction. The cultural landscapes, cultural sites and archeological resources you recognize are part of much larger landscapes. Changes to the viewsheds of these landscapes impact the historic context and integrity of all resources within the landscapes.

In addition to energy and infrastructure projects, we are also seeing the federal footprint having an irreversible impact to historic resources. Relocation of federal facilities, and the numerous historic resources they contain, to rural areas negatively impacts small communities. These relocations can cause dramatic population increases, traffic congestion, and increase costs to both the Federal Government and the communities where the relocation occurs. The inevitable sprawl from rapid population increases does not allow for the consideration of the impact on historic resources and they are too often destroyed in the process.

As part of the projects undertaken or funded by the Federal government, we would like to see recognition of the continued weakening and growing ineffectiveness of the Section 106 program as it is currently structured. The Federal Government needs to implement measures to ensure that the Section 106 process works as it was intended to - this includes staffing evaluation at both the Federal and State levels to ensure that unbiased reviews of historic resources occur. Too often, state agencies provide only cursory reviews to expedite findings in line with their desired outcomes. For example, the Virginia Department of Transportation has a louder voice than the agency tasked with the Virginia Department of Historic Resources, the agency tasked with protection of the resources. Additionally, we would like to see the enabling legislation for the

ACHP strengthened to allow them to hold Federal agencies accountable in their reviews regarding Federal project impacts to historic resources.

We would like to see a clear plan and vision of how the desired changes to the National Historic Preservation Program will be made. We agree with many changes within the report, including fuller recognition of the range of the nation's heritage, improving preservation processes, and better leadership and expertise. But more than changes or solution, we just saw an acknowledgment of the issues. We would like to see a plan that includes solutions and an implementation strategies, as well as what the associated costs will be. While we agree that increased funding would improve the ability of the program to function, we also strongly believe that a more efficient use of existing funding would allow the program to function more effectively.

In closing, we would also like to expand upon the challenge of developing public and political support for preservation. We agree that the environmental and economic benefits of preservation have, to date, been insufficiently documented or measured. We also believe that historic resources have not been properly valued, especially for the purposes of meaningful mitigation projects. As a first step, we need to plan for appropriate quantitative and qualitative valuation of historic resources. In doing so, we can ensure that the benefits of preservation can be documented and that mitigation projects assign appropriate valuation to these resources.

We appreciate the opportunity to comment on this report and hope that our comments are helpful. We look forward to seeing the final report that will be submitted to the incoming Administration and Congress. If you have any questions, please don't hesitate to contact me below.

Sincerely,

Kristie Kendall
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Key words/Phrases – Diversity; Tribal Historic Preservation Offices; Oral Tradition; Diversity in our Profession; Indian Preference Act of 1934

Thank you for the opportunity to comment on and provide suggestions regarding the possible challenges that face NHPA in the next 50 years. The "divers"; "challenges"; and "opportunities" the ACHP has outlined provide a great opening for discussion, to keep my comments/suggestions focused I selected three-specific solutions that intersects multiple divers, challenges, and opportunities, these are: increased funding for Tribal Historic Preservation Offices; respecting/considering oral tradition during the section 106 process; and becoming diverse as a profession.

> Divers: Demographics; Cultural values and Tradition.
>
> Challenges: Promoting inclusiveness; Recognizing the full range of the nation's heritage; Improving Preservation processes and systems; Respecting the views and concerns of indigenous peoples.
>
> Opportunity: Celebrating diversity; Furthering collaboration; Supporting sustainability; Enhancing appreciation for heritage through education; Rethinking established preservation processes and systems.

I acknowledge the population growth and increased diversity from 1966 to present. I would like to remind the ACHP that North America was a more diverse continent when this nation was founded in 1776 – at the time there were scores of independent Tribal Nations each perhaps varying in culture, religion, tribal code, etcetera. Additionally, they were also multiple new immigrant groups from Europe and Slaves from varying cultures in Africa. Added to this mixture were the backdrop and legacy of the conquistadores in Mexico (portions of which are now the United States) and the fall of Aztec and its contemporary's empires. In that light rather than viewing recent demographics as an increase in diversity the ACHP may also consider thinking of the US as returning to a more diverse populous. In this vein, I believe it is important to acknowledge that the North American archaeological record mostly consists of Native American cultural remains. The drivers of demographics and cultural values and tradition; the challenges of promoting inclusiveness; and respecting the concerns of indigenous peoples; the opportunities to celebrate diversity and furthering collaboration cumulatively intersect. If we are truly concerned about the divers and challenges we face today then we have to seize this opportunity to provide more funding to Tribal Historic Preservation Offices. We as a Nation should invest in those who have been the stewards of North American prehistory long before the existence of the United States. If we are to promote inclusiveness and respect the concerns of indigenous peoples then we must first be open as scientists to accept their methods and beliefs as evidence, that is, respect and consider oral tradition during the section 106 process. Before we have the opportunity to celebrate diversity we must actually provide the opportunities to become diverse as a profession – one way is to simply apply the Indian Preference Act of 1934 (title 25, USC, Section 472) for all jobs pertaining to archaeology, museum studies, cultural resources, etcetera – federal government wide. Adding the provisions of the Indian Preference Act to these jobs will greatly assist us as a Nation in recognizing the full range of our nation's heritage – a heritage that began long before 1776.

**MEMORANDUM**

**TO:** John Fowler, Executive Director
Advisory council on Historic Preservation

**FROM:** Dr. Laura Dean, Federal Preservation Officer
Rural Utilities Service

**DATE:** February 29, 2016

**SUBJECT:** Comments on the Advisory Council on Historic Preservation's draft policy recommendations titled, *The National Historic Preservation Program at 50: Challenges and Opportunities*

The following comments are submitted in response to your invitation to review policy recommendations titled, *The National Historic Preservation Program at 50: Challenges and Opportunities*, which have been drafted by the Advisory Council on Historic Preservation (ACHP):

General Observations

1. The impact of the National Historic Preservation Act (NHPA), which is the centerpiece of federal historic preservation, is experienced primarily through Sections 106 and Section 110 because of the requirements they impose on federal actions and management decisions. In most cases, in fact, the challenges identified in the draft policy recommendations are generated directly by these federal requirements. Yet, inexplicably, the ACHP's draft policy recommendations contain no direct reference to or explicit acknowledgement of either of these sections of NHPA. This is a glaring omission which needs to be explained and remedied.
2. The ACHP's policy recommendations state that federal agency actions threaten historic properties in much the same way as they did in 1966. While the broad categories of projects might be similar, the scale of their scale is quite different today than in 1966. Today the emphasis is on repair and improvement of existing infrastructure, much less on its build out and expansion. As an example of the type of federal action which is harming historic properties, the ACHP cites broadband deployment. Yet the record of the RUS Recovery Act and telecommunications Programs do not agree with this assessment. Quite to the contrary, Rural Utilities Service (RUS) documentation demonstrates that broadband infrastructure whose construction is very circumscribed with a relatively minor impact on the landscape only very infrequently results to adverse effects to historic properties. Furthermore, prior to 1966 historic properties were being lost at an

alarmingly rapid rate. However, today it appears that as a result of implementation of NHPA, most federal actions do not adversely affect historic properties. If my impression is correct then this is actually the measure of the successful "taking into account" required by section 106 of NHPA. The challenge is to build on this success by making Section 106 review more efficient and improve the cost/benefit ratio so that federal historic preservation will survive the era of limited federal budgets.

3. Consistent with the failure to acknowledge the impact of Sections 106 and 110 of NHPA on federal historic preservation, the ACHP's draft policy recommendations are decidedly academic in tone and substance. There is nothing inherently wrong with this approach, except in this case there seems to be an effort to distance the draft recommendations from the practice of Section 106 review (36 CFR Part 800). For example, there is significant emphasis in the policy recommendations on "*intangible heritage*" and "*cultural values and traditions*," aspects of heritage usually restricted to academic discourse. However, the ability of the federal government to identify, evaluate and manage such intangibles in in a clear, concise, predictable and defensible manner with objective measures clearly and concisely identified is virtually impossible. The Section 106 regulations are already sufficiently flexible to permit federal agencies to reasonably consider such aspects of heritage when it is in the public interest to do so. Therefore, it is unclear why a policy recommendation is warranted, especially since it has the potential, not to clarify, but to confuse the discourse. The reality is that agencies cannot justify the expenditure of federal funds in the absence of a tangible resource whose importance can be clearly documented and explained in a predictable and defensible manner.
4. Although developed from ACHP member and staff input, the draft policy recommendations do not benefit from consultation with an essential component of the federal historic preservation community; i.e. Federal Preservation Officers (FPOs). FPOs who are responsible for overseeing implementation of their respective agency's historic preservation program, including compliance with Section 106, were not engaged by the ACHP in a meaningful way in drafting the policy recommendations. Because they work intimately with federal historic preservation on a daily basis and typically possess a high degree of training and experience in the practical application of NHPA, I strongly recommend that the ACHP consult with the FPOs prior to proceeding any further with, and throughout the evolution of, these draft policy recommendations.
5. The draft policy recommendations appear to be rather narrowly assess the consequences which may result from their implementation. Cost, in terms of time and resources, is a particularly critical concern with implementation of some of the ACHP's recommendations. The rising cost of historic preservation generally as well as those resulting from efforts to address "*intangible heritage and cultural values*" coupled with static or shrinking budgets will present serious challenges in the future. For federal historic preservation to survive in a meaningful way, The ACHP needs to working to counter, not encourage, this trend.

6. These draft recommendations should have been accompanied by a plan and schedule for their development, which identified future opportunities for consultation and engagement prior to publication of a final document. The import of the draft policy recommendations is such that I do not endorse continued development without more transparent and inclusive engagement of the historic preservation community.

Specific Issues

1. One of the bullets in the opening of the policy recommendations states that "nearly 125,000 federal actions are reviewed each year for their impact on historic properties." The assumption is that this refers to the number of annual reviews under Section 106, but this is not clearly stated. Furthermore, what is the meaning of this number and how was it derived? Does this number really reflect success as stated by the ACHP, or does it represent only a small percentage of the total number of annual federal actions? The reader has no context within which to evaluate this number without answers to these questions.

2. Challenges

- Developing public and political support – Is there in fact "*a general lack of widespread public understanding of and appreciation for the importance of historic preservation*" or is it that for many in the public historic preservation is not a primary value? An effective solution cannot be identified unless the problem has been accurately defined.
- Obtaining adequate and sustainable financial support - In discussing the former and current "*drivers*" for historic preservation, the draft policy recommendations note that "*economic growth will slow in developed countries*" and that federal historic preservation is subject to "*chronic underfunding*." The draft policy then notes that the challenge is to obtain adequate and sustainable financial support. In reaching an effective resolution the ACHP must first acknowledge that historic preservation is a luxury, not an essential government function or service that was more affordable in the late second half of the 20th century than it is today or will be in the future. Just like State Historic Preservation Offices (SHPOs) and Tribal Historic Preservation Offices (THPOs), static or shrinking federal agency budgets make it increasingly challenging for agencies as well to meet all of their responsibilities, including those under NHPA. It is doubtful that this situation will improve in the future so the ACHP should assume leadership in setting appropriate priorities and identifying ways to work smarter under the existing review process.
- Providing leadership and expertise – First, the ACHP must be more responsive to federal agencies need for a consistent and predictable bridge between the practice of Section 106 review and historic preservation policy. Second, I believe that what is lacking is not the number of professionals, but those with the requisite training and experience in Section

106 review specifically, and federal preservation generally. The problem is that most young professionals have themselves been trained in their colleges and universities by academicians who possess only limited practical experience with the requirements of NHPA and the regulations implementing Section 106 review. This is especially the case for archeology.

- Promoting inclusiveness – While the ACHP argues that "*a more expansive approach to significance is needed*," I believe that the tools already exist under NHPA and the Section 106 regulations to engage diverse communities and reflect their heritage. By its very nature, significance is a subjective construct that sometimes is applied too broadly and indiscriminately. Therefore, any expansion of its reach, no matter how slight, has the potential to strain the threshold. In the end, if everything is significant, Section 106 review will very quickly crumble under its own weight.
- Recognizing the full range of the nation's heritage – First of all, the National Register of Historic Places already possesses the flexibility to acknowledge the diversity of the nation's heritage. Second, as noted above, Section 106 review is not an academic exercise and cannot thrive in a free-for-all about "*intangible heritage*" and "*cultural values*." While such resources are excellent fodder for academic study and analysis, they do not lend themselves to a review whose accountability must be based on concrete evidence and clear boundaries.
- Improving preservation processes and systems – First, Section 106 review is already reasonably flexible to factor the value of a historic property to a community into federal decision making. Quite frankly, any proposed update of the Section 106 regulations to expand the existing protections likely will impede federal decision making and obstruct the expeditious conclusion of Section 106 review by obfuscating significance and confusing thresholds. Second, the draft policy recommendations suggest that elevating outcome over process is an acceptable objective. If the meaning of this recommendation is to promote a preservation outcome at the expense of properly "taking into account," then it does not comport with the purpose and policy of NHPA (as reflected in the former Sections 1 and 2) and ignores the vital influence of the public interest in federal decision making.
- Respecting the views and concerns of indigenous people – The ACHP's draft policy suggests that in practice the views of indigenous peoples are "*often overlooked or excluded.*" This assessment is suspect because it is impressionistic lacking any objective supporting data. While there certainly are instances where indigenous peoples' views are not respected, there are also instances where allegations of such disregard and exclusion immediately follow a decision by a federal agency, made within the legal limits of its authority, not to adopt the indigenous community's recommendation. The challenge is not one side or the other, but must reflect the impact of both.

3. Opportunities

- Democratizing preservation – There is no need to expand the concept of significance because there is already provide sufficient flexibility and opportunity. Furthermore, "*community engagement*" through consultation is already a hallmark of Section 106 review.
- Celebrating diversity – The ACHP suggests that recognition of diversity is only "*emerging*," but this allegation cannot be supported by the record. Furthermore, the Section 106 regulations already provide sufficient flexibility to incorporate the views of historic preservation professionals and well as those community members. Accordingly, the intent of this recommendation is unclear.
- Furthering collaboration – Section 106 promotes consultative decision making so by its very nature it encourages collaborative interactions
- Rethinking established preservation processes and systems - It is unclear why "*civic engagement*" is needed when the hallmark of Section 106 review is consultation. What are "*social impact processes*" and why would it be effective to integrate federal historic preservation with them?

4. In my opinion it would be ill advised to open NHPA or any historic preservation regulations for reconsideration and amendment at this time, particularly in the manner suggested by these draft policy recommendations.

**American Cultural Resources Association's Comments on**
**THE NATIONAL HISTORIC PRESERVATION PROGRAM AT 50:**
**CHALLENGES AND OPPORTUNITIES**

The American Cultural Resources Association (ACRA) welcomes the opportunity to provide comments on the Advisory Council on Historic Preservation's (ACHP) document discussing the challenges and opportunities facing historic preservation in the United States as part the 50th anniversary celebration of the National Historic Preservation Act (NHPA) (referred to herein as the "NHPA50 Report").

ACRA is the trade association supporting and promoting the interests of cultural resource management (CRM) firms in the U.S. ACRA's member firms employ thousands of cultural resources professionals and undertake many of the CRM studies and investigations in the U.S. Our firms actively promote best practices within the CRM industry to responsibly balance development and preservation. Accordingly, ACRA and its member firms have a strong interest in identifying and overcoming challenges facing historic preservation.

## General Observations

1. Sustainability

A central challenge moving forward is integrating historic preservation and cultural heritage work into the broader framework of sustainability – cultural, economic, social, and environmental. Preservation of historic structures can reduce landfill waste by reusing existing materials, reducing manufacturing or other costs associated with new construction materials, and assists in maintaining the historic character of local communities. A 2011 report by the National Trust for Historic Preservation found that "building reuse almost always offers environmental savings over demolition and new construction."[1]

The importance of sustainability is underrepresented in the NHPA50 Report. The historic preservation movement should connect its efforts with broader efforts to enhance sustainability.

2. Diversity of Resources and Stakeholders

The universe of sites included within historic preservation's awareness is continuing to evolve from buildings and lithic scatters to cultural landscapes that cover multiple ethnic heritages, site types, and political/socioeconomic jurisdictions. How we move forward with the identification, evaluation, and management of resources that do not fall within

[1] "The Greenest Building: Quantifying the Value of Building Reuse," available at http://www.preservationnation.org/information-center/sustainable-communities/green-lab/lca/The_Greenest_Building_lowres.pdf.

traditional conceptions will be a challenge. As a result, the importance of community-based preservation programs, cross-sector partnerships for effective preservation outcomes, and the need to address intangible resources within the NHPA Section 106 framework continue to grow. There has always been a focus on places (sites and buildings), and difficulty in conceiving of or acknowledging landscapes, non-artifactual items, certain structures, and natural places as having cultural significance. This will remain a problem in the next 50 years unless we address it now, and work to develop creative approaches to inventorying, interpreting, and managing landscapes. Our industry, the academy, tribal nations, and Native Hawaiian organizations, regulators, and other stakeholders should be regularly engaged in this topic. New remote sensing technologies and geodatabases will aid the identification and management process; however, we need to think of human activities and the associated landscape as a living and always evolving entity. Not all elements of a recognized landscape will necessarily remain static – we need to move beyond the concept of a "preservation park." ACHP should work with other agencies and partners (including ACRA) to review how landscapes and other places of cultural significance should be treated in the 21st century, including a review of approaches used in other countries (e.g., Australia) to see if their lessons can be applied in the United States.

With respect to the successes of the nation's historic preservation program over the past 50 years, the NHPA has accomplished more than the listing of 90,000 places of significance (as noted on p. 1). Countless additional places were found to be ineligible, or evaluated as eligible but never formally nominated, providing the nation with detailed history, data, and stories. Historic preservation has given a voice to hundreds of traditionally ignored communities, and provided a sense of place to countless local communities.

Finally, historic preservation needs a stronger push to connect to the nation's changing citizenry. According to the U.S. Census Bureau, by 2044, more than half of all Americans are projected to belong to a minority group (any group other than non-Hispanic White alone), and by 2060, nearly one in five of the nation's total population is projected to be foreign born.[2] As the population shifts, places that matter to minority groups need to be publicized as protected under the NHPA. The preamble to the NHPA (54 U.S.C. § 100101) provides a basis for developing a revised approach to history that reflects and celebrates both commonalities and diversities. Historic places are a powerful force for inclusiveness.

3. Leadership

Developing future preservation leaders and identifying opportunities for collaboration are increasingly important as we move beyond the world of public-private partnerships into a more complex array of players. The anniversary year and Preservation50 network present enormous opportunities to educate and develop a generation of leaders who view historic preservation as an integral component of socially responsible development. Leadership development will also help answer concerns about the loss of experienced cultural resource managers in agencies.

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[2] http://www.census.gov/content/dam/Census/library/publications/2015/demo/p25-1143.pdf.

To this end, ACRA is broadening its online education efforts to increase the audience of interested professionals, and to ensure that professionals in cultural resources are properly trained.[3] Our hope is that these efforts will increase the value of CRM companies by providing critical education to the membership and the CRM community at large. A similar effort by the ACHP and other stakeholders would help address the gap in preservation leadership.

**A Look at the Future**

1. A major challenge to historic preservation is the absence of a reliable, high-quality nationwide geographic and information database that would greatly facilitate the review and documentation process. The NHPA50 Report acknowledges that information and other technologies will continue to grow in importance (p. 1), but the reference is inadequately specific, and should include a reference to Geographic Information Systems and other digital capabilities (Google maps, broad and high-volume data sharing via the cloud) that allow for an integrated national database of cultural resources. These technologies would also positively impact the educational challenges referenced in the NHPA50 Report (p. 2). Preservationists will be better able to substantiate eligibility determinations by documenting, comparing, and quantifying in ways not currently possible. The Report should also acknowledge that in the near future, virtual reality will be a way in which people visit historic places.

2. While the NHPA50 Report acknowledges that there has been "insufficient attention to the cultural values and traditions—the 'intangible' aspects of heritage" (p. 2), it does not give sufficient weight to this problem. The analysis of traditional cultural properties (TCPs) fits well into the existing National Register system. However, identifying such places remains problematic, and TCPs continue to be discussed and evaluated by personnel ill-equipped to address TCP issues. The intangible heritage issue should be addressed more comprehensively through the formation of multidisciplinary teams which can address all facets of the human situation. These teams should include Native American and Native Hawaiian representatives.

3. The NHPA50 Report discusses several federal activities and other threats to the nation's historic resources, such as climate change, infrastructure development, and sprawl (pp. 2, 4). The Report should also discuss new threats arising with respect to the protection and preservation of historic properties:
   a. Development: A major challenge going forward is achieving a balance between development and preservation. We need to ensure that the preservation process provides cost-effective solutions and incentives that are meaningful to local communities and developers. This is the only way to generate public support and long-term funding.
   b. Undertaking: Developers are becoming very savvy about avoiding a federal nexus and Section 106, a problematic situation that could improve if agencies change their

[3] http://www.acra-crm.org/?page=Education.

notions of nexus and undertakings. We need to provide better information about the Section 106 process, and ensure that the process saves, rather than wastes, time and resources.

c. Security: Public access needs to be balanced against modern-day security demands. We need to protect iconic symbols of America, including places and objects that could be targets of interest by individuals or groups wishing to damage or destroy places, buildings, or structures of political, national, or cultural significance.
d. Effects: Current projects present concerns about the definition of the area of potential effects (APE), and addressing adverse effects appropriately. Adverse effects that may occur later in time or cumulative effects are often inadequately addressed.

4. The Report should focus more on the original intent of NHPA: to acknowledge that "the spirit and direction of the Nation are founded upon and reflected in its historic heritage," and to preserve "this irreplaceable heritage … in the public interest." 54 U.S.C. § 100101. Too often senior managers at many federal agencies do a poor job of remembering the intent of the NHPA, focusing instead on the bureaucratic process. All agencies should share a common definition of "undertaking" to make projects more predictable.

**Challenges**

1. ACRA agrees that "[t]here is a general lack of widespread public understanding of and appreciation for the importance of historic preservation to contemporary America" (p. 2). Current procedures remove the every-day citizen from preservation, by (a) relying too heavily on the application of National Register criteria in a rigid fashion, (b) acting as if only trained professionals are capable of evaluation, (c) failing to provide documentation relevant to the local community, and (d) producing documentation relevant only to fellow professionals. The historic preservation movement will continue to alienate the public if we do not integrate their perspective into the way in which we protect places, and if we do not balance community perspective with the NRHP criteria. More inclusiveness of interested parties is necessary, and stakeholder input should be sought and incorporated early and often.

   At the same time, much of the academic community is not sufficiently involved in historic preservation; consequently, the positive benefits of ongoing collaboration of the academic community and the preservation industry are not fully realized. Embracing this collaboration is essential for the development of creative strategies in an increasingly complex environment during the next 50 years.

2. The NHPA50 Report claims that "there are insufficient numbers and types of qualified and experienced practitioners (in both public and private sectors) in the various preservation fields." ACRA disagrees with respect to the private sector. CRM firms are located all over the U.S., and they employ practitioners with broad expertise in a wide variety of preservation fields. We estimate there are 10,000 preservation professionals

in the U.S., including architectural historians, historians, archaeologists, anthropologists, and an increasingly diverse group of other specialists.

Relatedly, the Report's understanding of "leadership" is overly restrictive (p. 2). The future leaders in historic preservation will work not only for the federal and tribal governments as well as state and local governments, but also for private practitioners, academic institutions, and non-profit entities. The Report references leadership only in connection with the federal government.

**Opportunities**

1. The opportunities appear to be unconnected to the Challenges. That is, challenges can present both roadblocks and opportunities to policy change and improvement, yet the opportunities in the NHPA50 Report are not connected to the challenges. For example, "Opportunities" might include leadership training and development directed to the historic preservation field.

2. ACRA agrees that public interest in historic preservation has decreased and that people care less now than when NHPA was passed. A much wider variety of issues occupies our time. We need to find a way to break through the chatter and make an impact to ensure historic preservation's future. These circumstances thus present both a challenge and an opportunity. Part of the challenge is the fact that historic preservation is viewed by many to be an obstacle to development of much needed infrastructure and public services. ACHP, ACRA and other preservation stakeholders should take the lead on providing reasonable proposals for streamlining the process before others provide their own solutions. Furthermore, the opportunity provided by the internet and social media offers a venue in which we may provide meaningful and interesting presentations to the public instead of the jargon-laden tomes that we produce for our fellow professionals. Public-friendly products are essential.

   Some specific ideas:
   a. Reverse the trend in K through 12 education, which short-changes historical and environmental studies. At the state level, historic preservation organizations should develop educational materials that better meet teachers' obligation to fulfill core curriculum standards.
   b. Broaden the use of historic sites that are open to the public to serve as community centers. Public archaeology programs have already been shown to do this well.
   c. Make all Section 106 project materials digitally available at community, state, region and national levels.
   d. Reinforce current practices that require meaningful public engagement in Section 106 projects wherever possible.

* * *

Again, ACRA thanks the ACHP for its work on the NHPA50 Report and for welcoming stakeholder input. Please do not hesitate to contact me or Marion Werkheiser at Cultural Heritage Partners PLLC, ACRA's government affair counsel, with any questions.

Duane Peter, ACRA President

Date: March 1, 2016

SAA

SOCIETY FOR AMERICAN ARCHAEOLOGY

March 1, 2016

The Honorable Milford Wayne Donaldson
Chairman
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637
NHPA50@achp.gov

Dear Chairman Donaldson,

The Society for American Archaeology (SAA) greatly appreciates this opportunity to provide the following input for the upcoming *National Historic Preservation Program at 50: Challenges and Opportunities* report. We congratulate the ACHP on embarking upon this important effort.

SAA is an international organization that, since its founding in 1934, has been dedicated to the research about and interpretation and protection of the archaeological heritage of the Americas. With nearly 8,000 members, SAA represents professional archaeologists in colleges and universities, museums, government agencies, and the private sector. SAA has members in all 50 states as well as many other nations around the world.

Archaeological sites are gateways to the past. They are storehouses of knowledge about the lives of those who came before us, and the world in which they lived. They embody cultural, historical, and traditional values that tie people to the land and speak to their place in the universe. They are also storehouses of knowledge on past environmental change – some quite extreme – and human responses to it. Archaeological sites are also extremely fragile: once damaged or destroyed, the information that they contain is lost forever.

The next 50 years for historic preservation will be very different from the previous half-century. We believe that the greatest challenge to cultural resources in the U.S. will come not from development projects, although these remain as potential threats, but from climate change and its impacts. Climate change poses a very serious threat to the hundreds of thousands of archaeological sites, both known and as-yet undiscovered, across the nation. Threats are most acute and obvious in coastal and other low-lying areas, where already sites in Hawaii and Alaska are endangered. Soon, those on the U.S. continental coastline will bear the wrath of tidal surges, wave action, and wind erosion, ultimately submerging under the ocean's waters, taking with them chapters of our common heritage, both historic and prehistoric. In other regions, fires, floods, and severe storms will become more intense and more frequent as the Earth's temperature increases, threatening inland archaeological resources. The loss of these irreplaceable resources will be a disaster for future generations of Americans who wish to learn more about the history of the continent, and for those whose historical, cultural, and spiritual identities are tied to these special places.

Only a strong federal historic preservation infrastructure will be able to mitigate the damage to archaeological and other cultural resources, but that can only happen if the federal program itself is geared toward meeting the threat. Thus, SAA urges the ACHP to make dealing with climate change one of the focuses of the report. One example that could be elaborated upon in the document as a positive step

to take is the administration's request in its FY2017 budget of funding for the digitization of the National Register of Historic Places documents. The long overdue securing of these records, which are at risk of damage from humidity, fire, and water, would ensure that at the very least, the documentation of our historically important places will be protected, even if some of the sites themselves are not.

SAA urges as well that ACHP lead the way toward development of a national or at least major regional database of archaeological and historic resources from existing SHPO databases, as well as enhancing digitization at the state level. This investment will pay off in allowing researchers to pinpoint sites most at risk, not only along coastlines but also, via sensitivity mapping, in regions liable to damage from destructive fires. Such national-scale knowledge will enhance our ability to wisely rank, mitigate, or protect those sites and buildings that offer us deep knowledge of our past.

We look forward to working with the ACHP as it moves forward with the development of the *National Historic Preservation Program at 50: Challenges and Opportunities* report.

Sincerely yours,

Diane Gifford-Gonzalez, Ph.D
President