

HISTORIC PRESERVATION AS A NATIONAL GOAL

The historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people.—National Historic Preservation Act of 1966.

To encourage realization of this goal the federal government has created many programs to protect our historic resources. Only part of the national historic preservation program, however, is the responsibility of the federal government. Also required is state and local, public and private, individual and organizational support to achieve preservation objectives. Nevertheless, federal leadership, as expressed by public laws and executive orders, does establish the priority of this goal in relation to other national goals, particularly those affecting the built environment. In addition, the activities of the federal government influence every historic preservation project in the United States. For this reason, an analysis of federal programs affecting historic preservation is needed to complete the picture of preservation activities in the United States. The discussion of supportive and contradictory programs leads, inevitably, to recommendations for continuing and strengthening the federal role in preserving historically significant places in the United States.

THE FEDERAL HISTORIC PRESERVATION PROGRAM

Examination of the federal historic preservation program requires delving into all aspects of the government in Washington. Neither budget figures nor National Park Service programs adequately indicate the extent of the federal commitment, nor the areas of conflict. The federal historic preservation program is established neither by a single act of the U.S. Congress nor in one government department. By law, the protection of historic places is the responsibility of every department and agency of the federal government.

Many federal programs provide funds and services for historic preservation projects. Problems arise, however, in locating and coordinating these programs. Often the activities of one department or agency will negate or adversely affect the preservation programs approved or undertaken by another federal office, even when it may be in the same department. In addition, programs that may affect or benefit historic preservation are so scattered as to make coordination by staffs difficult and programs

hard to explain to the public. Even more dangerous is the passage of federal legislation and the development of procedures that disregard historic places and thereby often undermine the progress being made by the protective programs also legislated by Congress.

In spite of this apparent lack of careful organization at the national level, the federal government is becoming more involved in historic preservation. Through legislation, it is regularly reinforcing its commitment to the protection of the built environment. The present federal responsibility within the national historic preservation program has been established by a series of laws in the 20th century which are discussed in the Utley-Mackintosh article in this publication. The first comprehensive preservation legislation was the Antiquities Act of 1906, which authorized the designation of national monuments and the protection of archaeological and paleolithic sites on public lands. Ten years later, Congress authorized creation of the National Park Service within the U.S. Department of the Interior. The National Park Service was the first federal agency specifically charged with preserving America's historic places. Almost 20 years later, the next major preservation law, the Historic Sites Act of 1935 declared a national policy of historic preservation and expanded the programs and authority of the National Park Service. Archaeological sites were given additional recognition by the Reservoir Salvage Act of 1960.

Current preservation activity is largely a result of the programs authorized by the National Historic Preservation Act of 1966. That law authorized programs such as the National Register of Historic Places, grants-in-aid to states and to the National Trust for Historic Preservation, and the creation of the Advisory Council on Historic Preservation. The Advisory Council administers a mandatory review of federal projects affecting historic places. The federal commitment to preservation was further increased by the presidential Executive Order 11593, Preservation and Enhancement of the Cultural Environment, issued May 13, 1971. That order, which required all federal departments and agencies to identify their historic properties, nominate eligible ones to the National Register and protect them from adverse effects, has resulted in a substantial awareness of cultural resources and historic preservation in governmental decision-making. Additional attention was given to archaeological sites by the passage in 1974 of the Archaeological and Historic Preservation Act, which expanded the earlier Reservoir Salvage Act. The 1974 law required increased site surveillance and funding for the recovery of archaeo-



The Old Post Office and Clock Tower, Washington, D.C. (1891-99), now stands vacant, but plans for the 9-story Romanesque Revival building include use as offices of the National Endowment for the Arts and the National Park Service's Office of Archeology and Historic Preservation, as well as commercial and theatrical revenue-producing uses on the ground floor. (Boucher for HABS)

Le Vieux Bureau de Poste et sa Tour d'Horloge à Washington D. C. (1891-99) est maintenant vacant, mais il est prévue d'utiliser ce bâtiment à neuf étages d'inspiration romane pour les bureaux de la Société pour la Dotation Nationale des Arts et pour les bureaux d'archéologie et de conservation historique du Service des Parcs Nationaux et aussi d'en convertir le rez-de-chaussée à des fins commerciales et théâtrales.

logical data and the recording of historic structures affected by federal construction projects. Together, these provisions make up the legal framework for responsibility of the federal government in national preservation programs.¹

Basically, federal responsibility in the national historic preservation program consists of identifying, recording, protecting and preserving historic places owned by the federal government. These activities are carried out by all federal agencies owning historic property, in accordance with procedures published by the Department of the Interior or other federal departments and agencies. In addition to preserving historic properties in federal ownership, the government stimulates private and public preservation efforts by protecting historic places from the adverse effects of federally funded projects, offering technical assistance and providing funds for locally initiated projects. In the 10 years since the historic preservation grants-in-aid program was authorized, \$72.5 million has been issued by the National Park Service to the 50 states and to the National Trust for Historic Preservation. This seed money is roughly equivalent to the amount the federal government spends in one year to comply with its own historic preservation responsibilities.

SUPPORTIVE FEDERAL PROGRAMS

The federal government administers many other programs that support the broad goal of historic preservation. The *Guide to Federal Programs*, published by the National Trust in 1974, described 229 programs, services and activities contributing to historic preservation offered by 49 permanent departments, agencies, boards and commissions of the federal government.² This list does not include any of the regular preservation responsibilities required of federal agencies by law; rather, it focuses on special programs that can be used to achieve the national preservation goal. The range of some of these federal programs is limited to special interests, historical research, museum collections, publications and other activities having little direct impact on the built environment. This is not true, however, of programs in four important agencies that contribute significantly to the success of historic preservation and reinforce federal activities to protect the American heritage.

Through the Transportation Act of 1966, the Department of Transportation requires any federally assisted transportation project that affects public park and recreation areas, wildlife and waterfowl refuges and historic sites to give special consideration to protecting and minimizing any harm to these areas. Because of the commitment of federal funds to interstate highways and to many state and local transportation projects, many historic places have been protected by this requirement. In addition, the provision has brought attention to historic places that might have been destroyed by transportation plans and has involved the Secretary of Transportation in preservation decisions. Ideally, preservation-transportation issues should be worked out at a local and state level. In some cases, however, these issues must

be decided by the federal government. One of the most famous cases of this type was in 1968, when the waterfront expressway proposed for New Orleans was determined by the Secretary of Transportation to be damaging to the Vieux Carré historic district, and federal funds for that road were denied. In more recent cases, the procedures for Advisory Council review of transportation projects have resulted in earlier decisions and in mitigating some of the adverse effects of proposed construction. Recourse to decisions by the Secretary of Transportation is only through court action, which is slow, not always completely equitable and therefore often avoided by citizens at the cost of our historic resources.

Residential architecture such as the David G. Raney House in Apalachicola, Florida (c. 1838), has received assistance from HUD for preservation plans and conservation procedures. (Library of Congress)

L'architecture résidentielle, telle que l'illustre la maison de David G. Raney (aux environs de 1838) à Apalachicola en Floride, a reçu l'assistance de l'HUD afin de concrétiser les projets de protection et de conservation.





In Manatí, Puerto Rico, the National Endowment for the Arts and Humanities and the International Centre in Rome funded a survey of the historically significant district and proposed restoration work, such as that needed for this abandoned commercial building. (Tashina Tarr)

A Manatí, Puerto Rico, la Société pour la Dotation des Arts et des Humanités et le Centre International de Rome ont fondé un cadastre de ce quartier d'importance historique et ont proposé les travaux de restauration que nécessitait cette bâtisse commerçante abandonnée.

The second supportive federal program is the review regulation in the National Environmental Protection Act of 1969 (NEPA). This law is administered by the Council on Environmental Quality, a federal board. Under NEPA, all federal agencies undertaking a project affecting the environment must prepare a detailed analysis, the environmental impact statement, that considers the effects of the project on the historical, cultural and natural aspects of our national heritage. These requirements reinforce those of the National Historic Preservation Act and have made federal agencies increasingly aware of the ways in which projects and programs can alter historic places. If the impact assessments are not factual or complete, however, irreversible damage to cultural property can result.

The third supportive program is in the General Services Administration (GSA), which manages federally owned buildings and deals directly with historic structures not

operated as monuments. Since 1949, GSA has been permitted to transfer historically significant federal surplus properties to state or local governments at no cost, if the buildings are to be used for nonprofit museum purposes. In 1972, Congress decided that surplus property transferred for historic monument purposes could become revenue producing. Profits from such activities must be applied to public historic preservation, park or recreational projects. Through this program, state and local governments have been encouraged to preserve historic structures, many of which are large office buildings, courthouses and post offices built in the late 19th or early 20th centuries.

The potential for preservation by GSA was further expanded in 1975 by a program that permits the agency to acquire and adapt old buildings for federal offices. This program gives the federal government an opportunity to demonstrate leadership by making sensitive



and innovative use of its existing building stock. Through this and other GSA preservation activities, many structures that have made a significant impact on the appearance of our American cities have a better chance for survival.

Fourth are the programs of the Department of Housing and Urban Development (HUD). HUD does not own property, but through its programs probably has greater influence on the appearance of the built environment than any other federal agency. As part of its concern for housing and planning, HUD has been involved in historic preservation for more than 15 years. In 1974, the Housing and Community Development Act reiterated the concern of Congress that HUD programs should encourage historic preservation. Prior to that, HUD already had had extensive experience in funding preservation projects through individual grant programs, many of which were replaced in 1974 by Community Develop-

Bushkill Mill, the Peter House Hotel and St. John the Evangelist Episcopal Church (next page) were three of more than 150 structures of historic or architectural merit threatened with destruction by the Delaware Water Gap project, a federal program to create a reservoir that would have flooded parts of Pennsylvania and New Jersey. (George Eisenmann for HABS)

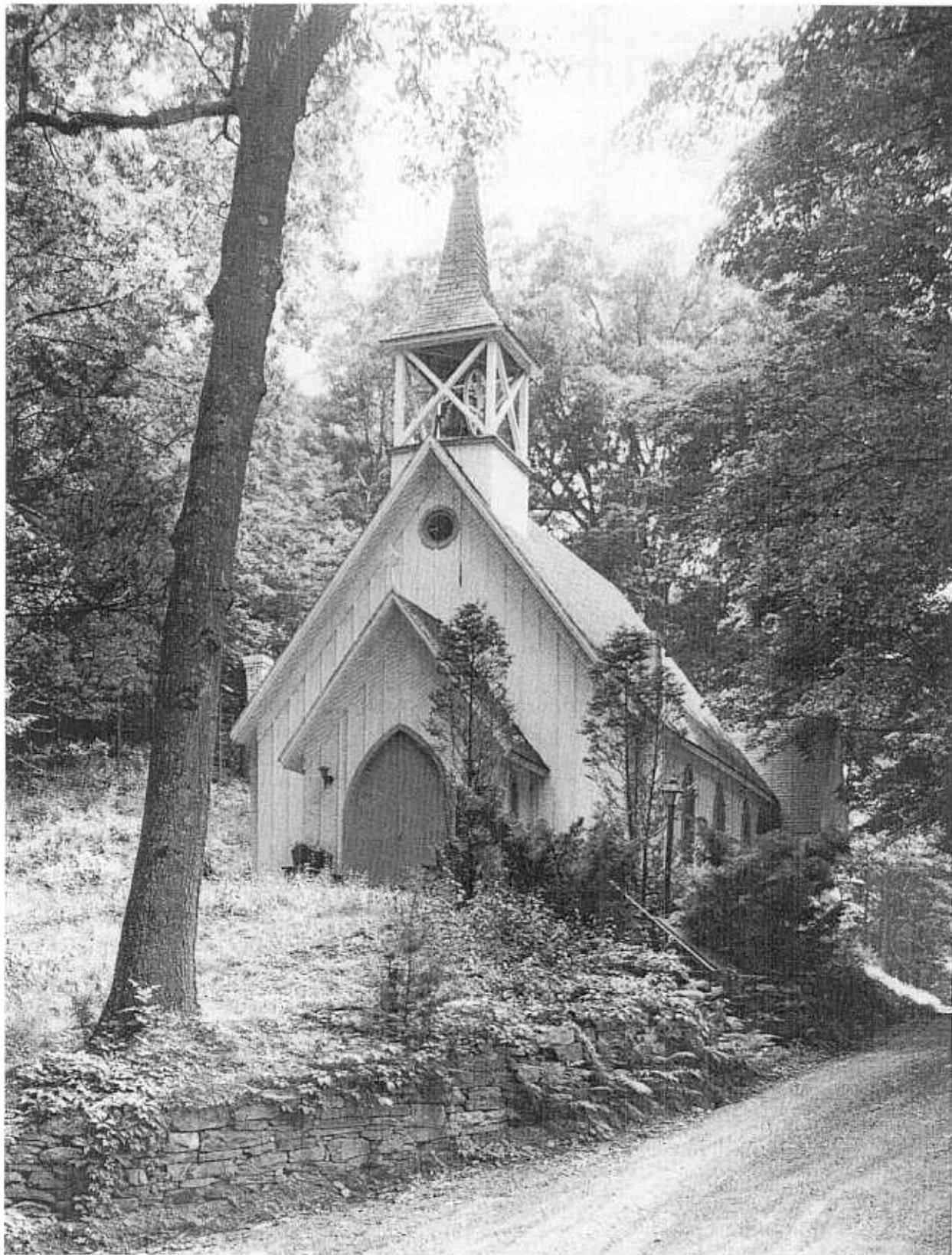
Le Moulin Bushill, l'Hôtel Peter House et l'Eglise Episcopale de Saint Jean l'Evangeliste (voir page suivante) comptaient parmi les quelques 150 constructions de mérite historique et architectural menacées de destruction par le projet d'une trouée d'eau dans le Delaware—programme fédéral de créer un réservoir qui aurait inondé des parties entières du New Jersey et de la Pennsylvanie.

ment Block Grants. Almost any preservation project that a state and local government wants to undertake can be eligible for funds from the annual HUD block grant. In the first year of the program, 80 preservation projects were funded; their activities included revolving funds, repair of historic municipal buildings, restoration of the steamboat *Nenana* in Alaska, rehabilitation of properties and neighborhoods and many historic resource surveys. In addition, HUD has made grants through the Comprehensive Planning Assistance Program to local and regional planning bodies for preparing the historic preservation component of their comprehensive plans. For example, the Apalachicola, Florida, historic preservation plan identified significant indigenous residential architecture and outlined techniques for conserving it. Through these HUD programs, preservation thus becomes part of urban revitalization.

HUD has also made grants solely for historic preservation purposes. Among these were grants to the National Trust for Historic Preservation for the following: production in 1966 of a movie, "How Will We Know It's Us?"; a study published in 1974 of development rights transfer techniques applied to landmark preservation; and, in 1974, a two-year project to prepare a directory of historic commissions and a handbook on establishing and administering both landmark and historic district commissions.

An internal HUD project was the 1975 publication, *Neighborhood Preservation, A Catalog of Local Programs*. Although HUD allots funds for this type of special project, it does not maintain a staff to provide technical services to stimulate or guide the preservation efforts of grant recipients.

Closely tied ideologically to historic preservation is the work of the National Endowment for the Arts and Humanities (authorized by the National Foundation on the Arts and Humanities Act of 1965, as amended). The Endowment's Federal Architecture Project has made recommendations on the adaptive use of federal buildings, some of which have already been adopted by GSA. The Architecture & Environmental Arts Programs of the Endowment distributed more than \$1 million during fiscal year 1976 for more than 39 projects related to historic preservation. In particular, a number of projects funded by the National Theme Awards Program have encouraged a variety of preservation efforts.



A comprehensive survey of Manatí, Puerto Rico, was funded in 1974 in cooperation with the International Centre for Conservation, Rome. This was a laudable effort to bring international attention to a specific preservation planning activity, but to date the project has yielded little information for general use. Of more immediate assistance was the Neighborhood Conservation Conference in 1975, which helped unite the concerns for better housing and good neighborhoods with preservation of historic architecture. Endowment grants to private groups have helped accomplish much important preservation work and thus bolster support for protecting architecturally significant structures. For example, one grant enabled Waterford, a small Virginia village, to develop a program of scenic easements to protect the rural setting of its historic district, a national historic landmark.

These supportive federal programs are commendable in that they afford special opportunities and encouragement for preservation efforts. The programs do not, however, represent a continuing federal commitment to any specific preservation objective. Program funds are usually for unique and often demonstration-type projects that are undertaken over a short period of time with limited objectives. Cities, counties, states and eligible organizations must compete for each grant separately. In addition, there is little assurance that funds available one year for a particular type of project will still be available the following year. In fact, an agency may be unable to fund historic preservation when other activities demand priority for political or administrative reasons.

The influence of these federal programs should be much greater than the funds allocated for any one project. From the federal point of view, the grant is an investment to stimulate other sources of assistance. At the other end, there is prestige associated with being a grant recipient that is a stimulus for the involvement of others. In addition, a grant is considered to be recognition by a federal agency of the significance of the historic project involved. In these ways, the federal government influences and guides a great variety of small preservation projects and consequently determines many preservation priorities.

CONTRADICTORY FEDERAL PROGRAMS

Although federal agencies are currently spending more time and money on historic preservation, there are still areas of conflict between the federal preservation activities and other federal programs. One type of conflict is found in specific projects that adversely affect historic places and where there is disagreement about the implementation of techniques to minimize those adverse effects. The other conflict exists in federal programs where legislation has led to procedures that do not include protection of historic places.

In the first type, many of these conflicts can be arbitrated and reduced through existing federal review regulations. Many federal offices give high priority to preservation and work hard to mitigate the impact of the environmental changes on historic places. With the second type of conflict, however, there is a greater poten-

tial for undermining preservation efforts. Constant vigilance is necessary to spot areas of conflict and alert Congress of the need to include a policy for protecting historic places in the proposed legislation.

The classic case of failure to protect historic places affected by a federal program is the Delaware Water Gap project. The Flood Control Act of 1962 authorized construction of a dam on the Delaware River that would create a reservoir of approximately 4,900 hectares (12,000 acres). The U.S. Army Corps of Engineers was authorized to acquire land for both the dam and reservoir. On September 1, 1965, the enactment of Public Law 89-158 authorized the Delaware Water Gap National Recreation Area for "public outdoor recreation use and enjoyment of the proposed Tocks Island Reservoir and lands adjacent thereto by the people of the United States and for preservation of the scenic, scientific and historic features contributing to public enjoyment of such lands and waters." This recreation area of more than 70,000 acres, including the reservoir, was to be administered by the National Park Service as a unit of the park system.

As a result of these two laws, two federal agencies were authorized to acquire land in the Delaware Valley for what was intended to be a regional improvement project that would include the preservation of historic structures and sites. An early survey within the proposed park identified more than 150 structures of historic or architectural merit, as well as many historic and archaeological sites, trails, roads and canals. More than half of those identified were within the flood zone; however, initial planning included methods of mitigating the loss of this cultural property by salvage or relocation.

At the same time, local citizen groups and national environmental organizations were challenging the feasibility of the dam and the desirability of flooding the Upper Delaware River Valley. As the dam issue raged, funds for construction were withheld but land acquisition continued. Land acquired by the Corps of Engineers was transferred to the National Park Service for general management. The General Accounting Office determined, however, that the National Park Service could not expend monies authorized by the recreation area on lands or buildings purchased by the Corps of Engineers. As a result, the historic properties and sites acquired in the flood zone remained vacant and without protection or maintenance, pending the future of the dam and a decision on their demolition, salvage or relocation. With the indecision accompanying the dam construction and the resulting slow development of the park, historic preservation funding for National Park Service properties was a low priority. Many of these vacant buildings were subject to rampant vandalism, including arson and the stripping of architectural elements. In other cases they were closed up and allowed to weather and rot away.

For more than 10 years this process continued. In 1975, decisions were made by the agencies and organizations involved not to build the dam within the immediate future, and legislation was introduced in Congress to deauthorize construction of the Tocks Island Reservoir. At the same time, public indignation was aroused by the

loss of the historic structures purchased by the government. The National Park Service undertook a new preservation program to begin emergency maintenance on the major historic structures within the recreation area. Unfortunately, numerous buildings and significant historic fabric have now been lost forever, and many operating farms and resort hotels are gone. Land-use patterns reflecting human settlement dating from Indian occupation of the Upper Delaware River Valley have been changed irreversibly by the aborted plans for the dam and some of our heritage has been lost forever.

From such examples, it is apparent that the review authority provided by the National Historic Preservation Act of 1966 is ineffective in the face of a higher priority project, such as the provision of energy or water resources. The Corps of Engineers continues in many cases to disregard the disruptive effect of its dam proposals on the life of historic properties. Citizens in historic villages and farms along the Catoctin Creek, one of the Virginia tributaries of the Potomac River, expect to battle for at least two more years Corps of Engineers dam proposals that would flood their area, which includes the Waterford historic district mentioned previously. A similar public utility project threatened the historic and prehistoric valley of the New River and lies on the Virginia and North Carolina boundary. The Federal Power Commission proposed construction of a giant hydroelectric dam that would have flooded the valley, thereby destroying an area containing the second oldest river in the world and a settlement pattern little changed since the 18th century. Congress, however, voted approval of a bill during the summer of 1976 to prohibit construction of the giant project; the bill was subsequently signed into law by President Ford.

Even GSA, despite its preservation responsibilities, has disregarded the federal review process in some of its construction programs in the past decade. In March 1974, this agency began demolition of three Washington, D.C., buildings that the Department of the Interior had determined 10 days earlier were eligible for the National Register. Thus the demolition of the structures two weeks later violated federal review regulations. Such examples illustrate the low priority that the national preservation goal has in many federal decision-making processes.

The second kind of conflict between federal programs most often exists when Congress authorizes regulatory or grant programs that have a broad influence on the built environment. In those cases it is often difficult to realize the potential for harm to historic structures until procedures are written. The federal law for a barrier-free environment is an example of regulations potentially detrimental to preservation. In 1973, the Architectural and Transportation Barriers Compliance Board was established by Congress to implement provisions in the Architectural and Transportation Barriers Act of 1968 (PL 90-480). One of the Board's objectives is "to provide access to the handicapped of our National Parks and National Monuments." By implication, an elevator or ramp should be installed in Independence Hall and other federally owned historic places. In fact, this has

been done at the Jefferson Memorial and Lincoln Memorial in Washington, D.C. The effect of such an alteration is different for a large monument, however, than for a small and fragile building, especially one where historic significance is closely linked to preservation of the architectural fabric.

Cooperation between the Advisory Council on Historic Preservation and the Occupational Safety and Health Administration (OSHA) may reduce the possibility of a conflict that was created with passage of the Occupational Safety and Health Act of 1970. The objective of this act was "to develop, promulgate and enforce occupational safety and health standards for every place in the United States employing one or more persons." This law regulates standards for workers' safety in terms of both their tasks and the structures in which they work. An example of the comprehensive impact of the OSHA regulations is the effect on historic industrial processes that have become significant as illustrations of earlier



The Old Patent Office, Washington, D.C. (1838–57), now provides offices and galleries for the National Collection of Fine Arts and the National Portrait Gallery of the Smithsonian Institution. The Victorian interior of the third floor has been restored. (National Portrait Gallery)

Le vieux Bureau des Patentes à Washington D. C. (1837-67) fournit en ce moment des bureaux et des galeries à la Collection Nationale des Beaux-Arts et à la Galerie Nationale des Tableaux de l'Institut Smithsonian. L'intérieur victorien a été restauré.

The Old Patent Office c. 1855, as depicted in a lithograph by E. Sachse & Co., Baltimore. (National Portrait Gallery)

Le vieux Bureau des Patentes c. 1855, d'après une lithographie de E. Sachse & Co., Baltimore.



and often innovative technologies. Forced to raise the safety standards at a plant, an owner may find it necessary to abandon the older equipment, machinery, structures and buildings. Few small industries can afford to maintain a museum and its historic equipment; thus their work processes will be abandoned and eventually lost. An example is the Tremont Nail Factory in Wareham, Massachusetts, which has been manufacturing cut nails since the early 19th century. Compliance with OSHA will require construction of a new plant and mean the loss of old buildings and equipment that the owner cannot afford to maintain as a museum.

Although federal programs are specifically exempt from OSHA, a program comparable to OSHA's is required for federally owned property. Thus, application of the safety and health regulations of individual federal agencies may mean that stairways, interior courtyards with skylights, balconies and other architectural features are considered fire hazards and may be altered in a manner detrimental to the architectural integrity of the original design. GSA has a policy guideline that permits administrative procedures to mitigate the personal safety hazards, but in some cases the regional safety officer or building manager may insist on physical changes in a building.

A similar situation exists in the Critical Bridge Program of the Department of Transportation (DOT). A DOT survey of bridges carrying highways built with federal aid identified many bridges that should be replaced because of structural obsolescence. Although many of these bridges are early examples of engineering and are significant cultural resources, DOT evaluated them only in terms of highway construction and safety.



Consequently, demolition and replacement were not considered to have adversely affected historic property. Only through the vigilance and public education programs of the Historic American Engineering Record are the federal review requirements now being followed in the case of these bridges.

Two grant programs where conflicts exist are the Environmental Protection Agency's (EPA) sewer program and HUD's flood insurance program. Failure by EPA to consider the possibility of sewer lines being laid through archaeological sites has resulted in many of them being destroyed. In the case of flood insurance, Congress specified that a building must comply with Corps of Engineers floodproofing standards in order to be eligible for this HUD program. By the end of 1975, HUD had identified 16,000 communities eligible if all the owners complied with the requirements. The standards require complete waterproofing including water and vapor barriers and elimination of all cracks, breaks or openings through which water could pass. The effect of compliance on historic structures could be sufficient to significantly reduce their historic value. Fortunately, HUD and the National Park Service have been able to develop procedures whereby properties on the National Register are exempt from the Corps of Engineers standards. These procedures, however, do not protect the many buildings whose historical significance has not yet been officially recognized or those that contribute to the character of a historic area. In those cases, the expense of complying with the floodproofing standards may be sufficient reason for demolition by an unsympathetic or indigent owner.

Even more detrimental and pervasive is the conflict between investments in preservation and the tax laws of the Internal Revenue Service of the Department of the Treasury. There is no incentive for historic preservation, and, as pointed out by other authors in this issue, the tax laws actually favor rapid depreciation of a building's economic value, demolition and new construction. In the last few years, there have been bills in Congress to amend the tax laws, but none has been passed. These tax regulations are currently perhaps the greatest disincentive for the preservation and maintenance of privately owned historic properties. Amelioration of this issue has been attempted by some states and cities, but new federal tax laws are still missing. Until changes are made in these tax laws, achievement of the national preservation goal is significantly thwarted.

Quality control in the preservation-related activities of federal agencies is another problem. Both the Office of Archeology and Historic Preservation in the National Park Service and the Advisory Council on Historic Preservation willingly review draft material voluntarily submitted by other federal agencies. There is no requirement for such a review and the information given the public by many agencies is often repetitive, inaccurate and sometimes anti-preservation. Recently, the Department of Agriculture published and distributed to the public two publications, "New Life for Old Dwellings," and "Renovate an Old House." These booklets contain guidelines for repair and maintenance that could destroy the architectural character and style of many historic farm-

The St. Louis Post Office, St. Louis, Missouri (1874-82), is a 19th-century federal office building anticipating a new use. Originally the United States Court House, Custom House and Post Office, by the early 1960s it had become vacant. The U.S. General Services Administration is developing a prospectus for restoration, renovation and adaptive use of the building for office space for federal tenants. (Piaget for HABS)

Le Bureau de Poste de St. Louis à St. Louis dans le Missouri (1874-82) est un bâtiment fédéral du XIX^e siècle pour lequel il est prévu une nouvelle utilisation. Tout d'abord Palais de Justice des Etats-Unis, puis Maison des Douanes et Bureau de Poste, devenu vide au début des années 1960, il est considéré dans un projet de restauration de l'Administration des Services Generaux des Etats Unis—projet de renovation et de réadaptation du bâtiment en bureaux pour des locataires fédéraux.



houses. The drawings show nonarchitectural solutions to many alterations and additions, along with a disregard for the value, both real and aesthetic, that can accrue to rural buildings with the passage of time. Although the Advisory Council on Historic Preservation has informed the Department of Agriculture of the detrimental aspects of these guidelines, the publications have not been recalled.

Some of the conflicts in federal preservation priorities exist even in the undertakings of the National Park Service. Although 167 or two-thirds of the units of the national parks system are historic sites, the National Park Service often fails to focus on the broad needs of historic preservation in these parks. There have been instances where park managers have demolished or neglected historic structures they thought were intruding on recreational or natural values, or were in conflict with more visible aspects of the parks program. Examples of such disregard include the removal of mountain homesteads, log cabins and grist mills in Shenandoah National Park, Virginia, from the late 1920s up to the 1950s, and more recently the neglect of the cabins of the five Walker sisters, who lived very much like the original settlers in the area acquired for the Smoky Mountain National Park in North Carolina and Tennessee. On

October 10, 1968, the director of the National Park Service had to admonish the park personnel not to permit historic structures to be neglected or demolished and to be more creative in maintaining these structures.

Other problems exist that often obscure the role of the Department of the Interior, the National Park Service's parent organization, as the official preservation office. Despite the fact that preservation professionals in the National Park Service are dedicated to their tasks of preserving historic park structures, determination of the preservation policy is often made by staff trained primarily in park management rather than in architectural conservation. Although the Office of Archeology and Historic Preservation is part of the National Park Service organization, its programs are directed to all federal agencies and state and local governments. In addition, approval by Congress to expand the National Register and increase the role of the Advisory Council is in conflict with executive directives to the Office of Management and Budget (OMB), which oversees the budgets of federal departments and agencies, to reduce spending for federal programs. Efforts to cut back the size of the federal government in terms of money and personnel directly affect the activities of the Office of Archeology and Historic Preservation, where there is a daily increase in the demand for assistance at all levels of the federal preservation program in order for federal agencies to comply with Executive Order 11593. Caught in these dilemmas, our historic resources become victims of fragmented national policy and shifting priorities.

Another frustration for preservationists is the problem of agencies that lack the authority to spend funds for historic preservation objectives, even when program administrators are sympathetic to those goals. The U.S. Army Corps of Engineers maintains many historic military buildings and structures, but the budget for many installations does not permit expenditures to maintain historic building materials that are different from modern ones. This means that replacement materials are often used that have a detrimental effect and cause accelerated deterioration of the historic structure. In cases where historic preservation is not an eligible agency expense, a congressional amendment is often needed to change the eligibility requirements to permit preservation activities. Equally frustrating are the cases where sufficient funds have not been allocated for agencies to comply with Executive Order 11593. Each federal agency requiring funds to comply with this directive from the White House must request them from Congress. Internal conflicts of this nature can affect preservation projects all around the United States.

Critical also is federal staffing, the key to a bureaucracy's productivity. This takes on particular significance in preservation programs where subjective evaluations based on education and maturity are as vital as objective evaluations based on authorized procedures. Preservationists have been fortunate in that the top administrators of the federal preservation program have been intellectually committed to their work. However, as programs expand and become more encumbered with detailed

procedures, agencies may tend to hire staffs that can work with the procedures rather than the subject matter. The problems of staff reviewing material for which they do not have adequate background is exacerbated by personnel decisions based on policies to economize that establish positions at salaries too low to attract enough experienced and well-educated professionals willing to make a career in the federal preservation program. As a result, decisions affecting historic places may be made by staff review for compliance with procedural criteria rather than on substantive content. Preservationists should realize that loss of a historic place may be caused by an inadequately staffed federal office rather than lack of commitment by a local government or organization.

UNDERUTILIZED FEDERAL PROGRAMS

There are many existing programs offered by the federal government that can be used to advance national preservation goals. The most obvious are grant programs authorized for a general objective that can include preservation goals. Other assistance is available through regulatory programs and projects where a percentage of funds is allocated for preservation purposes. Lack of public knowledge and understanding often results in these and other opportunities for protecting historic places being lost.

Underutilized programs offering an opportunity to protect historic places do exist in several agencies. GSA has procedures to encourage the use of historic structures by both the government and by state and local organizations; these programs can give new life to buildings representing the best of the large and originally innovative office buildings of the late 19th century. HUD provides funds through the Community Development Block Grants program mentioned previously. Many types of local projects that can contribute to preservation objectives are eligible for this grant money. HUD has done little, however, to show local governments how such funds can be used to accomplish preservation objectives as part of a community's broad urban revitalization and improvement programs.

Opportunities for advancing the national preservation goal also exist in federal programs with primarily economic goals. For example, the U.S. Commerce Department's Economic Development Administration provides funding assistance for businesses to improve their facilities. If the business is in a historic building, improvements can also be used for preservation and maintenance of the structure. Similarly, the Small Business Administration (SBA) lends money for certain business owners to make improvements to their property, whether old or new. The size of the possible loan through SBA is much greater than through the Economic Development Administration. In addition, the Comprehensive Employment and Training Act, administered by the U.S. Department of Labor, authorizes grants to states and local governments for programs to stimulate job skills. The skills can be those of restoration carpenters and craftspersons as well as machinery operators and mechanics. A few individuals and organizations have designated

imaginative and innovative preservation programs to meet special needs. However, the lack of a federal clearinghouse describing such programs is a handicap; thus diligent sleuthing is necessary to exploit the whole range of tools available for meeting preservation goals. Preservationists should make these federal programs better known to local government decision makers. Then, as these programs are used, the procedures and administrative techniques that now often frustrate inexperienced preservationists will be better developed for preservation projects. In the meantime, unused programs represent a loss of opportunity that could be critical to a preservation project.

EVALUATING FEDERAL PRESERVATION ACTIVITIES

If preservation of historic America is a national goal, is the federal government's effort adequate to realize that goal? The answer is no. This is not to say that the federal programs are not moving in the right direction, but rather to point out that at the present level, little will be accomplished. A review of the federal preservation programs shows how their goals as well as the national policy are jeopardized, contradicted and unrealized. This finding indicates that the federal government's commitment to preservation is still in its adolescence. To develop a mature, comprehensive preservation policy, current weaknesses must be bolstered and recognized strengths given the security of tenure.

One weakness in our national policy is the fact that there is no official definition of a national historic preservation goal. Goals, however, have been described for the National Trust for Historic Preservation,³ which is not a federal agency and for an individual project, such as the preservation component of the Pennsylvania Avenue Plan, which is federally financed and for specific programs, but objectives have not been developed or refined into a comprehensive nationally accepted preservation goal.⁴ A lack of federal preservation goals has been reflected in the separation of architectural restoration and urban or neighborhood conservation, and of battlefield preservation and nature conservation. This has led to a situation where some cultural resources are eligible under one preservation program and not under another, although the ultimate goal may be the same in both cases. Similar separations exist where preservation is defined by some agencies as a curatorial task and by others as a method for the continuation of the economic and cultural life of a property. This divided view has often resulted in the exclusion of historic places from land development programs. By setting goals and formulating clear definitions, the federal government could overcome some of the above problems and could strengthen its leadership role vis-à-vis state and local preservation activities.

In spite of shortcomings, recent federal policy has brought preservation to almost every part of the federal bureaucracy, both through review procedures and the increasing number of programs for which preservation is an eligible expenditure. The advantage of this decen-

tralization is the increase in preservation awareness in every federal agency. Each has a representative responsible for the agency's compliance with Executive Order 11593 and the National Historic Preservation Act of 1966. In some cases, these agencies own or control enough property to make it necessary to delegate one or more staff members to a "historic preservation" office. This action encourages the public to look to that staff for information and accountability. Thus, the United States government is making its way, sometimes slowly and awkwardly, toward recognition of the significance of the country's historic places.

As federal involvement in preservation grows, program activities increase and staffs become aware of the broad intent of the preservation laws. The Advisory Council and the Office of Archeology and Historic Preservation, for example, are increasingly providing information and guidelines on numerous aspects of historic preservation. Especially noteworthy are recent publications of the Office of Archeology and Historic Preservation, *Cyclical Maintenance for Historic Buildings* and the series of *Preservation Briefs* on technical aspects of preserving historic building materials.

Simultaneously, Congress has been proposing legislation for more new programs. Since January 1975, more than 19 separate bills sponsored by more than 100 members of Congress, have been introduced for consideration.⁵ Proposed legislation includes the following: Creation of a National Historic Preservation Fund, a method of financing preservation projects through revenues obtained from outer continental shelf oil and gas leases; authorization of grants to communities to renovate unused and often historic school buildings; an amendment to the Internal Revenue Code to encourage the preservation and rehabilitation of historic buildings and structures; a program making unused rail passenger depots available for cultural centers; establishment of National Historic Trails.

The effect of these programs, if approved, would be varied. Many of them will have little impact on the built environment, while others have the potential of giving preservation a higher priority in public and private decision making. In order to make preservation a real choice in America, these bills must be only the beginning of recognition and definition of the federal role in safeguarding our cultural heritage. The danger is that this recent legislative activity may only add to the jumble of programs if the new provisions are not adequately funded and accompanied by leadership, direction and qualified personnel—ingredients the federal government has been reluctant to add to its national preservation program.

RECOMMENDATIONS

The federal government can do much to increase the chances of our historic places being protected for posterity. In a democracy, a national program is conceived as being a federal-state-local partnership, but Americans have come to look more and more to the federal partner for leadership. This does not necessarily mean funding,

but rather a sense of direction through legislation, example and the personalities involved. An illustration of the third factor was the influence of Mrs. Lyndon B. Johnson in beautifying the country. The positive ideas of a few scattered garden clubs suddenly became a national movement with her enthusiastic leadership.

Historic preservation is a complex issue, and more than just a charismatic leader is needed, but any recommendations will depend on "personalities" and the commitment of professional preservationists. Given leadership, funds and long-term goals, there must also be an evaluation of the activities and programs where the federal government can be the most effective agent for preservation. The following recommendations are offered for initial efforts:

First, the federal government should offer more incentives for preservation. One way this can be accomplished is by providing funds that generate investment in preservation projects. Specifically, federal funding should be available for projects that exceed the resources of local governments or private groups. Such funding is already accomplished through the National Register grants-in-aid and through many demonstration-type grant programs, but additional preservation funds are needed. Also, many historic places need continuing economic support, rather than one-time grants. Funds tied to the life of a structure rather than to a specific owner may be necessary in some cases.

Other incentives, in lieu of funds, are loans, mortgage guarantees and tax incentive provisions. Federal guarantee programs will stimulate local government efforts of that kind, just as federal funds stimulate local investments; the assurance of federal backing or sanction is adequate security for many investors. Similarly, changes in personal federal income tax regulations with regard to building depreciation allowances can help make preservation an economically more attractive alternative and reduce the advantages of demolition.

Still other incentives are less directly related to funding. For example, there is need for a clearinghouse of programs and technical services. Currently, no federal agency is adequately staffed to handle the public demand for information about federal historic preservation programs and opportunities. Frustrations caused by the time, energy and money consumed in trying to locate information should be minimized. In addition, technical information and procedures should be readily available to encourage the appropriate application of preservation technologies and methodologies.

Creation of a federally funded national preservation center or institute could encourage considerable activity in the field. The present decentralized administration of preservation review activities is beneficial in that it assures the existence of preservation personnel in every federal agency. Also important, however, is a preservation center to support that personnel and provide a physical as well as administrative structure for distributing information. Such a center should be able to undertake and coordinate broad research programs and training involving investigation of methodologies, analysis of building technologies and historic materials, development of substitute new materials, community projects and related topics. The

concept of creating such a center in Philadelphia was developed in 1968, but the funds provided to the National Park Service for initial expenses were used at the last moment for another activity. Thus, an important preservation project was short-changed as a result of low political priority.

A federal preservation center could offer incentives by undertaking actual projects, demonstrating techniques and various approaches. Currently, the National Park Service has two training centers that offer in-service training on managing historic properties and developing sensitivity to historic materials. On-the-job training is provided at Harper's Ferry, West Virginia, and on the Chesapeake and Ohio Canal in Maryland. However, these are not structured programs and the number trained is small. More is needed, particularly for large and urban historic properties. The federal government already owns many buildings that would be ideal for training and demonstrating preservation techniques.

The availability of education on all aspects of preservation is an important incentive that the federal government can encourage. Appreciation of the built environment can be a part of school programs for all ages, and adults can learn do-it-yourself techniques to assist preservation programs. Dispersed throughout the existing educational system, such programs can stimulate new approaches to protecting cultural resources.

Incentive also comes from knowledge of the United States commitment to preserving the heritage of other countries. Continued support of the programs of ICOMOS, the International Centre for Conservation, Rome, and the World Heritage Convention help identify our concern for saving such places as Cuzco, Peru; Aix-en-Provence, France; Goreme, Turkey; Kathmandu Valley, Nepal and other cultural resources.

For all the incentives the federal government can offer, it is still necessary to have regulations that guarantee certain minimum standards. Many of the present loopholes in the review regulations of the national historic preservation program must be eliminated. For instance, banks that receive federal funds or are federally insured should have their investment loan portfolios subjected to the same review that other federally funded or licensed projects undergo. This action would help control the use of these funds for projects adversely affecting historic places.

The Advisory Council on Historic Preservation should be given greater authority to initiate action on behalf of historic properties, and its review power should involve more than just recommendations particularly in regard to federally owned property. Punitive action should be available for use against agencies failing to comply with the review regulations. In general, however, the goal of historic preservation can be realized better by incentive programs than by regulations.

HISTORIC PRESERVATION AS A NATIONAL PRIORITY

The low priority given the national goal of historic preservation is evident in the fact that no mention of

the subject, or even of any type of protection for cultural resources, appears in the President's 1976 State of the Union Address and, indeed, such reference is difficult to find in political statements. In the political arena, the constituency for historic preservation is hard to locate. The good deeds and hard work of many nonprofit organizations are practically unknown by the Congress. Preservation as an activity of the marketplace, as a business, is known only to a handful of professionals. Unorganized and politically weak, the preservation administrator, architect, planner, lawyer and historian needs a politically active organization that will provide professional and educational services, represent the preservationist in the political arena, set standards and seek new areas of involvement. Although prevented by law from lobbying, the National Trust for Historic Preservation could become a stronger spokesman for preservationists. The Trust could give additional support to raising the standard of job performance by expanding some of its services, such as job referral, specialized seminars and professional counseling, and by offering new services in public education, professional membership requirements and training opportunities for the specialist. Such development of professional preservationists would provide an able and experienced group that is needed to speak for preservation in public debates and decisions.

Preservationists face many obstacles to guaranteeing a higher and more visible priority for national preservation goals. One obstacle is the lack of standards, definitions and quality control that determines success and failure in historic preservation. Another obstacle is determining

who is a preservationist. The commitment to protecting cultural resources and guiding change in the environment is not always the primary mission of a historian, archaeologist, architectural historian, planner, architect, lawyer or others who depend on cultural resources for their data and studies. When preservation is part of research activities without being equally well attached to an action activity, it may become only an exercise in documentation.

Other factors that may become obstacles are the current national economic condition and the American Bicentennial celebration. Together, these developments have contributed to euphoria and a growing number of converts to historic preservation. A drop in the interest rates and decline in Bicentennial activity, however, will result in a loss of many converts and a rise in problems for the preservationist. To meet the effect of these activities on our cultural resources, energy must be spent now by the federal government to realize its preservation obligations. There must be a higher level of commitment by our government to preservation. There must be recognition that a national goal cannot be realized through current programs, funding and organization.

The year 1976 heralds a new century for America. It should also herald an increased awareness by the federal government of the need for its broader leadership in preserving historic America. Preservationists must unite to overcome the obstacles facing them. They must see to it that the United States of America takes pride in its past, and that the federal government is dedicated to insuring that our cultural resources are guaranteed a life in the future.

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RÉSUMÉ

Depuis ces 70 dernières années, le gouvernement des Etats-Unis développe lentement un programme national de protection des ressources historiques et culturelles de la nation. Un grand nombre de lois publiques et de décrets traduisent de grands projets de conservation, le plus récent étant le Décret pour la Conservation Nationale des Sites Historiques de 1966. C'est au travers d'une révision de plusieurs programmes fédéraux créés pour la mise en oeuvre d'un projet de conservation que l'objectif d'une conservation nationale émerge. La priorité de la conservation en ce qui concerne le gouvernement ne devient évidente, cependant, que lorsque l'on examine les autres programmes fédéraux qui touchent de près aux monuments. Un examen indique que de nombreux programmes appuyant la conservation sont compromis par d'autres programmes fédéraux dont les procédures présentent des obstacles à la conservation historique. De plus, il existe des programmes dont il est fait trop peu de cas.

Les travaux de la conservation historique fédérale

recouvrent tout d'abord les programmes de l'Administration des Parcs Nationaux du Département de l'Intérieur et du Conseil pour la Conservation Historique qui fait appliquer la révision obligatoire des projets fédéraux touchant aux sites historiques. De plus, d'après les exigences du Décret d'Exécution 11593, lancé le 13 Mai 1971, tous les services et bureaux fédéraux sont obligés de reconnaître et de protéger les propriétés historiques en leur possession. Le Service des Transports, le Conseil pour la Qualité de l'Environnement, l'Administration de Services Généraux qui dirigent des bâtiments appartenant au gouvernement fédéral, le Service du Logement et du Développement Urbain et la Fondation Nationale pour les Arts et les Humanités ont tous développé, ces dix dernières années, des programmes supplémentaires qui appuyent la conservation. Les programmes de ces bureaux offrent de nombreuses possibilités d'entreprendre des projets de conservation et de s'assurer de la protection des propriétés historiques. Bien que le gouvernement fédéral dépense des quantités

croissantes de temps et d'argent pour la conservation historique, il existe encore des conflits avec les autres programmes fédéraux. Un de ces conflits réside dans les projets particuliers qui portent atteinte à la conservation historique, lorsqu'il y a désaccord en ce qui concerne les méthodes à employer pour amoindrir les effets pernecieux. Une autre sorte de conflit réside dans les programmes fédéraux là où la législation a provoqué la mise en oeuvre de procédés qui ne font aucun cas des propriétés historiques.

Il existe, en outre, des problèmes de conflits de priorité au sein même du Service des Parcs Nationaux, le bureau officiel pour la conservation. Malgré les nombreux programmes de conservation, y compris tous ceux du Bureau d'Archéologie et de Conservation Historique, les bureaux fédéraux qui déterminent les allocations de budget et de personnel ignorent souvent le fait que les programmes approuvés par le Congrès et par le Président ont augmenté les responsabilités du personnel. De plus, de nombreux bureaux fédéraux font face à la difficulté d'obtenir du Congrès l'autorisation de fonds suffisants qui leur permettraient de faire face à leurs obligations envers les lois publiques et les décrets d'exécution.

Actuellement, les efforts du gouvernement fédéral sont insuffisants à réaliser aucun projet significatif de conservation de nos ressources historiques. Bien que la conservation historique soit la responsabilité de tout bureau fédéral, le gouvernement devrait jouer un rôle plus positif en accroissant la priorité de la conservation.

Le gouvernement pourrait être un agent plus efficace en renouvelant les encouragements et en augmentant les arrêtés: règlements, encouragements tels qu'une mise en fond à long terme pour les projets spéciaux, que la création d'un centre de conservation, que des prêts, des garanties d'hypothèques, des changements des lois sur l'impôt personnel, un accroissement des possibilités d'éducation et un engagement au sein des projets internationaux de conservation. Il faudrait élargir les règlements actuels régis par le Conseil pour la Conservation Historique afin de permettre au Conseil de lancer une action en faveur des propriétés historiques et d'instituer des poursuites contre les bureaux qui ne se conforment pas au règlement de la révision des projets.

Pour que le gouvernement place davantage en évidence le projet de conservation historique, il faut que les conservateurs de profession s'organisent et deviennent politiquement plus actifs. Il faut saisir à bras le corps les obstacles tels que le manque de normes de définition et d'objectifs de la conservation nationale. Il faut se préparer à considérer les nouveaux problèmes qui se développeront avec la chute d'intérêt et le déclin des festivités du bicentenaire. Le gouvernement fédéral doit porter toute son énergie, avec l'esprit de 1976, à concrétiser ses obligations envers la conservation, et s'engager à un degré plus haut dans la conservation. Il faut que l'on reconnaisse qu'un projet national requiert davantage de programmes, de fonds et d'organisations qu'il n'en existe à présent.

FOOTNOTES

1. These laws are described and analyzed in terms of attaining "the goal of an adequate national preservation program" in a report entitled *The National Historic Preservation Program Today*, prepared by the Advisory Council on Historic Preservation at the request of Henry M. Jackson, Chairman, Committee on Interior and Insular Affairs, United States Senate, January 1976, U.S. Government Printing Office, Washington, D.C., 1976.
2. National Trust for Historic Preservation, *A Guide to Federal*

Programs, Washington, D.C., 1974.

3. National Trust for Historic Preservation, *Goals and Programs*, Washington, D.C., 1973.

4. Pennsylvania Avenue Development Corporation, *Pennsylvania Avenue Plan-1974*, Washington, D.C., 1974.

5. These are described in *Report, Compliance Issue*, Advisory Council on Historic Preservation, Washington, D.C., April 1976, Vol. IV, No. 3.