



A Report of the National
Historic Designation Advisory Committee:

Recommendations for Improving the Recognition of Historic Properties of Importance to All Americans

NCSHPO

National Conference of State Historic Preservation Officers

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I. Introduction

According to the National Park Service (NPS), “[t]he National Register of Historic Places is the official list of the Nation’s historic places worthy of preservation. Authorized by the National Historic Preservation Act of 1966, the National Register of Historic Places (NRHP or National Register) is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America’s historic and archeological resources.”¹

Despite the nearly 100,000 listings, which include districts, sites, buildings, structures and objects that are significant in American history, architecture, archaeology, engineering and culture, the NRHP is perhaps one of the mostly widely known yet misunderstood programs in the United States. To the public, the National Register, often referred to as the “Historical Registry” or any number of variants, the concept is generally simple – a national list that commemorates historic places widely assumed to be protected from further destruction. However, the fundamentally place-based NRHP is a great deal more complex – serving not only as a means to recognize historic places but also as a planning tool that triggers a variety of different federal regulatory processes, for which “protection” may be encouraged, but not guaranteed. While listing alone affords very little if any protection, consultative review and sometimes mitigation are required for federally funded or permitted projects under a regulatory review process known as “Section 106,” and National Register status does unlock access to incentives like the Federal Historic Tax Credit Program or, at times, grant funding. Beyond that, listing is predominantly honorific – used to recognize our most cherished historic and cultural places.

¹ National Park Service, *National Register of Historic Places* [website], <https://www.nps.gov/subjects/nationalregister/index.htm>, (accessed 31 January 2022).

II. NHDAC Goals

State and Tribal Historic Preservation Officers (SHPOs and THPOs), statutorily charged with facilitating constituent access to the National Register program in their respective jurisdictions, act as the individual service units of government with the best opportunity to enhance the nation’s ability to employ the National Register for a wide variety of individual purposes. The working group supports the broader national dialogue through the following goals:

- **Identify both challenges** to public access to and successful listing in national historic designation programs *and* **best practices** that optimize access and enhance the prospect of successful listings;
- **Seek dialogue and input** from a wide variety of

In recent years, there has been an increasing concern related to equity and inclusion within the preservation field, with particular criticism directed at the NRHP and the designation process. As a result, many have started to examine how and whether the listings in the NRHP tell our nation’s full story and, if not, what impediments exist that prevent it from doing so.

To this end, the National Conference of State Historic Preservation Officers (NCSHPO) convened the National Historic Designation Advisory Committee (NHDAC) in 2021 to examine the intent, history and implementation of the NRHP with an eye towards fostering greater access and inclusion. The NHDAC, through the work of its steering committee, three sub-committees and one NCSHPO standing committee, has endeavored to comprehensively analyze whether the NRHP is meeting its original established goals; what, if any changes might be necessary to improve access and inclusion; and whether additional or new programs are necessary. Specifically, the NHDAC focused on and explored ways to:

- Promote maximum public accessibility to national historic designation programs, such as the National Register of Historic Places;
- Identify paths to national recognition for historic places that are not eligible for the National Register;
- Support preservation of not only extant historic resources but also the multiple layers of history tied to a particular place; and
- Achieve the shared goal of telling the full, complex American story throughout the nation through historic preservation.

stakeholders on these issues;

- **Organize and implement** professional practitioner **training and exchange** regarding best practices;
- **Identify needs** in terms of regulatory or policy changes, staffing, administrative and operational matters, and funding necessary to achieve these goals.

Standing and Sub-Committee Charges

NHDAC Scholarship/Data Subcommittee

There has been a great deal of material written about the National Register process in recent years focusing on chal-

lenges of recognizing places of importance to constituents, including members of underrepresented communities. The charge of this subcommittee is to examine objectively this material, existing data, and current processes, with a goal of developing a sound description of both real and perceived gaps and challenges.

NCSHPO External Affairs Committee (Standing Committee)

The External Affairs Committee of NCSHPO has the responsibility for making recommendations to the NCSHPO board of directors for matters relating to:

- Government relations and advocacy
- Inter-organizational relations
- Public relations and communications

The External Affairs Committee was activated to perform the stakeholder outreach required for the NHDAC.

NHDAC Best Practices Subcommittee

With a focus and interest in recognizing places of importance to underrepresented communities, many approaches have been employed by both domestic and international governments and organizations. The charge of this sub-

committee is to examine these various approaches, both within *and outside of* the National Register framework, to develop a set of “best practices” for designation purposes.

NHDAC Policy Subcommittee

A combination of federal laws and regulations inform the tools that have been developed to recognize and protect places of importance. The charge of this subcommittee is to examine the why and how of these tools and to identify what changes, if any, may be necessary to improve the recognition of places of importance to all Americans.

Next Steps

A draft of this document was shared with stakeholders who participated in a series of Listening Sessions, described in Section V. Feedback and comments led to some further revisions and have resulted in this set report made on behalf of NCSHPO. The next step will be the development of an Action Plan to further recommendations where consensus is apparent and for further study where consensus is not. This effort is not meant to be prescriptive – rather it is an attempt to convene stakeholders towards productive and practical solutions to improve the recognition of historic properties of importance to all Americans.

III. Executive Summary

The National Register of Historic Places (NRHP) is the nation’s primary mechanism for identifying and designating historic places that are significant and worthy of preservation. Authorized by the National Historic Preservation Act of 1966, the program is managed by the National Park Service and administered by each state and territory through its State Historic Preservation Office (SHPO). Despite its nearly 100,000 listings, however, the NRHP is consistently misunderstood by its biggest constituency: the American public. Most of the misunderstandings are centered around the expectation that listing in the NRHP offers protection and regulation, when in reality, it was designed to encourage preservation by recognition and commemoration.

Not only is the NRHP misunderstood, but it has also not been widely used to recognize places of importance to many Americans whose history, sites, buildings, neighborhoods and cultural touchpoints may have been for generations intentionally or unintentionally overlooked or not considered. Likewise, as a tool for preserving the sacred places of sovereign indigenous tribes and organizations, the NRHP has not always been wholly successful at fostering preservation because recognition may bring attention to sensitive sites with few actual protections. In recent years, there has been increasing attention related to equi-

ty, inclusion, and access concerns within the preservation field, with particular criticism directed at the NRHP and the designation process. As a result, many have started to examine how and whether the listings in the NRHP tell and represent our nation’s full story, and if not, what obstacles prevent it from doing so.

This report is the product of an effort by the National Conference of State Historic Preservation Officers (NCSHPO) to examine how we recognize our historic places, with particular attention to the NRHP. The NCSHPO established a National Historic Designation Advisory Committee (NHDAC) in 2021 to conduct a comprehensive analysis of the NRHP’s original established goals, how well those goals are being met, what opportunities to improve overall access and inclusion might exist, and whether new programs may be part of the solution.

Project Vision

The NHDAC conceived this study as a starting place for discussion and action; a foundational document to articulate in one place history and intent, policy and regulatory inadequacies, and recommendations and opportunities for improvements. Our vision is to:

- Promote maximum public accessibility to national

historic designation programs, including but not limited to, the NRHP;

- Identify paths to national recognition for historic places that are not eligible for the NRHP;
- Support preservation of not only extant historic resources but also the multiple layers of history tied to a particular place; and
- Achieve the shared goal of telling the full, complex American story across the nation through historic preservation.

Study Goals and Methodology

Comprised of three sub-committees and one NCHSPO standing committee, the NHDAC began its work by establishing the following goals for this study:

- Identify challenges to public access to and successful listing in national historic designation programs *and* best practices that optimize access and enhance the prospect of successful listings;
- Seek dialogue and input from a wide variety of stakeholders on these issues;
- Organize and implement professional practitioner training and exchange regarding best practices;
- Identify needs in terms of regulatory or policy changes, staffing, administrative and operational matters, and funding necessary to achieve these goals.

The subcommittees divided the work into four main task areas to achieve the goals:

- Review existing literature and track the evolution of scholarship to establish context and understanding of critical issues;
- Identify and engage broad swath of stakeholders to understand real world concerns and inform findings and solutions;
- Develop best practices through surveys and discussions with domestic and international cultural resources staff;
- Identify legislative and policy existing conditions and tools for change.

Key Findings

Each subcommittee developed a set of findings, which are summarized by topic here:

Relevance and Utility

The NRHP remains relevant and useful as a sorting and planning tool for federal and state agencies, encouraging rehabilitation projects, improving preservation outcomes, and

building community. However, the public does not fully understand the program, its rules or its limitations, the expectations regarding documentation can be onerous and expensive, and listing does not in and of itself offer protection.

The NRHP does not optimally address places of cultural memory, non-traditional physical integrity, or places where there is little physical footprint. To address this shortcoming, many states have developed alternative and additional designation programs that address among others, cemeteries, heritage traditions, and other aspects of culture that don't fit neatly in the rubric of the NRHP. SHPO partnerships with statewide non-profits are used to broaden the reach.

Integrity

The notion of historic integrity, or physicality, can be subjective and hard for the public to understand. It also can be seen as a barrier to communities and individuals where marginalization, lack of investment or erasure have made integrity, in a physical sense, a serious challenge. The analysis required for this element ends up being a big driver of cost – complex integrity issues frequently require a professional to address. Integrity is also not part of the tribal worldview, so focusing on the physical aspects of integrity over feeling and association frankly can favor the built environment over cultural landscapes. Tools provided by the NPS are very helpful in addressing some of these issues (i.e. Multiple Property Documentation Forms), but are poorly understood and underused.

Indigenous Populations

Understandably, tribes do not want to share information or attract attention to a site, which is just the opposite of what the NRHP requires. Because they are considered public programs, not all states have adequate confidentiality laws to protect the information shared in a nomination. Documentation requirements can often discount oral histories and traditional knowledge, which are common sources of information for tribes and other ethnic minority groups. Boundaries and ownership are largely imported concepts for tribes and the requirements to address these issues when listing a Traditional Cultural Place (TCP) can potentially perpetuate epistemological injustice. Importantly, tribal sovereignty is more than slighted in the process – they should not have to depend on the state and local decision-making gauntlet to reach the federal government to conduct Government to Government consultation. At the same time, state, local and private property rights and interests require due process considerations – setting up an awkward regulatory conundrum.

Program Administration

Tension exists between the grassroots “DNA” of the histor-

ic preservation movement and the formalized academic “professionalized” approach into which it has evolved. There is also an inherent tension in a program where the federal government has the last word about what local communities think is important about their own cultural identity. Combined with inconsistent review policies at the local, state and federal levels, the resulting process can be intimidating, difficult, and expensive for the public to access.

Public demand and SHPO emphasis are leading to an increase in the numbers of nominations from diverse communities but money and staffing are barriers to encouraging this activity. Current NPS guidance further hampers the effort, as relevant bulletins are outdated and insufficient to address a broader perspective in the designation process.

SHPOs note several problems specifically related to the administration of their primary funding source, the Historic Preservation Fund (HPF). Surveys that do not result in a NRHP nomination as the end product are not eligible for reimbursement by HPF. This reality handicaps local governments from taking the first step in identifying their historic resources. In addition, the Certified Local Government grant, and other federal grants, are difficult and time-consuming to administer, siphoning resources away from staff-led initiatives and outreach programs at the SHPO to address these needs.

International Programs

While mechanics vary as expected, the designation programs in Canada, the UK, and Australia shared a few commonalities: no age minimum for listing; owner consent considered but not required; an increased effort to address indigenous and aboriginal culture and heritage with separate programs or legislation; including values other than historic in their programs, including social, scientific, natural, spiritual, and cultural; addressing event-based practices as well as place-based practices; and protection at the local level with the exception of Australia’s “National Heritage List.”

Recommendations

The NHDAC developed the following set of recommendations to address the key findings.

National Register Criteria

- Consider adding new criterion for recognition of places of cultural significance that may not retain integrity as traditionally understood, but that may hold deep importance and meaning to groups and communities.
- Consider new criterion and documentation standards for TCPs.

- Consider new criterion or other tools for indigenous cultural sites.

National Register Guidance

- Expand and update existing guidance for preparation of National Register nominations.
- Create new guidance for cultural landscapes.
- Expand and update guidance for evaluation of the aspects of integrity.
- Promote and provide guidance for existing tools to address places where little or no integrity exists but the significance is unquestionable.

National Register Documentation, Survey, and Training

- Urge NPS to develop videos and/or webinars that provide more detailed information about documentation expectations and requirements.
- Increase peer interaction among NPS, Tribal Historic Preservation Officers (THPO), and SHPO National Register Reviewer staff.
- Reconsider existing documentation requirements.
- End or clarify NPS requirement that HPF-funded surveys must lead to National Register nominations.
- Consider developing unified, simplified, and streamlined eligibility determination processes for public use that help set expectations up front and allow both applicants and SHPOs to identify and prioritize historic resources.

Increased Funding

- Seek and secure new dedicated funding for SHPO staff and NPS field assistance for National Register preparation.
- Establish a pilot program with steady funding to produce 1-3 new historic contexts per year by NPS and states alike.
- Seek and secure funding to revise and update older, “leaner” National Register nominations.

Indigenous Population Autonomy

- Explore ways to provide tribes and Native Hawaiian Organizations more autonomy in the National Register eligibility and listing process.

Increase Diversity in Staff and Volunteers

- Strive for cultural and professional diversity on state and local review boards.
- Strive for cultural diversity in staff.

Public Education, Outreach, and Involvement

- Collaborate, assist, and encourage partnership directly with diverse and grassroots communities in the preparation of National Register nominations.
- Highlight funding opportunities for diverse communities.
- Develop educational and training materials in non-jargon, easier-to-understand terms for public constituents.

Increase Focus on and Support for Local Designation Programs

- Encourage the establishment of local registers where protections are needed and extend to sites that may not meet National Register criteria.
- Increase investment in and visibility of Certified Local Government (CLG) program.

- Improve access to CLG program.

Next Steps

This study represents a first step in developing long-term solutions to the problems inherent in a programmatic approach to identifying, documenting, and protecting those historic and cultural resources our country holds most dear, and in doing so, holistically representing American history through the multitude of places Americans should know and value. Every level of government and every member of the public has a role and responsibility to be part of the solution. For every recommendation made in this report, there exists a dozen more questions to be sorted. We believe these important questions merit additional research and debate at the national level, with the goal of developing an informed, consensus-based framework for action.

IV. Scholarship / Data Subcommittee Report: Historiography and Analysis of Writings Related to the National Register of Historic Places

Between June and October 2021, the Survey and Data Subcommittee produced a 50+page Historiography (attached as Appendix C), consisting of over 140 academic, professional, and popular articles focusing on historic preservation and the National Register. The publication dates range from 1965 to the present, with over half of the reviewed articles written after the turn of the 21st century. The Historiography is only a sampling of historic preservation scholarship spanning five decades and should not be considered a comprehensive study of Historic Preservation. It does not include oral presentations from local, state and national conferences, nor articles from local community or state newsletters that were undoubtedly important in this rapidly developing field. It also may not include articles addressing the many fields encompassed by historic preservation such as articles focused on archeology or architecture that addressed the National Register or Historic Preservation Issues. Despite its limitations, this Historiography suggested the following three major takeaways to the NHDAC Scholarship/Data Committee:

1. The National Register is a significant and influential component of the modern preservation movement. Its application and the types of resources it recognizes has continually evolved since it was created, and its evolution has been consistently reflective of social and economic issues in any given period. Further, the desire to increase equity, inclusion, and representation in the National Register is not a new call to action. It began almost as soon as the Register was established, and the Register has indeed gradually broadened. However, it has not yet fully evolved

with the current sophisticated understanding of the core competencies underlying equity and inclusion.

2. Many early Historic Preservation movements were local and grassroots in nature. However, as a more formal national discipline, Historic Preservation and the National Register came to age amid a shift in academic schools of thought, from the traditional and more narrow “top-down” approach of the 1940s and 1950s, to a broader and more expansive or “bottom-up” approach reflective of the 1960s and 1970s. Reverberation radiating from this shift is still evident through issues contemplated today. Localized preservation advocacy efforts are a critical component for National Register nominations, and the majority of nominations made for local level of significance reflects this grassroots nature of historic preservation.
3. As historic preservationists endeavor to tell the full, complex American story, academic history, public history, archeology and architectural history have all grown increasingly more multifaceted and complex. This scenario poses the question: If American History is complicated, how do we make national historic designation programs like the National Register of Historic Places able to accommodate this complexity, resulting in more equitable and inclusive outcomes for marginalized communities, where the local story is highly significant and matters?

Looking Forward: The Short and Long View

The Historiography, although clearly not exhaustive and

focused on academic publications, demonstrates that both applied and academic history as evidenced in Historic Preservation is complicated and has become increasingly intricate over the decades. In considering some of the current criticisms of the National Register, many suggest that the ability to add more places with varying interpretations of integrity would allow for more properties associated with underrepresented or under-resourced communities to the National Register. A variety of historical, environmental, economic or social changes have been caused by a number of forces including development, natural disasters, migration and settlement, abandonment, assimilation, slavery, racial segregation, discrimination, economic disruptions, urban renewal, transportation corridor expansions, disinvestment, environmental degradation or a combination thereof. These forces have often impacted, damaged, destroyed, hid, or erased historical places. As one might expect, little may be left completely unscathed, or in some cases, nothing at all. If we are to ensure that the National Register produces more equitable outcomes by being more inclusive—and more representative of actual history, we must figure out how to represent places that

we know are historically significant—not in spite of their lack of integrity, but perhaps because of it. Yet in addition to developing a way to appropriately document the less tangible or intangible, there would also need to be a way to address what treatment or level of preservation, if any, would guide its future. In other words, is what is being preserved a physical place or just the story?

In taking the longer view, the Historiography shows that the practice of historic preservation has taken a cyclical rather linear path through time. Today's historic preservationists represent the most diverse generation in American history. As they were 50 years ago, preservationists are challenging earlier ways of thinking about the past. They want to see the full range and intersectionality of Americans, difficult history, and even new technologies represented in historic preservation. And today's preservationists face extraordinary federal infrastructure spending that will support unprecedented construction not seen since the postwar years and the passage of the NHPA. The Historiography shows that, in many ways, the current path of historic preservation is parallel to where we started.

V. NCSHPO External Affairs Committee Report: Stakeholder Outreach Results

The NCSHPO External Affairs Committee (EAC) developed a list of national organizations to solicit feedback about the existing National Register program, opinions about the goals of historic designation, and ideas on how to eliminate barriers that prevent culturally diverse communities from using the National Register process to reach their historic preservation goals.

The Committee identified stakeholder groups at the national level, including both traditionally collaborative organizations and ones the preservation community does not typically engage with on a regular basis, but aspires to connect with going forward. Sovereign tribal governments, SHPO staff, and our administrative partner, NPS, were engaged a bit differently, as described below. The EAC invited organizational representatives to six virtual listening sessions that took place via "Zoom" digital platform on September 9, 10, 15 and 17; and October 6 and 8, 2021. In addition, the committee received detailed written comments from one organization which could not attend any of the listening sessions.

A total of 39 invitees attended the listening sessions; most organizations sent one individual to represent the organization. A few participants represented more than one organization. Several individuals participated on behalf of an organization but did not feel comfortable representing their organization's views as a group.

Since the National Register of Historic Places is a NPS program and a unique administrative partner to the SHPOs, NPS National Register management and staff were invited to attend both as participants and listeners, and they were able to make four of the listening sessions.

Additionally, due to the sovereign nature of tribal governments, and to their similar role to SHPOs, we offered the broader board of the National Association of Tribal Preservation Officers (NATHPO) their own listening session.

Each listening session began with a brief slide deck introducing the broader NHDAC effort, introducing committees and their members, the goals and timeline of the project, and the intended deliverable. To foster candor, the Zoom sessions were not recorded; the EAC delegated transcribing duties to two committee members, who took detailed notes at every session.

All participants were asked the same five questions:

1. Does your organization find the National Register a useful preservation tool? Why or why not?
2. Are the criteria and aspects of integrity used to identify whether a property is eligible for listing in the National Register still relevant, adequate, or useful?
3. Would the National Register process benefit from revisions or reworking?
4. Is the amount of documentation required for Na-

Invited Stakeholder Groups

American Association for State and Local History	GLBT Historical Society	National Park Service
Advisory Council on Historic Preservation	Hispanic Access Foundation	National Preservation Partners Network
American Cultural Resources Association	Historic Tax Credit Coalition	National Trust for Historic Preservation
American Institute of Architects	Latinos in Heritage Conservation	Partners for Sacred Places
Asian Pacific American Heritage Association	National Alliance of Preservation Commissions	Preservation Action
Coalition to Protect America's National Parks	National Association for State Archaeologists	Society for American Archaeology
Cultural Landscape Foundation	National Association of Tribal Preservation Officers	Society of Black Archeologists
DOCOMOMO	National Council of Public History	Society for Historical Archaeology
Federal Preservation Officer Forum	National Parks Conservation Association	Society for Industrial Archaeology
		Vernacular Architectural Forum
		US/ICOMOS

tional Register nominations appropriate? Is it cost-prohibitive? Is it accessible to a diverse range of public participants?

- Does the current process easily allow for the listing of culturally significant properties, tribal properties of sacred significance, and cultural landscapes?

Once the listening sessions were completed, EAC members analyzed the notes for recurring and important themes, consistent observations, and significant issues. This section is a synthesis of those themes and issues, organized by identified themes, and concluded by observations from EAC members.

Common Themes

Relevance and Utility

During the listening sessions, the EAC asked the question, “*Is the National Register a useful tool for preservation?*” Predictably, responses were mixed. Generally, people who represented federal agencies or those employed in cultural resource management felt that the National Register proves very useful in that it provides the framework for future conversations about preservation, including which properties are eligible for taking advantage of tax incentives, or which should be more keenly considered under Section 106 when an adverse effect is a possibility. Some federal agencies successfully leverage National Register designation as an internal process to protect or recognize the properties under their ownership or management. Others stated that at best, the National Register is useful in that it raises the profile of significant historic resources and is a tool that grounds the benefits of preservation in local stories that make it “real” for policymakers.

But even the aspects of the Register that are seen as benefits are fraught with difficulty for the following reasons

noted by various stakeholders:

- Lack of understanding and misconceptions about what listing really means and doesn't mean can make many people leery of perceived public control over private property, and the amount of time that it takes to list a property in the National Register may complicate a proposed tax credit project.
- Tribes responded, almost unanimously, that not only does the lack of protection to listed properties provide a disincentive to nominate an important site, but also at times the listing itself and the publicity that it generates brings unwanted attention, visitation, and often vandalism to sacred places. One of our stakeholders indicated that in her experience, a tribe will avoid listing if possible. The unwanted attention brought by listing leads to pothunting, looting, and inappropriate ceremonialism at the site.
- The amount of documentation necessary for listing and differences in states' abilities to maintain confidentiality creates vulnerability for tribal sacred sites.
- The National Register is not a good tool for preserving sites associated with the everyday life of people; too much emphasis is placed on aesthetics and historic integrity. One person specifically stated that we need to do a better job of designating properties associated with people of color that are not 'built environment' resources, and to assist people with listing places of cultural memory that have a minimal physical signature.
- Listing cemeteries is problematic, even if possible. The requirement to justify listing through a criterion consideration is cumbersome, especially since a graveyard may be all that remains of a place associated with people of color. A lack of protection for listed properties means that if protection is what

is sought, a local landmarking process, which takes less time and usually less effort, will serve the purpose better.

Integrity

During the listening sessions, a theme that resonated time and again was that questions of integrity, or perceived lack thereof, were critical in making historic preservation in general, and the National Register in particular, inaccessible to most, citing the following rationales:

- Integrity can be seen as a murky concept that the general public finds difficult to comprehend and apply. If only trained professionals and architectural historians can apply the aspects of integrity, then the public has little chance of writing a successful nomination for a property that may be considered to lack in certain aspects of historic integrity. Where professionals are required, costs of a project increase greatly, which may price them out of the entire endeavor. One participant, who works with an LGBTQ organization in the San Francisco Bay Area suggested that setting, design, workmanship, and materials should not even factor into a property's consideration of integrity, which leaves notions of feeling, association, and location as the meaningful aspects to her organization.
- Under-resourced communities have traditionally lacked the funds to maintain buildings to a preservation standard that would include the retention of character-defining features. One of our participants who represented Latinos in Heritage Conservation noted that "...Integrity is not sensitive to the vernacular nature of some buildings. The economic reality for Latino communities is that additions are typically 'ad hoc' and thus, not professionally designed. In residential situations, people would add on to a current house rather than buy a new house." A critical eye toward the historic integrity of a simple building with "ad hoc" additions or alterations puts an emphasis on aesthetics over significance and may pose an issue of equity. Similarly, for districts reflecting historically marginalized communities, integrity can be evaluated in the context of demolition and widespread erasure. Multiple vacant lots should not impact integrity assessment, instead boundaries should be drawn based on the historic boundaries of the neighborhood.
- The notion of integrity is not part of the tribal worldview, which views all the land as tribal country and therefore significant. Additionally, the concept of integrity favors the built environment, and is difficult to apply to cultural landscapes or natural vistas that may make up Traditional Cultural Properties (TCP),

which do not fit into the National Register in any elegant way. How do we decide how much change in a cultural landscape is permissible, when integrity is, by its nature, a very subjective concept?

- Federal agencies that work with concepts of integrity on a regular basis noted that integrity as a concept is inherently flexible, and that the interpretation of integrity is dependent upon the specific resource and the challenges it represents. Even if true, this returns us to the notion that flexibility in applying the aspects of integrity in challenging circumstances falls to professionals who have been trained to do so. It was noted many times that the use of the Multiple Property Document Form format, (MPD or MPS) was a brilliant tool to overcoming integrity issues and increasing access to listing but was underused and frequently misunderstood.

Accessibility

Panelists' responses to the questions also addressed the theme of increasingly limited accessibility of the National Register for members of the public. While the EAC pointedly addressed the issue of accessibility, loosely defined as the ability for the public to readily understand and participate, in the question pertaining to the appropriateness of the documentation necessary to list a property, the issue of accessibility also arose in responses to other questions regarding the National Register's engagement with TCPs and cultural landscapes, application of significance criteria and integrity standards, and the overall process of listing. The general perception among panelists is that while the National Register was created as the list of important places for all Americans, over time the process for listing has become so byzantine and cumbersome that it has inadvertently created significant barriers for listing properties. These barriers can be overcome through the hiring of trained professionals; however, many individuals and organizations, particularly from underrepresented communities and tribal governments, often lack the financial resources to hire consultants who specialize in writing National Register nominations. The result is a de facto "pay to play" model that promotes an inequitable pipeline of nominations that may not be reflective of all communities' preservation priorities - particularly the priorities of underrepresented or under-resourced communities. Panelists noted the following factors as creating problems for equal and equitable access to National Register listing:

- Inconsistent review policies on the part of state review boards and NPS National Register review staff. This inconsistency creates nomination returns and the need for multiple drafts prior to successful listing. The perception that the nomination process is a "gauntlet" deters many proponents who are seeking

listing primarily for the honorific status, rather than for development incentives linked to listing.

- Excessive documentation standards for nominations, particularly those proposing Criteria A and B (non-architectural) significance. Panelists observed an increasing trend on the part of both state review boards and the National Register office for requiring scholarly research and abundant citations in support of the Section 8 Statement of Significance. These requirements establish a bar for documentation that non-professional preparers can rarely meet.
- Disproportionately onerous requirements demanded of tribes who seek to list properties of traditional and cultural significance to the National Register. Panelists representing tribes, in particular, noted that traditional knowledge and oral history were often viewed by state review boards and National Register reviewers as less credible sources of information than archaeological data and written records.
- Several representatives from tribes voiced deep offense that elements of cultural and spiritual practice must be “proven” to non-native reviewers. Notions such as boundaries and ownership, both key requirements of the National Register, are examples of what tribes see as the profound epistemological injustice inherent in the program. Some expressed that an “Indian First” perspective should be employed for evaluation of sites and landscapes.
- The problem of increasingly limited accessibility was discussed by several panelists representing underrepresented affinity groups as ultimately detrimental to the preservation movement. It was noted that when efforts to list properties are grassroots (as opposed to contracted to a professional preparer), the historic preservation community at large is more fully engaged in the built environment. Grassroots community members are thus well-poised to advocate for preservation. Another panelist observed that “the professionalization of the National Register is an existential threat to the program.”

Structure and Process

It was clear during the listening sessions that participants had concerns with the process and structure of the National Register program. General concerns focused on inconsistencies in the review process, with major concerns noted as follows:

- There is a lack of consistency among state review boards. Some states treat National Register nominations as the official archive of historic information about the property, therefore requiring documen-

tation in excess of the national standard. Added requirements by the states present unnecessary costs to the nomination process and extend nominations’ timelines.

- There is inconsistency among National Register reviewers within the NPS. Some reviewers do not require the same level of documentation as others (including amount of documentation, quality of source material, etc.), and there are differing opinions among NPS staff about what is necessary to include in a statement of significance. Comments returned by reviewers regarding the application of criteria and elements of integrity can be unpredictable. The on-going discrepancy among federal staff reviewers is another reason that developing a National Register nomination is expensive and a sometimes a needlessly lengthy process.
- On a related note, several respondents reported frustration with the lack of consistency between guidance and decision-making at the state level versus the federal level. Nominations prepared under the guidance of SHPOs and approved by state boards are routinely found to be deficient by reviewers at the federal level.
- Tribal respondents did not feel that state review boards should have any authority over the National Register nomination process for tribal TCPs located off tribal lands. They expressed their belief that state review boards do not have the expertise or background to assess whether tribal properties meet the criteria for listing, and therefore should not have the authority to decide the disposition of a nomination. Furthermore, tribal representatives expressed a general concern that the nomination process for tribal TCPs is a sovereign matter that should be conducted directly between tribes and the federal government, with notice given to the states.
- The listing of tribal TCPs was described as difficult for tribal cultural resource staff. The criteria do not seem to match the type of property, although many of these had been listed as a site or district. The issue of integrity was perceived as another hurdle. The elements of integrity were mostly designed for buildings and were therefore not conducive to the analysis of tribal TCPs. One tribal representative discussed the possibility of adding a criterion (Criterion E) especially for TCPs.

VI. Best Practices Subcommittee Report: SHPO, SHPO Staff and International Viewpoints

With a focus and interest in recognizing places of importance to underrepresented communities, many approaches have been employed by both domestic and international governments and organizations. The subcommittee sought to examine these various approaches, both within and outside of the National Register framework, to develop a set of “best practices” for designation purposes.

After conducting general background research into the experience of SHPOs with state registers, evaluating/designating historic properties tied to a diverse community, and what tools and approaches other than designation they use to recognize them, the subcommittee developed a robust list of survey questions (a copy of the questions is included in *Appendix E*). The survey was comprised of 34 questions and deployed electronically to all states and territories through the NCSHPO Forum on August 27, 2021. The survey closed on September 30, 2021.

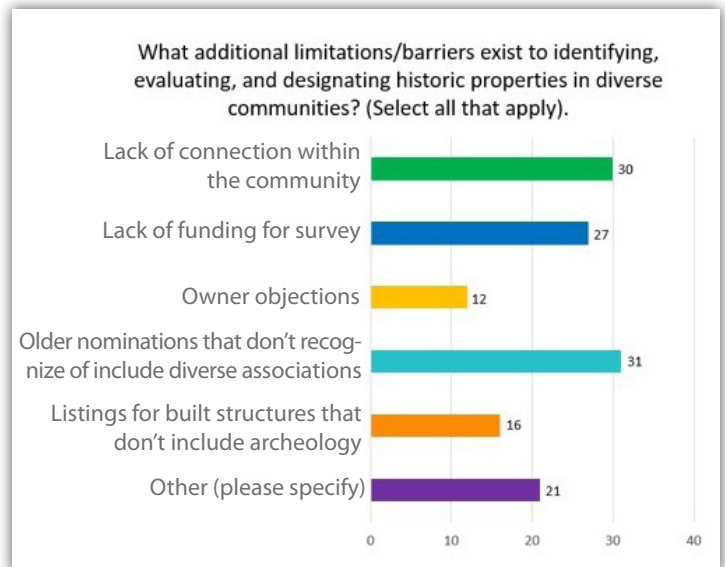
In addition to the survey, the Best Practices subcommittee wanted to understand and learn from international heritage preservation partners. To accomplish this, individuals associated with heritage management in Canada, the United Kingdom, and Australia were consulted to provide us with a better understanding of the designation programs in those countries. The subcommittee set up virtual meetings with these individuals to learn about the general heritage management practices and historic designation processes in each of their respective countries.

Survey Results

Overall, representatives from 44 State Historic Preservation Offices responded to the survey, which represents a 77% response rate. The conclusions, if any, drawn from the survey questions, as well as a summary of the responses to selected questions, follows. When possible, a screenshot of the survey results in graph form is provided.

There are some limitations/barriers in using the National Register and National Register Criteria to evaluate and designate historic properties, particularly in diverse communities

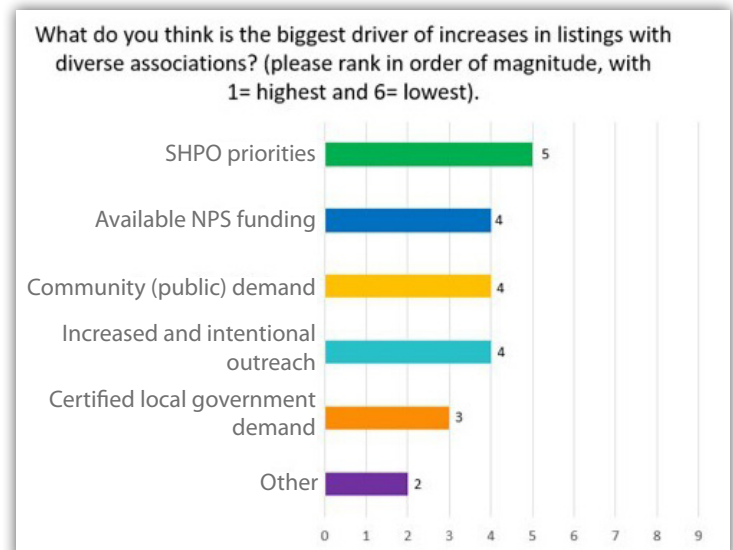
Of the survey respondents, 55% stated that there were limitations or barriers in using the National Register and National Register Criteria to evaluate and designate historic properties, particularly in or for diverse communities. Specific barriers or limitations relating to the National Register that were most identified were integrity issues followed by the “50-year rule,” the lack of documentation or ability to acquire needed information to demonstrate significance, and the lack of context about underrepresented groups.



Other factors identified included the amount of labor required to prepare the documentation/level of scholarship required beyond the original intent of the National Register, the cost to complete a nomination, and resources that are important to a community, but do not easily fit into the National Register program criteria. Also, a documentation and language/jargon barrier seems to pit academics against those seeking nominations when oral or other types of documentation are used.

Nominations of properties related to diverse communities are increasing

Seventy-seven percent of respondents have observed an increase in National Register listings related to diverse communities. When asked to rank various reasons driving this increase, the results seem to indicate SHPO prioritization and available funding play a significant role, followed by public demand.

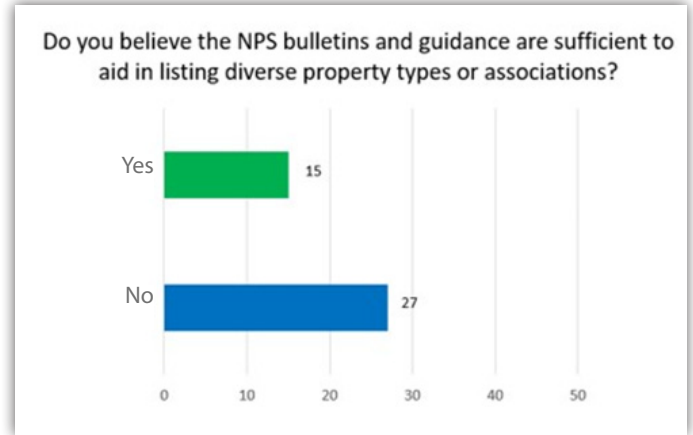


Not all National Register tools and strategies are used as frequently as others, available guidance needs improvement, and new additional guidance is needed.

While between approximately two-thirds of respondents reported using Multiple Property Designation Forms (MPDFs) or have developed Contexts to inform nominations in diverse communities, almost the same number of respondents stated they had not listed a Traditional Cultural Property (TCP) or a Cultural Landscape. Respondents were asked to identify the challenges and opportunities within these tools and frameworks and most selected the ability to list resources more quickly. It is unclear whether this response is viewed as a challenge or an opportunity, however, in the “other” category, several respondents noted that MPDFs provided little to no efficiency – so it is possible that the overall conclusion is that there is a desire for a faster process, but it is unclear whether the available tools assist in that regard. A similar number of respondents noted that NPS bulletins and guidance are insufficient.

When asked in an open-ended question which NPS bulletins and guidance are useful, what bulletins could be developed or adapted that would be helpful, or if new bulletins should be developed, of the survey respondents, 68% responded that the NPS bulletins and guidance either need to be updated or new guidance or bulletins should be developed. Many of the respondents would like the bulletins to be updated with more recent examples or using examples of more diverse property types. Many also indicated that they would like enhanced guidance about acceptable levels of integrity or how to list resources that are important to a community but lack what is considered to be traditional architectural integrity. Some respondents indicated that guidance or suggested strategies for different approaches to researching the history of a property, such as oral history or what to do when there is a gap in the historical record, would be helpful. Some respondents

thought new bulletins or guidance should be developed for topics such as intangible resources, nomination amendments, and bulletins or guidance for non-professionals.

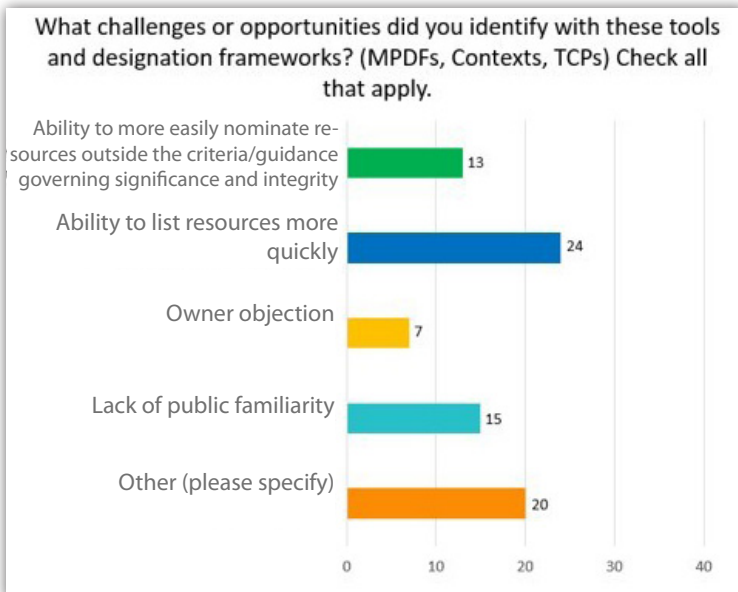


Most states and territories have a designation or recognition program separate from the NRHP that they report have been successful in identifying resources from diverse communities, and that outreach and partnership is key.

Of the survey respondents, 62% stated that they do have a designation or recognition program that is separate from the NRHP. The remaining 38% stated that they do not have a designation or recognition program separate from the NRHP. The most common programs were a state register and a marker program. Of the survey respondents, 61% reported that they have a state register and 17% have a marker program. Other programs that were indicated included a barn registry, archaeological landmarks program, cemetery registry, homestead program, conservation easements, and a freedom trail.

In terms of success, 87% stated that the programs identified in question #13 have been successful in identifying resources from diverse communities. The remaining 13% indicated that their state programs are not successful in identifying resources from diverse communities. Each of the states from the latter group stated in question #17 that their programs did not specifically focus on identifying resources from diverse communities. In fact, 58% stated that these programs were not specifically focused on identifying resources from diverse communities.

When asked what has worked well to help identify and recognize properties of importance to diverse communities, the most prevalent responses are outreach and partnerships. Many respondents reported that initiating direct contact with local groups representing diverse populations is important in building trust and identifying a property’s historic significance within the local context. Some states report creating partnerships with students and local community groups to perform the outreach. Other responses include an emphasis on revisiting older nomi-



nations to include information related to diverse communities, directed survey to identify resources related to specific communities, prioritization of recognizing underrepresented communities, and funding (such as Underrepresented Communities Grants) to create new projects.

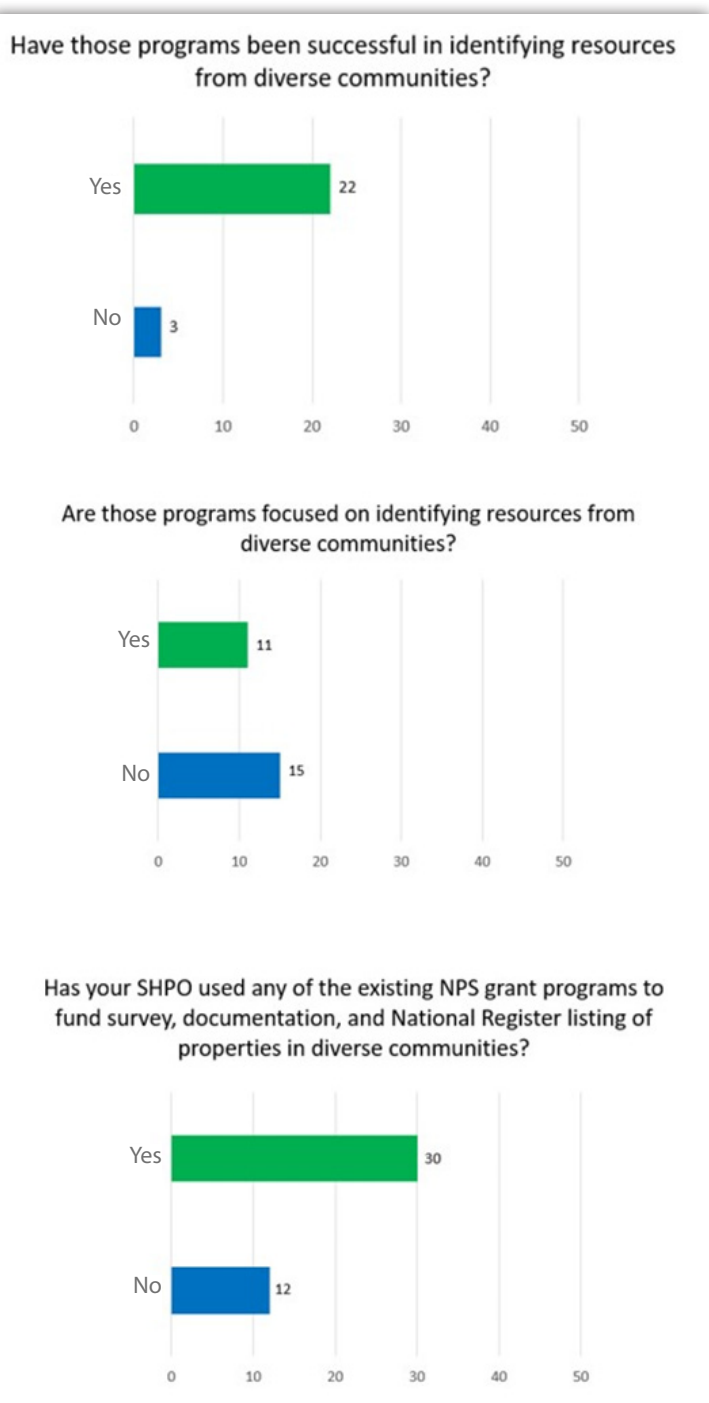
The main challenges reported include a reactionary, as opposed to proactive approach to identifying resources. A lack of staff time to initiate new programs and the reluctance for some community groups to draw attention to themselves were specifically reported as barriers.

States and territories have made substantial use of the existing NPS grant programs to successfully complete NRHP listings of properties in diverse communities – though staff capacity to administer grants is a serious issue.

Fifty percent of respondents have used the NPS Underrepresented Communities (URC) grant program, 17% of have used the African American Civil Rights grant program, and 23% have taken advantage of both programs. Two respondents indicated that they used the NPS Paul Bruhn Historic Revitalization grant program, which supports subgrant programs that enable the rehabilitation and protection of historic properties to foster economic development of rural communities. Three respondents indicated that they have not used any of the NPS grant programs specifically designed to fund survey, documentation, and National Register listing of properties in diverse communities, but have used their annual Historic Preservation Fund apportionment to fund similar activities. Several respondents indicated that while they had not applied directly to these grant programs, they have provided guidance and assistance to other entities, including Certified Local Governments, who have received Underrepresented Communities grants, Historically Black Colleges and Universities grants, Save America’s Treasures grants, and African American Civil Rights grants.

When asked to share any successful or unsuccessful projects resulting from these grants, the majority of respondents reported projects (36) involved African American community nominations, surveys and MPDFs. There were only 6 Latinx projects or activities identified. This was followed by 3 LGBTQ+ projects, and 2 that mentioned Asian American and Pacific Islanders. None of the respondents identified unsuccessful projects.

The majority (37) of project types involved nominations to the National Register. This was followed by surveys or context projects at 13. There were 7 MPDFs identified, and 5 successful amendments to existing NR listings. There were also 5 interpretation projects reported. While this sample is far from representative for the United States as a whole, on balance it suggests that African American heritage has



been better served by grants than other categories. The results also suggest that individual nominations to the National Register dominate projects as opposed to more comprehensive surveys or MPDFs. This may simply be the result of URC requirements for a NRHP listing to result from the grant.

The staff capacity required to administer the NPS grant process is a hindrance to many states and territories – but for those able to, the resulting relationship building with communities was a positive benefit.

Respondents reported the greatest challenge with the NPS grant programs was the lack of capacity in states to administer grants. There were 11 states that signaled this

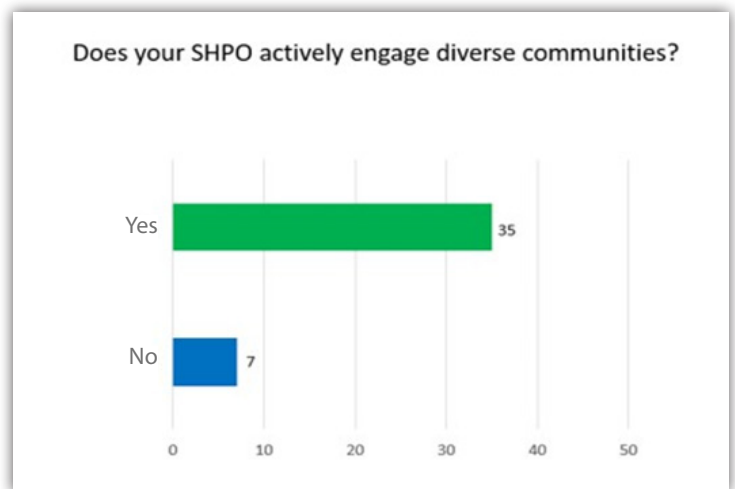
issue was a significant hindrance to applying for the NPS grants. Coupled with this were the reporting requirements and timeframes for grant completion, where 5 states felt this was a concern. One state in particular felt strongly that the Federal requirements did not take into account the state level requirements in terms of procurement, payments, etc. Three states identified the difficulty in obtaining match funding, particularly within the timescales of the grants. One felt that it would be helpful if more notice was given to make it easier to craft projects to fit the criteria. Three more states suggested that there simply was not enough funding available from the NPS to justify the time and resource commitments required for administering a grant.

In smaller numbers, there were several other challenges identified by states. These issues included the fact that a grant for a survey or context might not generate any viable properties for inclusion on the National Register. A similar concern revolved around the lack of historical data about underrepresented communities from which to assess the needs for a project. Two states suggested that more is needed to broaden the reach of the grants to more underrepresented communities, since the majority of projects are centered solely upon African American resources. Another issue identified was the limited ability to meaningfully reach out to communities and get their buy in, and that of property owners, within the timeframes of the grants. Several respondents mentioned that more support is needed for underrepresented communities in the nomination and grant writing processes. In effect, it was felt that these grant opportunities were not accessible without professional expertise or support. Some states also expressed a desire for a grant program focused upon workforce development in the preservation field targeted to underrepresented community members.

The challenges notwithstanding, there were also a number of positive aspects of the grant programs called out. The largest benefit of the programs was that they encouraged relationship building with communities, and co-production of projects. Three states mentioned that these projects also helped broaden and even change people's viewpoints through public education. Finally, in terms of future preservation efforts, 3 states identified just simply getting new data on underrepresented community resources as a major benefit.

Most States and Territories actively engage diverse communities through community relationship building and partnerships.

When asked what tools, policies, or best practices they find successful in engaging diverse communities, the majority of responses included some variation on creating a true partnership with and developing relationships with



diverse communities. Specific suggestions in this vein included engaging with the community at a time and place convenient to community members, rather than requiring the community members to come to the SHPO; participating actively in neighborhood-sponsored activities; getting to know the neighborhood on walks, tours, and site visits; helping community members understand "the system"; and taking the time to listen to their needs rather than make assumptions.

Several responses recommended the establishment of, or partnership with, councils or advisory boards which may focus on African American or Native American culture, history, issues, or heritage. Including diverse members on the state National register review board was also suggested.

Additional responses suggested targeting National Register listings and grant awards, including CLG grants, for diverse resources; involving diverse groups in a statewide conference; having SHPO staff or interns dedicated to outreach; using social media to reach diverse or under-served groups; and engaging tribes through Section 106 consultation.

In terms of what types of engagement/partnerships they find most fruitful in identifying, supporting, and celebrating heritage broadly (without necessarily relying on NPS processes or standards), respondents indicated a range including nonprofits, historical societies, underrepresented groups or boards, Main Street programs, local governments, and THPOs. Events celebrating local places or directly engaging diverse audiences and under-represented communities ("heritage month", bike and walking tours, festivals, heritage trails, historical markers); social media; and educational and programmatic outreach were also identified as successful engagement strategies. Other respondents mentioned student and youth engagement as assisting in the overall goal of diversifying the field and suggested that Semiquincentennial activities can be a good opportunity for engagement and celebrating diversity. One state has an informal "history collabora-

tion” which involves networking and sharing information with history related groups (SHPO, statewide nonprofit, archives, libraries, historical societies, partner agencies), which is also helpful in sensitive or political issues.

There are some examples of work being done outside the NPS and SHPOs to recognize diverse communities or properties.

Many respondents mentioned local and state preservation organizations or historical societies are reaching out, surveying, and conducting their own research with under-represented resources; others mentioned university research projects, cemetery preservation groups, local planners and the American Planning Association, and other programs focused on heritage more broadly.

Despite outreach, there are still properties and communities being left out – and there is more that could be accomplished with additional funding.

The general sense among respondents was that a whole range of properties are not being recognized, but that more NRHP nominations could be prepared with additional support for staff, outreach, and research, and through application of Criteria A, B, and D. In addition to reaching traditionally underserved racial, ethnic, tribal and LGBTQ communities, additional support could help with the survey and identification of properties associated with the recent past, sites of importance to the disabled community, rural sites and sites that have substantially changed over time. There was also a recognition that additional support would enable the revision of countless existing nominations that may be missing significant aspects of history.

Respondents noted that outreach and funding are key to creating partnerships as is being accessible to all constituents, building relationships and understanding within communities about the benefits of preserving heritage. Integrating preservation into local planning, as well as conducting the research, survey, and restoration work that are necessary to preserve our broader heritage are also very important. Other respondents also highlighted the need for recognition of intangible heritage or cultural and social significance beyond just integrity, age, and architectural quality.

Other Observations

With so many open-ended questions in the survey, there were a number of additional comments and questions posed that the committee felt were important to capture. Below is a summary:

- **Survey issues.** NPS requires that all funded survey lead to NR listings - are all states treating this as a literal requirement? Survey in itself is an important tool

in building our understanding of diverse communities and their unique significance, integrity, associations, etc. SHPOs need all the help they can get funding survey. Would NPS funds ever support reconnaissance or intensive level documentation for properties that would not meet NR criteria, but are culturally significant? Can NPS be open to a wider range of HPF eligible documentation?

- **Grants management.** SHPOs want to use the NPS special grant opportunities but often lack fiscal/grants staff to manage those. How could the management and reporting be streamlined? Could management and reporting be combined with the annual HPF reporting process?
- **Outreach capacity.** SHPOs express that they need outreach positions to be able to really engage with communities. Can HPF funds be used for this? Should HPF apportionments to all states provide funds for an “under-represented communities outreach coordinator”? These coordinators could become a valuable national network; NPS and a range of partners could collaborate on training and best practices.
- **Ignorance of community history.** Lack of a broad understanding of why every community’s heritage matters can be an issue with other state and federal agencies, and SHPOs lack the contacts in local communities to help make the case for heritage conservation.
- **National Park Service outreach.** The National Register is a program of NPS - if we agree that there is structural bias that needs to be addressed, then where does that change/leadership come from? NPS? SHPOs? NPS is never out in the communities.
- **What is relative where?** What is “diverse”, “underserved”, or “underrepresented” varies from state to state or within states. What is the audience? Is this linked to geography? Rural vs. urban? Rich vs poor?
- **Heritage trails/byways.** (example: Harriet Tubman UGRR): We can contextualize and link sites together even when little is extant. A focus on these types of networks may lead to forms of awareness, protection, and designation in ways we can’t currently predict.

International Interviews and Viewpoints

Understanding that the challenges recognizing historic properties experienced in the United States may be shared by our colleagues in other countries, in late 2021, the subcommittee also reached out to a select group of international counterparts in the English-speaking world to learn more about their programs. Professor James Reap, Director of the Master of Historic Preservation program at the University of Georgia, an active member of the International Council of Monuments and Sites (ICOMOS), for-

mer member of the Board of Trustees and Fellow of US/ ICOMOS, and past president of the ICOMOS Committee on Legal, Administrative, and Financial Issues, provided introductions to these individuals. Below is a set of key takeaways from our interviews:

Canada

Marc Denhez, attorney, retired judge, and one of the founding members of the ICOMOS International Scientific Committee of Legal, Administrative, and Financial Issues

Designation of properties in Canada is enabled by federal legislation, providing the Federal Environment Minister the power to recognize historic places of importance as national historic sites. This designation, however, is commemorative in nature and does not afford any protection. Designation and protection occur at the provincial level, and each province establishes its own criteria.

Similar to the United States, Canada has recognized there are segments of the population that are underrepresented in the designation process. New federal legislation is expected very soon that would enact changes to the designation of historic sites and the protection they are afforded. That legislation, however, has been drafted internally, not through a public process.

United Kingdom

John Lawson, Archaeology Officer with the City of Edinburgh Council

In the UK, all listed buildings fall into three categories of national designation which are maintained by each national preservation agency:

- A (Grade I): national significance
- B (Grade II): regional significance
- C (Grade III): local significance

(Grades A, B, C are used in Scotland; Grades I, II, III are used in England)

Alterations to listed buildings are often approved through the local planning authority; this approval may occur with or without national level consent or input. Local governments can also create their own additional lists of designated buildings or conservation areas. There is no minimum age for designation. Anyone can nominate a site, but the national government does the research and legwork and completes the legal process of listing. If rejected, nominations have to wait several years before being resubmitted.

Difficult or controversial listings include sites related to the "Travellers", more recent buildings (for example, Brutalist), or battlefields where the location is known but the landscape has been either totally obliterated or significantly altered since the event.

The controversial removal of a statue of slave trader Edward Colston from its pedestal in Bristol in June 2020 led to new legislation to protect statuary and monuments. "Retain and explain" is now the preferred approach, and under the new law, "individuals who want to remove any historic statue, whether listed or not, will now require listed building consent or planning permission."

Australia - National

Duncan Marshall, Heritage Architect

Similar to the US, Australia is a federation of states and territories under a national government. Land use powers generally rest with the state rather than the federal level. The standard toolkit that was established in legislation or grew over time included registers, statutory independent expert authority, dedicated government staff, protection mechanisms (often through the development permitting process), incentives, and outreach programs.

State and territorial heritage registers have evolved over time from a focus on buildings to now encompass archaeological sites, landscapes, and objects. Additionally, the definition of heritage has evolved beyond a focus on history and architecture to encompass other types of significance such as scientific or research value, social, or community-based value. Most jurisdictions address Indigenous sites, although Indigenous sites also have their own separate legislation. In Victoria, there is now a state level Aboriginal heritage council which is likely to be indicative of a journey toward Indigenous ownership and management of sites, picking up on the UN Declaration on the Rights of Indigenous People.

At the Commonwealth level, the "National Heritage List" designates natural, historic, and Indigenous places of outstanding significance to the nation. In theory, designation provides a high level of protection. The list is about 17 years old and currently includes about 119 sites. World Heritage properties are automatically listed, with each of its component sites listed individually on the National Heritage List. The listing process is quite complex starting with a preliminary and a final "priority assessment list." Properties must apply to be on the list and then be approved to go through an assessment process. The initial nomination itself, which only requires basic information, can be prepared by anyone or any entity, and the age of the site is not a limiting factor. The Department of Agriculture, Water, and the Environment, however, does additional research and the Australian Heritage Council, a group of 7 experts across the three "environments" (natural, historic, and indigenous), make a recommendation to the Minister about listing. A final political decision can take a long time.

Almost all heritage systems in Australia struggle with staff-

ing, expertise, funding, and political pressures. In many cases the thematic survey work done in the past is no longer being done. Previously, federal funding supported survey work by state and local governments, sometimes with matching requirements. The national government also produced thematic studies of national scope (e.g., lighthouses, post offices). Most of that work is now twenty to thirty years old, and re-survey and a gap analysis is needed to address more than just architecture and design.

The priority assessment list process is cumbersome, accentuated by resourcing and management problems, and this limits the number of nominations. In addition, some listed sites are very large - the West Kimberley is an area the size of England, with a diversity of heritage. The National Heritage List cannot deal with serial sites (component sites) – a group of sites cannot be listed as a single site but must be listed individually. This would be an easy legislative fix but never seems to be prioritized.

Obtaining listing consent can be difficult in Indigenous communities. There are also methodological issues such as the need to recognize various Indigenous groups as individual cultures. The destruction of Aboriginal rock shelters in Western Australia by international mining interests was controversial and created a lot of energy, parliamentary inquiry, and interest in heritage in general. There was also enthusiasm to amend the national legislation, and a legislative review was undertaken, though it is not clear if any change will result.

Australia – New South Wales

Sonia Limeburner, Manager of Heritage Programs, Heritage New South Wales, Australia

As in the US, listings first focused primarily on colonial and architectural resources in more urban areas. Now, Aboriginal cultural heritage is a focus; and LGBTQ history and frontier conflict history are themes in Heritage Designation program research.

There are seven criteria for listing on the Register in New South Wales (NSW), four of which are similar to the four criteria for evaluation for listing on the US National Register of Historic places that focus upon significant events, persons, distinctive characteristics, or likelihood of yielding important information. It is notable, however, that natural history is identified as well as cultural history. The three additional, and broader criteria in NSW that are not present in the US are:

- a. an item has strong or special association with a particular community or cultural group in NSW for social, cultural, or spiritual reasons
- b. an item possesses uncommon, rare, or endangered aspects of NSW's cultural or natural history

- c. an item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places, or cultural or natural environments

A property has to meet one or two of these criteria and have integrity. There is no minimum age requirement, and nominations must include comparative examples of similar resource types. The statement of significance in a nomination is the important part of the nomination and forms the basis for future regulation.

Listing properties on the Register is a three-part process. NSW does not have a survey program, so nominations are prepared by the public, local governments, and local organizations. They are then reviewed by technical experts who have been appointed by the Minister for History. After the review, nominations are forwarded to the Minister to be formally listed on the Register

There is no legal requirement in NSW to consider owner objection. However, in practice, the Minister does consider owner objection because listing does trigger the regulation of changes to the building, its landscape, or a change in use.

Despite having broader criteria for designation, the NSW office is not well-resourced, and despite some efforts to increase diversity of resources on the Register, there is a concern that they are not reaching new audiences. For example, they have had challenges bringing together Aboriginal communities and heritage, and their place-based register (rather than event-based) has been difficult to identify places associated with LGBTQ and other social histories. They have started to address this through thematic investigations and programs and, recently, the Premier has started a Blue Plaque program similar to the UK model to recognize significant events and people that are not place-based or physical, with a simple application process.

Recognizing there is an education divide in the nomination process, NSW is trying to simplify it. Instead of being reactive, they are looking at the possibility of first issuing a Request for Expression of Interest to see who might be interested in nominating a property. Then, based upon who is interested, NSW would provide assistance in developing the nomination. Additionally, new legislation is expected shortly that will address Aboriginal heritage, the Register, and financial incentives for heritage preservation.

VII. Policy Subcommittee Report: Legal and Regulatory Issues

This committee met four times from June through November 2021, including once with representatives of the National Register program at the NPS. The subcommittee reviewed the National Historic Preservation Act of 1966 (as amended and codified in title 54) and the relevant regulations in 36 CFR Part 60. (Several excerpts are included in Appendix A) The committee also had access to the raw data collected in the SHPO survey by the Best Practices sub-committee. Several members also participated in the interviews with stakeholders conducted by the External Affairs Committee. Based upon this information, the Policy Subcommittee identified three key issues:

- 1. Integrity:** In recent years, there has been increasing public frustration that the National Register program does not allow for recognition of places of cultural significance that may not retain integrity as traditionally understood, but that may hold deep importance and meaning to groups and communities that are frequently underrepresented and lack the resources or influence to preserve their historic places of importance. These groups have expressed desire for formal, national recognition for the properties that represent their history, even if they would not meet NRHP integrity thresholds as currently applied across the program.
- 2. Documentation:** Over the last 40 years, the documentation perceived to be required for National Register nominations has expanded. The net result is that the program has become increasingly inaccessible to the public for two primary reasons: 1) the needed or perceived expertise necessary to develop lengthy contextual histories and statements of significance to meet NPS expectations, and 2) the high costs of nomination preparation by a professional consultant. At the same time, additional areas of significance, particularly for diverse communities may reveal themselves after additional research and study is completed. This leads to a conundrum – how much is necessary to list a property, and how much is necessary to make sure something significant isn't overlooked? Conversely in a meeting with the NHDAC, the NPS shared that the level/amount of documentation they typically receive in nomination packets is frequently unnecessary. It is believed that in some cases this dissonance may be that state review boards are frequently populated by academics who bring a more rigorous expectation of what historical documentation should entail than is perhaps strictly necessary for the NRHP program. Another possible cause is that some SHPO NRHP staff — es-

pecially those with long tenure of service — have also developed increased expectations based on their review board or individual NPS reviewer's expressed preferences.

- 3. Traditional Cultural Property:** The current existing structure of the NRHP program does not adequately account for Traditional Cultural Properties (TCPs) and other places of significance to tribes and other communities. Further, under the National Register regulations SHPOs and state review boards have the traditional review and approval role in the nomination process for TCPs – a responsibility for which they may lack expertise.

In 1992 Congress amended the National Historic Preservation Act to allow for THPOs to assume the duties of the SHPO on "tribal lands," which are defined in the Act as lands within the boundaries of a reservation, and adjacent Indian communities. The amendments also included a requirement that under the Section 106 process federal agencies shall consult with any Indian tribe and Native Hawaiian organization broadly on properties of religious and cultural significance (54 USC § 702706), with no distinction between tribal and non-tribal lands. Because of this situation, if a federal undertaking is impacting a property of religious or cultural significance to tribes located off of tribal lands (or on tribal lands where there is no THPO), the SHPO must still exercise their statutory responsibilities in the National Register process despite a lack of tribal knowledge, potentially presenting a conflict and contradicting tribal interests. This problem has been further exacerbated by the inclusion of a provision in the 2016 Centennial Act that amended language in the NHPA to require direct nominations of properties on federal land to be reviewed by SHPOs prior to submission to the Keeper's office.

VIII. NHDAC Recommendations for Consideration

Based upon the research, outreach and analysis performed by the NHDAC and its subcommittees, below are a set of possible recommendations for discussion and consideration to improve access to and the process for listing on the National Register. It should be acknowledged that there was discussion about whether continued expansion and evolution of the National Register program over time could go too far – making it difficult to address the diverse needs and resulting public policy approaches necessary to preserve buildings, landscapes, archaeological sites, indigenous sites, traditional cultural places, and intangible heritage. There also was a fair amount of debate on the overall goal of the National Register itself – is it to tell the full story, is it to be a list of sites worthy of preservation, and what to do if there is little or nothing physical left to preserve. Therefore, while these recommendations are focused predominantly on the National Register program itself, it could still be that for some cases the best solution for some types of resources would be a new and/or additional program that provides recognition but may not include all the physical characteristics and corresponding treatment standards that accompany the existing National Register program.

National Register Criteria

- **Consider adding new criterion for recognition of places of cultural significance that may not retain integrity as traditionally understood, but that may hold deep importance and meaning to groups and communities.** There is considerable difference of opinion on this issue – with some believing a new criterion would be beneficial, and some believing the existing criteria are sufficient but require improved guidance such as looking beyond archaeological resources for Criterion D. To explore this further, we encourage the NPS to form a working group, comprised of NPS staff, SHPO and THPO representatives, tribes, Advisory Council on Historic Preservation (ACHP) representatives, National Trust for Historic Preservation (NTHP) representatives, and representatives of other national historical and archaeological associations to consider whether a new criterion for listing these types of properties in the NRHP, as provided by the National Historic Preservation Act of 1966, (Section 302103(1)), is warranted. Any resulting recommendations should also include input from diverse community stakeholder groups. Adding a new criterion would not require that the Act be opened and amended; rather, it could be accomplished through a regulatory change to 36 CFR 60,

and as updates to National Register Bulletins 15 and 16.

This change would require conversations with the ACHP and federal agencies to consider and address potential implications for Section 106 determinations of effect. Some modification or clarification of ACHP regulations could become desirable/necessary. The Secretary of Interior's Treatment Standards for Historic Properties may also need some revision or perhaps even a new standard to guide the preservation of such properties. Part of the review process would also have to include a determination whether the selection of this criteria alone for a nomination is appropriate to prevent its use solely to access more lenient treatment standards. There would also need to be a discussion about the potential impacts upon the historic tax credit program.

- **Consider new criterion and documentation standards for TCPs.** We likewise encourage the NPS to form a working group, comprised of NPS staff, SHPO representatives, THPO representatives and non-THPO tribes and Native Hawaiian groups, ACHP representatives and other national historical and archaeological associations, to consider a new criterion and documentation standards for listing or determining eligibility of TCPs and other sites of cultural importance to the NRHP, as provided by the National Historic Preservation Act of 1966 (Section 302103(1)). Adding a new criterion would not require that the Act be opened and amended, rather, it could be accomplished through a regulatory change to 36 CFR 60 and as part of the planned updates of Bulletins 15, 16 and 38.

As with the preceding recommendation, conversations with the ACHP and federal agencies to address potential implications for Section 106 evaluations of effect as well as an examination of the Secretary of Interior's Treatment Standards would be necessary.

- **Consider new criterion or other tools for indigenous cultural sites.** We encourage NPS to form a working group, comprised of NPS staff, SHPO representatives, THPO representatives and non-THPO tribes and Native Hawaiian groups, ACHP representatives, and other national historical and archaeological associations, to consider a new criterion and documentation standards for listing indigenous cultural sites, as provided by the National Historic Preservation Act of 1966, (Section 302103(1)). However, if protection, but not necessarily listing, is the desired outcome, the National Register is not likely the best tool, and a new or additional register or listing

program should be explored as should working with FPOs and legislators to identify creative co-management agreements, easements, protected areas, or other tools that allow tribes some control over public lands that contain sacred sites.

National Register Guidance

- **Expand and update existing guidance for preparation of National Register nominations.** The National Register Bulletins are dated; as noted by multiple respondents, several bulletins present conflicting guidance. To achieve a goal of greater accessibility, and to help to make sure our historic places “tell the full story,” we urge the NPS to consider re-formatting the Bulletins through early broad stakeholder and diverse public engagement to be more accessible to the general public, particularly Bulletins 15 and 16. Bulletin 38 (TCPs) in particular needs to be revised to address tribal concerns regarding confidentiality of information and documentation requirements and to help to distinguish between TCPs and properties with “challenging integrity”, so it is clear whether to evaluate under Criterion A, B, or D. Guidance should also be provided as to how to collaborate and involve communities early in the listing process.
- **Create new guidance for Landscapes.** Although there are bulletins for “Designed Historic Landscapes,” and one for “Documenting Rural Historic Landscapes, there is no bulletin specifically covering Cultural Landscapes or, “Landscapes” in their entirety. A new specific bulletin covering landscapes more comprehensively could make this complex concept more accessible, particularly for non-built environment resources, and for nominations including multiple resource types.
- **Expand and update guidance for evaluating aspects of integrity.** With so many concerns raised over the process of evaluating aspects of integrity, we believe that re-writing the guidance and providing updated training is essential to make it clear that *not* all seven aspects of integrity need to be present for a nomination to be viable. For example, including examples of how properties with compromised physical integrity can successfully achieve listing with more emphasis on feeling and association would greatly enhance. Additionally, what constitutes “integrity” needs to be defined recognizing that marginalized communities may be the subject of resource demolition and erasure, which itself may be a significant characteristic informing “integrity”. Therefore, the guidance should recommend involv-

ing members of the community in the development of what defines “integrity” relative to a nomination.

- **Promote and provide guidance for existing tools to address places where little or no integrity exists.** We observe that an update and additional education on the application of Criteria Consideration F for commemorative properties and what constitutes a site would help address places where a lack of integrity or presence of physical characteristics exist. It may also be of benefit to increase the promotion of state historic marker programs that can provide recognition but not require the same level of integrity, documentation and/or protection.

National Register Documentation, Survey and Training

- **The NPS should develop videos and/or webinars that provide more detailed information regarding documentation expectations and requirements**—and also specifically addressing what is *not* required. This webinar would ideally be presented to each state review board individually by its assigned NPS NRHP reviewer, providing an opportunity for Q&A and conversation.
- **Increase peer interaction between NPS, THPO, and SHPO National Register Reviewer staff.** We encourage the NPS, THPOs, and SHPOs to foster greater peer interaction through a wide variety of means to help collaborate on best practices, identify trends, communicate policy and guidance changes, and to help reduce inconsistencies. Regular informal virtual roundtables and meetings should take place among those who are key in the process.
- **Reconsider existing documentation requirements.** Some question whether it is necessary in today’s digital photography age to prepare a thorough written architectural description. Striving for technical terms can be a frustration for even the most seasoned author – and is not practical for the average person to accomplish. Others find the architectural descriptions to be vital in explaining what might not be understood purely visually. The NPS should consider convening representatives from SHPO offices, THPO offices, consultants, state review boards and other stakeholders to consider how much information should really be necessary to make the case for National Register listing. Additionally, some question whether the amount of information needed for a potential tax credit project should be the same as for a nomination for a private residence.
- **End or clarify NPS requirement that HPF funded surveys must lead to National Register nomina-**

tions. This requirement frequently questioned by SHPOs and SHPO staff, seems illogical and contrary to one of the most fundamental responsibilities of SHPOs to survey their jurisdiction for historic properties, regardless of outcome. The survey process can take an extended time – and can lead to a variety of outcomes. We urge the NPS to give greater latitude to SHPOs to prioritize funding as they see fit to survey and identify the historic properties in their jurisdictions and to pursue National Register nominations when and if it makes sense to do so – not because the NPS requires them to.

- **Consider developing unified, simplified, and streamlined eligibility determination processes for public use that helps set expectations up front and allows both applicants and SHPOs to identify and prioritize historic resources.** The use of “determined eligible” designations can aid in Section 106 and local development projects and foster greater protection and consideration of historic resources across the board, and not as a “showstopper” far down a project timeline.

Increased Funding

- **New dedicated funding for SHPO Staff and NPS field assistance for National Register preparation.** Dedicated funding for each SHPO to focus on National Register nominations and outreach and education to underserved communities is sorely needed. Few SHPOs have the capacity to be wholly proactive in the listing process and instead must rely largely upon being reactive. Additionally, the NPS once had National Register staff embedded in regional offices to work with communities to assist in authoring nominations. Local outreach by National Register staff may assist them in better understanding the important resources and preservation priorities for the states that they review.
- **Pilot program to produce 1-3 new historic contexts per year.** To ensure the inclusion of underrepresented communities, the NPS could fund a collaborative pilot program with SHPOs, non-profits and state universities to produce 1-3 new historic contexts per year. With this approach, if people without technical expertise wanted to nominate a property, it would make it easier for them to do so through a Multi Property Documentation Form (MPDF). Any person or group would just need to place that property within the historic context, thereby corroborating the nomination rather than requiring the nominee to research and write Section 8 from scratch. Because so few underrepresented histories in historic

preservation are, by definition, strictly established histories, they need to be supported by evidence, otherwise, we run the risk of setting the projects up to fail. More guidance may need to be developed to assist individuals in completing a MPDF tied to the context in this way, and what would constitute a reasonable amount of documentation.

- **Funding to Revise and Update Older National Register nominations.** For a variety of reasons, older nominations in many cases focused entirely upon physical characteristics or only partial aspects of a historic property’s significance. In some cases, expediency called for only the minimum research necessary to make a property cross the finish line to listing. In some cases, painful or more controversial aspects of a property’s history were omitted. As a result, many nominations are now viewed as incomplete and in need of updating. Funding is needed to revisit nominations to be sure they tell the complete story of the particular place in question. This effort will additionally allow for the update of statistical data so that more accurate measurement of the content and scope of the National Register can be achieved.

Indigenous Population Autonomy

- **Explore ways to provide Tribes and Native Hawaiian Organizations (NHOs) more autonomy in the National Register eligibility and listing process.** The NHPA, as amended, requires SHPOs to perform a specific role in the National Register listing and eligibility process. When it comes to Tribal and Native Hawaiian resources, however, SHPOs do not necessarily have the knowledge or expertise required for appropriate consideration. Further, at times, SHPO involvement may present a conflict with the government-to-government consultation required in honoring the sovereignty of Tribes. SHPO comments or concurrence should be invited but not be required for a National Register nomination or determination of eligibility *originating* from tribes and NHOs – provided all federally required property owner notification and objection provisions are fulfilled by the Tribe or NHO.

Achieving this goal, however, may require revisions to the NHPA and, subsequently, to both ACHP and NPS regulations. Special care will be required to achieve balance in the need for Tribes and NHOs to be able to identify and list their own places of cultural and religious significance with the need to account for both state and private rights and interests.

Increase Diversity in Staff and Volunteers

- **Strive for cultural and professional diversity on state and local review boards.** Because these boards are typically made up of volunteer appointees, extra efforts should be undertaken to make these boards reflective of the populations they serve. A reasonable balance should be struck between credentialed historians with technical expertise and representatives of the impacted constituencies that may or may not have the same level or perhaps differing expertise.
- **Strive for cultural diversity in staff.** There is a well-known shortage of professionals entering or remaining in the field of historic preservation – particularly from underrepresented groups. As a field, we should increase dialogue with academic programs to help improve curriculums and to support the recruitment and retention of more diverse candidates. We should also support internship, fellowship, and other opportunities to bring students and emerging professionals into preservation. Additionally, we should examine whether the Professional Qualifications Standards may serve as a barrier to entry for potential candidates from diverse communities. In doing so, we should also consider the various dimensions of diversity including racial, cultural, economic, geographic and gender – to be sure the field of historic preservation is accessible to all Americans.

Public Education, Outreach and Involvement

- **Collaborate, assist or encourage partnership directly with diverse and grassroots communities in the preparation of National Register Nominations.** The best way to assure a complete nomination that considers the interests and values of a community is to work directly with them and meaningfully involve them in the process. (See Funding recommendation above)
- **Highlight funding opportunities for diverse communities.** It is very unclear in many grant opportunities, how and if they could be used to increase underrepresented histories from diverse communities. Specifically calling this out or highlighting the fact would help increase inclusivity.
- **Develop educational and training materials in simple terms for the public. Most of the preservation field's documents are geared towards the practitioner and are highly technical.** Given that the greater public does not understand what the

National Register is, how it differs from local designation, what protections exist or do not, or what the process for either is – there is a tremendous need for educational material in simple language and, where appropriate, translated into different languages. This effort would improve accessibility and counter misinformation.

Increase Focus on and Support for Local Designation Programs

- **Encourage the establishment of local registers where protections are needed but extend to sites that may not meet National Register criteria.** Local designations often reflect the values and interests of a local community. Although many rely upon or borrow heavily from the National Register process, local registers should not by design be directly connected to the National Register process and should instead use the state CLG program to help tailor designation criteria to local environment/culture/priorities and avoid using National Register criteria verbatim.
- **Increase investment in and visibility of Certified Local Government (CLG) program.** While not every local historic district is a CLG, many are. The CLG program remains one of the primary connection points between the national historic preservation program and local programs. Investment in CLGs with an eye towards providing greater educational and technical expertise, as well as a public education program to differentiate between local designation programs and the National Register is sorely needed.
- **Improve access to CLG program.** Many states have reported tremendous difficulty in providing what little funding they have available to CLGs. The application and reporting requirements and other administrative duties are considered to be a major barrier by many CLGs. The NPS should convene a working group consisting of SHPOs, CLG Coordinators and CLG representatives to examine the program parameters and granting requirements (including the pass-thru requirements) to make sure access is efficient. There should also be a way for a SHPO to provide programmatic direct assistance benefiting multiple CLGs at once rather than forcing one CLG to act as the recipient.

Further Study & Consider Recognition of Cultural Heritage

While we believe the preceding recommendations would go a long way to improve the accessibility and inclusiveness of the National Register as a tool to recognize historic places, we recognize it may still not be an effective

tool for recognizing purely cultural or intangible heritage even though the NHPA calls out “culture” as an area of significance. Can the National Register process be altered to recognize both? Should it? Would a different program allow for the intrinsic differences between physical and intangible heritage to each be accommodated and treated appropriately? Given the expertise needed to evaluate the physical characteristics of and preservation methods for a historic place is very different than it is with culture, folkways, traditions or practices, should there be a different program with corresponding criteria, guidelines, treatment measures and regulatory/policy implications?

We believe these very important questions deserve more research and debate perhaps beginning with a national summit of stakeholders singularly on this topic with a goal of developing an informed consensus-based framework for action.

Relevant sections of NHPA:

Title 54 § 302103. Criteria and regulations relating to National Register, National Historic Landmarks, and World Heritage List

The Secretary, in consultation with national historical and archeological associations, shall—

(1) establish criteria for properties to be included on the National Register and criteria for National Historic Landmarks; and

(2) promulgate regulations for—

(A) nominating properties for inclusion on, and removal from, the National Register and the recommendation of properties by certified local governments;

(B) designating properties as National Historic Landmarks and removing that designation;

(C) considering appeals from recommendations, nominations, removals, and designations (or any failure or refusal by a nominating authority to nominate or designate);

(D) nominating historic property for inclusion in the World Heritage List in accordance with the World Heritage Convention;

(E) making determinations of eligibility of properties for inclusion on the National Register; and

(F) notifying the owner of a property, any appropriate local governments, and the general public, when the property is being considered for inclusion on the National Register, for designation as a National Historic Landmark, or for nomination to the World Heritage List.

Title 54 § 302104. Nominations for inclusion on National Register

(a) **NOMINATION BY STATE.**—Subject to the requirements of section 302107 of this title, any State that is carrying out a program approved under chapter 3023 shall nominate to the Secretary property that meets the criteria promulgated under section 302103 of this title for inclusion on the National Register. Subject to section 302107 of this title, any property nominated under this subsection or under section 306102 of this title shall be included on the National Register on the date that is 45 days after receipt by the Secretary of the nomination and the necessary documentation, unless the Secretary disapproves the nomination within the 45-day period or unless an appeal is filed under subsection (c).

(b) **NOMINATION BY PERSON OR LOCAL GOVERNMENT.**—Subject to the requirements of section 302107 of this title, the Secretary may accept a nomination directly from any person or local government for inclusion of a property on the National Register only if the property is located in a State where there is no program approved under chapter 3023 of this title. The Secretary may include on the National Register any property for which such a nomination is made if the Secretary determines that the property is eligible in accordance with the regulations promulgated under section 302103 of this title. The determination shall be made within 90 days from the date of the nomination unless the nomination is appealed under subsection (c).

(c) **NOMINATION BY FEDERAL AGENCY.**—Subject to the requirements of section 302107 of this title, the regulations promulgated under section 302103 of this title, and appeal under subsection (d) of this section, the Secretary may accept a nomination directly by a Federal agency for inclusion of property on the National Register only if—

(1) completed nominations are sent to the State Historic Preservation Officer for review and comment regarding the adequacy of the nomination, the significance of the property and its eligibility for the National Register;

(2) within 45 days of receiving the completed nomination, the State Historic Preservation Officer has made a recommendation regarding the nomination to the Federal Preservation Officer, except that failure to meet this

deadline shall constitute a recommendation to not support the nomination;

(3) the chief elected officials of the county (or equivalent governmental unit) and municipal political jurisdiction in which the property is located are notified and given 45 days in which to comment;

(4) the Federal Preservation Officer forwards it to the Keeper of the National Register of Historic Places after determining that all procedural requirements have been met, including those in paragraphs (1) through (3) above; the nomination is adequately documented; the nomination is technically and professionally correct and sufficient; and may include an opinion as to whether the property meets the National Register criteria for evaluation;

(5) notice is provided in the Federal Register that the nominated property is being considered for listing on the National Register that includes any comments and the recommendation of the State Historic Preservation Officer and a declaration whether the State Historic Preservation Officer has responded within the 45 day-period of review provided in paragraph (2); and

(6) the Secretary addresses in the Federal Register any comments from the State Historic Preservation Officer that do not support the nomination of the property on the National Register before the property is included in the National Register.

(d) APPEAL.—Any person or local government may appeal to the Secretary—

(1) a nomination of any property for inclusion on the National Register; and

(2) the failure of a nominating authority to nominate a property in accordance with this chapter.

Title 54 § 302303. Responsibilities of State Historic Preservation Officer

(a) IN GENERAL.—It shall be the responsibility of the State Historic Preservation Officer to administer the State Historic Preservation Program.

(b) PARTICULAR RESPONSIBILITIES.—It shall be the responsibility of the State Historic Preservation Officer to—

(1) in cooperation with Federal and State agencies, local governments, and private organizations and individuals, direct and conduct a comprehensive statewide survey of historic property and maintain inventories of the property;

(2) identify and nominate eligible property to the National Register and otherwise administer applications for listing historic property on the National Register;

(3) prepare and implement a comprehensive statewide historic preservation plan;

(4) administer the State program of Federal assistance for historic preservation within the State;

(5) advise and assist, as appropriate, Federal and State agencies and local governments in carrying out their historic preservation responsibilities;

(6) cooperate with the Secretary, the Council, other Federal and State agencies, local governments, and private organizations and individuals to ensure that historic property is taken into consideration at all levels of planning and development;

(7) provide public information, education, and training and technical assistance in historic preservation;

(8) cooperate with local governments in the development of local historic preservation programs and assist local governments in becoming certified pursuant to chapter 3025;

(9) consult with appropriate Federal agencies in accordance with this division on—

(A) Federal undertakings that may affect historic property; and

(B) the content and sufficiency of any plans developed to protect, manage, or reduce or mitigate harm to that

property; and

(10) advise and assist in the evaluation of proposals for rehabilitation projects that may qualify for Federal assistance.

Title 54 § 302702. Indian tribe to assume functions of State Historic Preservation Officer

An Indian tribe may assume all or any part of the functions of a State Historic Preservation Officer in accordance with sections 302302 and 302303 of this title, with respect to tribal land, as those responsibilities may be modified for tribal programs through regulations issued by the Secretary, if—

(1) the Indian tribe's chief governing authority so requests;

(2) the Indian tribe designates a tribal preservation official to administer the tribal historic preservation program, through appointment by the Indian tribe's chief governing authority or as a tribal ordinance may otherwise provide;

(3) the tribal preservation official provides the Secretary with a plan describing how the functions the tribal preservation official proposes to assume will be carried out;

(4) the Secretary determines, after consulting with the Indian tribe, the appropriate State Historic Preservation Officer, the Council (if the Indian tribe proposes to assume the functions of the State Historic Preservation Officer with respect to review of undertakings under section 306108 of this title), and other Indian tribes, if any, whose tribal or aboriginal land may be affected by conduct of the tribal preservation program, that—

(A) the tribal preservation program is fully capable of carrying out the functions specified in the plan provided under paragraph (3);

(B) the plan defines the remaining responsibilities of the Secretary and the State Historic Preservation Officer; and

(C) the plan provides, with respect to properties neither owned by a member of the Indian tribe nor held in trust by the Secretary for the benefit of the Indian tribe, at the request of the owner of the properties, that the State Historic Preservation Officer, in addition to the tribal preservation official, may exercise the historic preservation responsibilities in accordance with sections 302302 and 302303 of this title; and

(5) based on satisfaction of the conditions stated in paragraphs (1), (2), (3), and (4), the Secretary approves the plan.

Title 54 § 302706. Eligibility for inclusion on National Register

(a) IN GENERAL.—Property of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization may be determined to be eligible for inclusion on the National Register.

(b) CONSULTATION.—In carrying out its responsibilities under section 306108 of this title, a Federal agency shall consult with any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to property described in subsection (a).

(c) HAWAII.—In carrying out responsibilities under section 302303 of this title, the State Historic Preservation Officer for Hawaii shall—

(1) consult with Native Hawaiian organizations in assessing the cultural significance of any property in determining whether to nominate the property to the National Register;

(2) consult with Native Hawaiian organizations in developing the cultural component of a preservation program or plan for the property; and

(3) enter into a memorandum of understanding or agreement with Native Hawaiian organizations for the assessment of the cultural significance of a property in determining whether to nominate the property to the National Register and to carry out the cultural component of the preservation program or plan.

II. THE NATIONAL REGISTER CRITERIA FOR EVALUATION

CRITERIA FOR EVALUATION:

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and as sociation, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.

CRITERIA CONSIDERATIONS:

Ordinarily cemeteries, birthplaces, or graves of historical figures, proper ties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties *will qualify* if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- α.* A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
 - β.* A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
 - c.* A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his or her productive life; or
 - d.* A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
 - e.* A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
 - f.* A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
- A property achieving significance within the past 50 years if it is of exceptional importance

Appendix C: A Historiography and Analysis of Selected Writings Related to the National Register of Historic Places

This Historiography consists of over 140 academic, and professional and popular articles focusing on historic preservation and the National Register. The publication dates range from 1965 to the present, with over half of the reviewed articles written after the turn of the 21st century. The methodology used was a search of JSTOR for the terms “national register” and “historic preservation” for articles referencing the National Register or Historic Preservation in their title, subject, keywords, or body. Many resources were amalgamated based on empirical references as the subcommittee conducted research, as well as references contained within academic resources from the JSTOR search. This is only a sampling of historic preservation scholarship spanning five decades and should not be considered a comprehensive study of Historic Preservation. It does not include oral presentations from local, state, and national conferences, nor articles from local community or state newsletters which were undoubtedly important in the rapidly developing field. It also may not include articles addressing the many fields encompassed by historic preservation such as articles focused on archeology, urban or landscape historic or architecture that may have included discussions of the National Register or Historic Preservation Issues. The following discussions are not meant to be definitive or all-inclusive. Rather they address conclusions drawn from the articles surveyed.

The Birth of the National Historic Preservation Program and a National Register of Historic Places as defined in Selected Historiographical sources.

Massive publicly funded development in the decades following World War II fueled by interstate freeway construction and urban renewal resulted in large scale demolition of existing neighborhoods. In reaction to widespread negative reactions by citizens all over the country, entities such as the National Trust for Historic Preservation and Colonial Williamsburg began organizing in collaboration with the National Park Service. This effort ultimately led to a presidential task force created by President Lyndon B. Johnson and a Congressional Special Committee on Historic Preservation. President Johnson’s message to Congress was clear:

In almost every part of the country citizens are rallying to save landmarks of beauty and history. The Government must also do its share to assist these local efforts which have an important national purpose. We will encourage and support the National Trust for Historic Preservation.... I shall propose legislation to authorize supplementary grants to help local authorities acquire, develop, and manage private properties for such purposes.¹

The Special Committee on Historic Preservation published its findings and recommendations in a book entitled With Heritage So Rich (1966).² In particular, the publication promoted the ideology for a “new preservation”:

If the preservation movement is to be successful...it must go beyond saving occasional historic houses and opening museums. It must be more than a cult of antiquarians. It must do more than revere a few precious national shrines. It must attempt to give a sense of orientation to our society, using structures and objects of the past to establish values of time and place....

[T]he new preservation must look beyond the individual building and individual landmark and concern itself with the historic and architecturally valued areas and districts which contain a special meaning for the community....

In sum, if we wish to have a future with greater meaning, we must concern ourselves not only with the historic highlights, but we must be concerned with the total heritage of the nation and all that is worth preserving from our past as a living part of the present.³

1 "Natural Beauty of Our Country," H. Doc. 78, 89th Congress, Feb. 8, 1965.

2 A Report of a Special Committee on Historic Preservation under the auspices of the United States Conference of Mayors was published under the Chairmanship of Rep. Albert Rains, former Chairman of the Housing Subcommittee in the United States House of Representatives. Considered today to a foundational document in the establishment of our Federal Historic Preservation Program, the findings in the report formed the basis of the National Historic Preservation Act of 1966 (NHPA).

3 With Heritage So Rich (New York: Random House, 1966), pp. 207-08.

Amongst the key recommendations published in *With Heritage So Rich* was the proposed creation of a comprehensive "National Register" administered by the National Park Service to be developed from federal and state historic property surveys.⁴ This recommendation ultimately found its way into the National Historic Preservation Act (NHPA), which directed federal agencies to consider the effect of undertakings on historic properties. Lady Bird Johnson noted at the time:

We must preserve and we must preserve wisely. As the report emphasizes, in its best sense preservation does not mean merely the setting aside of thousands of buildings as museum pieces. It means retaining the culturally valuable structures as useful objects: A home in which human beings live, a building in the service of some commercial or community purpose. Such preservation ensures structural integrity, relates the preserved object to the life of the people around it, and not least, it makes preservation a source of positive financial gain rather than another expense.⁵

The legislation also provided an evaluation process to determine if properties were worthy of preservation and eligible for listing in a National Register of Historic Places on national, state, and local levels. The preamble in the NHPA also reiterates the "new preservation" approach from *With Heritage So Rich*, asserting that 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."⁶

Passage of the NHPA represented a major shift in historic preservation rationale. Prior to the passage of the NHPA, historic preservation was generally understood to mean the protection of "grand architecture" or "great men" and the "places where they were born or buried."⁷ In contrast, the new historic preservation philosophy that shaped the NHPA focused on buildings of broad significance at the national, state, or local levels.

Although the legislative history shows that the discussion relative to the NHPA and the NRHP at the time was almost exclusively about buildings, the impacts of urban renewal, and ways to provide financial incentives for their protection,⁸ the use of these tools began to expand almost immediately. As federal regulations, environmental laws and state and local statutes were written that reply upon a property's NRHP listing status or eligibility in planning processes to determine whether they are worthy of preserving, and as cultural values and interests expanded and evolved, so too did the NRHP.

The 1960s, After Passage of the NHPA

Despite the legislation reflective of this "New Preservation," the historiography reveals the tumultuous underpinnings of the conflict between the two schools of thought became apparent right away. Once again, turning to the NHPA's legislative history, during a Senate hearing prior to its passage, Senator Henry (Scoop) Jackson noted:

The clamor at the local level to preserve everything is going to be great, especially when they find out about a program of this kind, even though they would not qualify as historic sites. Could you indicate what kind of study will be made and what standards will be used to make sure the truly qualified projects will be recommended?

To which National Park Service Director George Hartzog responded:

...we believe that the program envisaged...can be measured creatively in historic preservation through a mechanism of the maintenance of a national register of historic sites, buildings, and objects...the key, it seems to me, for making sure that these programs do not overlap, and that we do not get in properties that are not worth the expenditure in terms of the preservation and presentation of our history, is this register's

4 Mackintosh, Barry. *The National Historic Preservation Act and The National Park Service: A History*. Department of the Interior, Washington DC. 1986.

5 *With Heritage So Rich* (New York: Random House, 1966), pp. vii-viii.

6 National Historic Preservation Act (1966). Signed into law by President Lyndon B. Johnson on October 15, 1966.

7 Rogers, "Fulfilling Its Mandate: The National Park Service and Historic Preservation," *The Public Historian*, Spring 1987.

8 Lambe, "Legislative History of the National Historic Preservation Act of 1966"

responsibility.⁹

Subsequently, in a review of the National Register of Historic Places of 1969, Joseph A. Baird Jr., who leaned towards a more conventional view, questioned the new preservation concepts espoused by *With Heritage So Rich* and the NHPA, writing of the National Register that "[o]ne cannot crowd all of history into one category."

Why are two ships included in such a register? And why several wildlife refuges? I do not mean to imply that such things are not to be preserved, but if a former salmon canning site and a lumber site are historic, why not one of the San Francisco Bay ferries or, to push this to ridiculous extremes, an Indian reed canoe.¹⁰

There was also an early discussion captured in Congressional records during a 1966 Senate NHPA hearing that indicated some intention to limit the ability for nominations to be made by states. This hesitation was based on fear of overwhelming the workload capacity of the Secretary of the Interior's Advisory Board on National Parks, Historic Sites, Buildings, and Monuments. However, this discussion went no further, and nominations began rolling in.¹¹

The 1970s

As the Civil Rights, Equal Rights, and environmental movements intensified in the 1970s, a focus upon a "new social history" gained momentum among historians, representing a growing voice in American scholarship. Rather than focusing on "great men" of history, social historians examined—or more accurately—re-examined large patterns of history and its intersection with ordinary people, often through the lens of race, class, gender, and soon after, nature. American academia increasingly embraced studies that explained perspectives that popular history omitted. The new social historian for example focused on the resiliency of enslaved people and placed women alongside men in the nation's historical experience. Environmental historians and their interdisciplinary counterparts in geography, sociology, biology, art, and natural sciences introduced the concept of a "Sense of Place," which allowed historians to understand better the multifaceted connection between people, communities, places, and environment.

Within the backdrop of the Vietnam War, one of the most influential historical interpretations of the 1970s was the renewed focus on indigenous lands and people which moved America's history beyond the one-dimensional cowboy narratives of the Old West. The introduction of new ethnohistorical approaches began to look at the impact of colonization from the perspective of Native America. This school of thought explained Western expansion not as Manifest Destiny but as a continental conquest. Likewise, environmental historians made compelling arguments about how diseases rather than cultural or technological superiority allowed Europeans to successfully colonize much of the world.

With the new academic approaches offering powerful contextual significance to a multitude of properties, the Historiography shows a growing acceptance of the National Register as an important historic preservation tool in the 1970s. Terms such as "Archaeology," "Historic Archaeology," "Landscape Architecture," and "Urban Renewal" entered the preservation lexicon. In 1973, the renowned western historian Robert Utley and NPS Historian declared, "The most important of these tools [to protect archeological sites and other cultural environs] is the National Register of Historic Places."¹² Supported by new, more diverse historic contexts, historic preservationists in the 1970s argued that archeological sites should be considered for listing in the National Register beyond the archaeology-focused Criteria Consideration D.

Meanwhile, the 1970s scholarly literature also reveals the emergence of applied or "Public History" and the rejection of the seemingly aloof and impractical "Ivory Tower" history. Articles in the Historiography articulate a growing concern that American intelligentsia was secluded, privileged, and disengaged from the world's everyday struggles and strife. Within the context of historic preservation, the tension between utilitarian significance and properties of solely artistic

9 Lambe, "Legislative History of the National Historic Preservation Act of 1966," p. 73.

10 Baird Jr., Review: "The National Register of Historic Places 1969," by United States Department of the Interior, National Park Service, *California Historical Quarterly*, 1971.

11 Mackintosh, Barry. *The National Historic Preservation Act and The National Park Service: A History*. Department of the Interior, Washington DC. 1986.

12 Utley, "Archeology and the National Register," *Historical Archeology*, 1973.

or fine workmanship reflect the larger dialogue between applied and more esoteric history. In 1978, for example, in describing the very real threat of environmental degradation, David A. Clary wrote:

In refusing to respond to the needs of the real world beyond the specialized circles of their discipline, historians not only acquiesce in the possible deterioration of our national patrimony but may be writing their own professional epitaph.¹³

It is also worth noting that the 1976 Tax Reform Act created the first federal income tax incentives for preservation and called upon the Secretary of the Interior to review rehabilitations of historic structures and to approve those rehabilitations that preserve a building's historic character. Given the requirement that tax incentives could only be offered for substantial rehabilitation of National Register-listed buildings, this legislation forever changed the landscape of National Register nominations. According to the Rutgers/NPS-Annual Report on the Economic Impact of the Federal Historic Tax Credit for Fiscal Year 2021, as of 2021, over 47,000 buildings have been rehabilitated using tax incentives, a significant percentage of the buildings listed in the National Register. The resulting \$199 billion in private investment through the tax incentives program from 1976 to 2021 demonstrates how historic tax credits continue to represent by far the most powerful economic incentive tool available for historic buildings in the country.

The 1980s

By the 1980s, new emphasis and methodologies in historical scholarship provided a wealth of new interpretations and historic contexts for historic preservation. American history had become more practical, interdisciplinary, specialized, and inclusive, evidenced by the inclusion of the subfields of African American history, ethnic history, labor history, women's history, urban history, environmental history, and others. Even public history programs—which taught history beyond the "Ivory Tower" through public platforms such as museum exhibitions, film and documentaries, material culture, monuments, and historic preservation—emerged as a subfield and degree program in many major universities across the nation.¹⁴

The Historiography shows that intellectual conversations around topics such as "archaeological significance and the National Register," "ethnicity and architectural heritage," "historic preservation and the academic establishment," and "the interdisciplinary nature of social history and architectural documentation" continued throughout the decade.¹⁵ Most importantly, the scholarly literature in the 1980s includes a surge of articles focusing on legal aspects of historic preservation and its professionalization and institutionalization through the growing field of Cultural Resource Management.

Although the term has its origins in the late 1960s, it is not until the 1980s that the term "cultural resource management" appears in Historiography.¹⁶ Tensions still existed between historians and non-historians, but, by the 1980s, progress had been made:

The involvement of the historical profession in historic preservation is still in its adolescence. Like adolescents, historians working in preservation move in a world not of their making. The rules and procedures governing the implementation of historic preservation policy were created largely by non-historians with little or no consideration of historians' interests. Also, like adolescents, some historians adopt rebellious rhetoric, but in the end, most try to function within the exhibiting system.¹⁷

13 Clary, "Historic Preservation and Environmental Protection: The Role of the Historian," *The Public Historian*, 1978.

14 The inclusion of public history, even begrudgingly in some academic programs, was the result of social history's embracement as well as introduction of Cultural Resources.

15 See Timothy C. Klinger and L. Mark Raab, "Archaeological Significance and the National Register: A Response to Barnes, Briggs and Nielsen," *American Antiquity*, 1980; Richard K Dozier, "Caretakers of the Past: Blacks Preserve Their Architectural Heritage," *American Association for State and Local History*, 1981; Larry E. Tise, "Revising Priorities: Preservation Joins the Establishment," *American Association for State and Local History*, 1981; and Sharon Celsor, "Preserving the Complete History: Preservationists, folklorists, and social historians combine their research methods," *American Association for State and Local History*, 1984.

16 Ronald W. Johnson, "The Historian and Cultural Resource Management," *The Public Historian*, 1981. Also see: Carol M. Rose, "Preservation and Community: New Directions in the law of Historic Preservation," *Stanford Law Review*, 1981; Elizabeth A. Lyon "Cultural and Environmental Resource Management: The Role of History in Historic Preservation," *The Public Historian*, 1982.

17 Theodore J. Karamanski, "Logging, History, and the National Forests: A Case Study of Cultural Resource Management," *The Public Historian*, 1985.

Several articles from the 1980s, characterized as retrospective and mostly celebratory, reflect on the 20th anniversary of the NHPA, while others look to the future with the introduction of computers as a new preservation technology. Some focus on the increasing importance of landscapes—both urban and rural—as a preservation tool. Interestingly, several articles focus on maritime history, as an example of diversity and inclusion, using that very phrase:

They need look no further than the maritime community, which has always been the earth's most diverse and cosmopolitan population. Seagoing vessels are where Caucasians, Asians, and Africans, worked together for centuries melding ethnic and cultural traditions, where lords interacted with peasants as a matter of conquests, enrichment, and survival, and where the products of one continent were carefully curated for enthusiastic consumers half a world away.¹⁸

As an example, the approach to "New Maritime History," reflects the influences of one of the most persuasive movements in American Historiography in the 1980s—New Western History. New Western Historians tapped into the interdisciplinary concepts of the social historians and recast the study of American frontier history by focusing on race, class, gender, and nature in the trans-Mississippi West. The New Western Historians argued that Old Western History focused only on the perspective of white male settlers and left out narratives of women, Native Americans, racial and ethnic minorities, and the negative impact of extractive industries on the environment. Rather than a "process" or waves of continental western movement, New Western Historians explained the frontier as a meeting place where various indigenous groups, Europeans, Americans, Asians, Africans, Latinos, and women interacted and exchanged ideas, religions, customs, languages, and struggled for economic and cultural legitimacy.

The 1980s also hint at the influence of cultural history on historic preservation. Marking a major analytical shift in American historiography, the postmodern movement presented the first real challenge to social history's dominance. Instead of historical interpretation based on straightforward reading of primary sources, cultural historians looked for meaning in cultural communication, social constructs, and systems of representation.

The 1990s

In the last decade of the 20th century, terms such as "underrepresented" and "integrity" were spotlighted in the scholarly literature. For example, NPS Historian Barbara J. Little opined in 1997:

U.S. national programs for historic preservation have a great influence on public memory and commemoration. Decisions about what may be listed in the NRHP or designated an NHL may commemorate or silence parts of the past. Historians invoke the concept of Integrity as a gatekeeper to control access to these lists. Archeologists have the opportunity to contest some of the imposed silences and make these lists more inclusive of underrepresented groups.¹⁹

Moreover, the scholarly literature in the 1990s begins to show the influence of historic preservation on the academy. For example, in 1993, the Organization of American History applauded the NPS's efforts to create themes focused on place-based curriculum for teaching American history.²⁰

Meanwhile, the academy began looking more seriously at the historian's role in everyday American life. And, although they found that people turn to the past "as a way of grappling with profound questions about how to live," most Americans did not appear to trust professionally trained historians. Researchers pointed to a disconnect between understanding history as "an interpretation of the past based on critical analysis of primary sources" and the past as "built on multiple sources such as oral tradition, popular culture, and commemorations that fulfill diverse social and political needs."²¹ While historians saw themselves as experts, the role of the historian outside of the classroom seemed limited.

By the turn of the 21st century, the rising number of history professionals in non-academic fields such as historic

18 Joel Stone (ed.), *Interpreting Maritime History at Museum and Historic Sites*, Rowman & Littlefield, 2017.

19 Barbra Little, "Archaeology, History, and Material Culture: Grounding Abstractions and Other Imponderables," *International Journal of Historical Archeology*, 1997.

20 Teaching with Historic Places (Beth M. Boland and Fay Metcalf) *OAH Magazine of History*, 1993. Also See Keeping Women in Their Historic Places: Bringing Women's Stories to the Classroom (Beth Boland) *OAH Magazine of History*, 1997.

21 Rosenzweig and Thelen, *The Presence of the Past: Popular Uses of History in American Life*, 1998.

preservation (as well as park interpretation, archives and libraries, local historical societies, and museums and art galleries, etc.), illuminated the close connection between historical scholarship and the public realm. This prompted renowned American historian and president of the American Historical Association, Joyce Appleby, to ask, "Should we all become public historians?"²²

The 2000s - present

After the turn of the 21st century, while American historians turned to transnationalism and examined the American experience through a global lens, historic preservationists maintained public history's practice of local history. And, even though public history had been institutionalized since the 1980s, by the 2000s, more American universities had adopted programs amplifying the historian's role in public spaces. With over half of the articles/book chapters—71 total—published between 2000 and 2021, the *Historiography* indicates the mutual acceptance between historic preservation practitioners and academic historians. The result marks the maturing and legitimacy of historic preservation as a fully accepted academic field with a rich body of scholarship pertaining to philosophical principles and practices all its own.

Underpinning all of this is debate over just how to quantify the job the National Register is doing at recognizing the full history of all Americans. Regularly cited in articles represented in the *Historiography* as evidence of the National Register's shortcomings in recent years is an often-quoted statistic from 2014 suggesting that less than 8% of the 95,000 listings are associated with women, Latinos, African Americans, or other minorities. Although nobody disputes that there are deficiencies, it is important to note feedback from the Chief of the National Register of Historic Places and National Historic Landmarks Program in a recent policy briefing, citing the way in which National Register information and metadata have been collected and recorded has indeed changed and evolved over the years. It is apparently not straightforward to extract information and data from five-plus decades of work and thousands of National Register nominations to generate needed statistical data. For example, nomination preparers may elect (or have elected in the past) "to specify a category or subcategory of significance not currently on the official working list."²³ Thus the inability to track legacy data has created an underreported amount of nominations associated with underrepresented communities. Some nomination preparers may have selected "Politics/Government" or "Social History" or "Ethnic Heritage" as the area of significance and not have specified a subcategory, such as "Black" or "African American." In the absence of accurate data, how can success be measured when the common sentiment is that this is an issue that must be measured with qualitative and quantitative data?

The influence of academic history speaks to another issue highlighted in the *Historiography* that challenged the National Register—integrity. Integrity is spotlighted a 2002 dialogue between Professor Judith Wellman and Keeper of the National Register, Carol D. Shull. Wellman poses the question: How to document historically significant events that do not retain architectural integrity?" To which Shull responded, "It is important to remember that the National Register was established as part of a program to preserve historic places, not simply to commemorate them."²⁴

Many of the articles published after 2000 show the continuing influence of historical trends, such as new western history, environmental history, labor history, and cultural history.²⁵ For example, the scholarship addresses "decolonizing" the National Register for the first time.²⁶ Cameron Logan's "Beyond a Boundary" suggests that designations in urban areas, such as historic districts, are systemically racist,²⁷ and by 2012, the term "social justice" appears.²⁸

Articles and book chapters published in the last two decades begin to criticize the centerpiece of the NHPA—the

22 Joyce Appleby, "Should We All Become Public Historians?" *Perspectives on History: The News Magazine of the American Historical Association*. March 1, 1997.

23 Frear, *Briefing Statement FY 2021*, National Park Service.

24 Shull, "The Underground Railroad: Refining Eligibility Criteria." *The Public Historian*, 2002. Emphasis supplied.

25 Native American Sacred Places and the Language of Capitalism by Adam Fish, *Future Anterior: Journal of Historic Preservation, History, Theory, and Criticism*, 2005; and When Nature Becomes Culture: The National Register and Yosemite's Camp 4, a Case Study (Andrew Kirk and Charles Palmer) *Western Historical Quarterly*, 2006; and Beyond the Boom/Bust Cycle (Lea S. Glaser) *Western Historical Quarterly*, 2010; Donaldson, "Placing and Preserving Labor History," *The Public Historian*, 2017.

26 Steps toward Decolonizing the National Historic Preservation Act (Dongoske and Pasqual), *Bending the Future*, 2016

27 Beyond a Boundary: Washington's Historic Districts and Their Racial Contents (Cameron Logan) *Urban History Review* University of Toronto Press, 2012.

28 Paul A. Schackel, "A Historical Archaeology of Labor and Social Justice," *American Anthropologist*, 2013 pp. 317-320.

National Register. Some of the arguments describe the flawed technical application of the "50-year rule" and other criteria considerations. The 50th anniversary of the NHPA produced a plethora of articles on the National Register, much of it critical. For example, historian and academic researcher Michael Allen rhetorically asked, "Is the National Register of Historic Places Helping or Hindering Legacy City Preservation?" Allen's answer is that in most urban neighborhoods, historic district nominations are not possible given the voids left by urban renewal from the 1960s and 1970s when many then-historic properties were demolished. "Fractured neighborhoods don't stand a chance of becoming historic districts," lamented Allen, "...no matter how hard communities push. The National Register privileges appearance over community will, public commemoration, and economic value."²⁹ Like most critiques written for the 50th anniversary, Allen's article vocalizes an "anti-preservationist" postmodern history and speaks to the irony that the National Register was intended to save such demolitions from occurring in the first place.

Within the backdrop of political polarization and the extraordinary nationwide protest sparked by the death of George Floyd and the rise of social justice movements such as Black Lives Matter, several recent works have taken a more direct look at historic preservation in the context of race.³⁰ Meanwhile, the Historiography shows the increase of new media covering historic preservation stories, especially those focusing on social injustice and racial inequality.³¹

Debate continues about the role of integrity in more recent commentary. In 2017, NTHP staff member Susan West Montgomery argued that reducing the focus on integrity represented historic preservation's pathway forward:

The National Register must fully recognize the broad spectrum of cultures, experiences, and stories that are embodied within the physical environment of our communities. It should be comprehensive and integrated.... Overemphasis on architectural distinction and Integrity misses the opportunity to embrace the full range of historic and cultural resources that could educate, unite, and empower Americans, and contribute to our economic and social vitality.³²

In *Crafting Preservation Criteria: The National Register of Historic Places and American Historic Preservation*, National Park Service Historian John Sprinkle argues that the NPS itself continues to struggle with the concepts of integrity and authenticity. In going back to the first NPS staff charged with administering the program, Ernest Connally, who served as Director of the Office of Archaeology and Historic Preservation, Sprinkle explains:

With the passage of the National Historic Preservation Act, the nature of definition of integrity changed. Recognizing that one of the goals of the National Register was to provide a vehicle through which deserving properties received financial assistance, Ernest Connally suggested that integrity had 'to be judged in a kind of relative context' and that being 'too strict' would slow the growth of the recognition program. Connally saw 'tension' between the goals of recognition and rehabilitation, and the definition and application of standards of physical integrity.³³

Then in 2014, when the National Park Service Advisory Board looked into the origins of the concept of integrity and authenticity, they consulted the *Leopold Report* from 1963 that defined cultural and historical authenticity:

The capacity of a historical object or setting to be an accurate representation of a specific cultural time and place, revealing meaning and relevance of the object to its 'parent' culture or context, and displaying a genuine and realistic connection to factual historical events. Authenticity – of material objects or intangible heritage like traditional harvesting practices – is multidimensional and rarely absolute. Some attributes of authenticity might be intact (such as the materials in a historic building) while other attributes may have been

29 Is the National Register of Historic Places Helping or Hindering Legacy City Preservation? (Michael R. Allen) NTHP Forum, 2014.

30 In May 2020, associate professor of historic preservation Jeremy C. Wells delivered a paper entitled "10 Ways Historic Preservation Policy Supports White Supremacy and 10 Ideas to End It," Kenyatta McLean authored the book, *Reclaiming Time and Space: Bringing Historical Preservation into the Future*, Sara Driskell and Sophie Trawalter wrote *Race, Architecture, and Belonging: Divergent Perceptions of Antebellum Architecture*, and Grace Mitchell Tada and Walter Hood edited *Black Landscapes Matter*.

31 Examples include Tony Frangie Mawad's "Latino Heritage Sites Need to Be Protected, Too," by City Lab and Caleb Gayle's piece in the Atlantic entitled, "The Neighborhood Fighting Not to Be Forgotten."

32 Taking the National Historic Preservation Program to the Next Level (Susan West Montgomery) NTHP Forum Journal Fall 2016/Winter 2017.

33 Sprinkle, *Crafting Preservation Criteria: The National Register of Historic Places and American Historic Preservation*, National Park Service, 2014. pp. 61-62

substantially altered (such as the functional use of the building or its community context).³⁴

Common Issues Identified Within the Historiography

Scholarly and popular writing critical of the NRHP program, particularly in the last decade, fall into several major themes or points of concern:

I. Evolution of reflective thought regarding the National Register and its purpose.

- Who defines what is significant? What is significant?
- Why does a property need to have integrity to be preserved?
- Over reliance on the nomination as the only tool in tax credit and compliance reviews.
- Is the National Register the proper tool for protecting properties?

II. Process Issues and Technical Aspects of the Nomination

- Should we re-examine the documentation standards required for nominations?
- Criterion Consideration G is difficult to support and is subject to broad interpretation.
- Period of significance can be arbitrary – especially 50 year "rule" for properties with ongoing uses or development (e.g., historic districts which continuously evolve over time).
- Amendments should be easier – ability to add more information without revisiting entire nomination, particularly for resources that continue to evolve.
- Easiest to go with the most obvious area of significance leaves out the full history.
- Readdress the need for certain form fields that may not be relevant for a given nomination.
- "Unwritten" rules and misleading guidelines such as additional scrutiny being applied to nominations with discontinuous district boundaries, separate periods of significance, relocated properties, associated persons not being deceased, etc.
- Agreement that a nomination must have supported and researched history. The minimum level of achieving this should be more pragmatic and accessible to lay researchers.

III. Access to the Process

- Technical aspects are onerous for the average person. "Mom and pop" nominations are common, but many SHPOs do not have adequate staff capacity to fully assist shepherding such nominations through the process.
- Reliance on professionals to participate.
- Increasingly high cost of nominations discourages participation by individuals and communities.
- General lack of diverse representation (in SHPOs, NPS, advisory boards) limits varied perspectives and trust that the process will result in equitable outcomes.
- Need to promote diversity, equity, and inclusion in entire process.
- Guidance at every level (local, state, federal) is informed by a top-down approach rather than one that is informed by grassroots efforts.
- Need for greater funding, i.e., more contexts, proactive surveys, SHPO Staffing, etc.

IV. Focus on physical Integrity

- Discourages review or investigation beyond visual appearance.
- Primacy of historic appearance in evaluation.
- Over-reliance upon architectural integrity-driven evaluations for all Criteria.
- Is a detailed Section 7 description necessary when a good set of images can provide and document the visual appearance?
- Seven aspects of Integrity: Need more intentional focus on Integrity of location, feeling and setting, rather than materials, workmanship, and design (sub-elements of form, plan, space, structure, style, function, spatial organization, massing, proportion, scale, materials, color, texture). The definitions of these aspects of Integrity have been scrutinized for focusing too intently on a specific period of time or by ignoring iterative changes over time.

Appendix D: List of Selected Writings Consulted

Number	DATE	ARTICLE/AUTHOR	Source	Resource Type	Keywords	NOTES/Quotes
1.	undated	Preservation and Social Inclusion, various authors	Columbia GSAPP		Too many gatekeepers, not enough shepherds	Authors call for a “Preservation Reckoning” chapters provide a how to “Action Agenda”
2.	undated	Locating Value: making significance in the historical built environment, a trans-Atlantic review (Gareth Hoskins)	unknown		significance is subjective; need experienced professionals to document	All places are valuable but some are more explicitly valuable than others. How then do we decide which are most precious and most worthy of public esteem? How is that distinction experienced, identified and ultimately awarded by practitioners? This project involved collaboration with a number of US and UK preservation agencies to investigate the operation of value in practices of listing, landmarking and designation. It involved archival work, interviews, focus groups and ethnography. The project does not advocate for the value of built heritage per se, but rather examines the various mechanisms by which value is located. The endeavor to “locate” value tells us something about the nature and operation of value more generally. The findings are presented in four sections. The first section undermines two orthodoxies central to the functional legitimacy of the preservation sector: an ontological orthodoxy, that is, a belief in the existence of value itself as an intrinsic, essential property; and an epistemological orthodoxy: a belief in the possibility of value’s precise and accurate detection. While the contingency of value has long been recognized in critical scholarship, value’s role in establishing ‘equivalence’ is consistently denied and/or obscured by the institutions that presume to measure it. But value is relational and operates in a zero-sum game. It cannot be infinitely amassed since every attribution leads also to a disavowal. Section two explores how denial of ‘zero-sum’ in the preservation sector leads to a paradoxical attempt to expand even in a crisis of accumulation. Section three illustrates the political influences, skews and biases coded in to apparently neutral and objective assessment protocols, and section four examines how value is experienced ‘on-site’ by practitioners who gauge significance by calling on emotional forms of attunement

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3.	2021	10 Ways Historic Preservation Policy Supports White Supremacy and 10 Ideas to End It by Jeremy C. Wells			18.41.	<p>(PAPER INCLUDE NUMBERS LINKS TO OTHER SIMILAR ARTICLES especially regarding issues of monuments)</p> <p>Using these ten problem areas, this paper then makes a recommendation for ways to solve some of these issues, with a central recommendation that the National Park Service and the Advisory Council on Historic Preservation need to open up the rule-making process around the National Register of Historic Places and the Secretary of the Interior’s Standards. These federal agencies also need to create and support a platform for widespread engagement with a diverse public in addressing these issues. A secondary theme is to support people-centered changes to historic preservation policy, including more flexibility around what have often been dogmatic approaches to significance and integrity. Lastly, the end of this paper presents a table that gives example arguments that support White supremacy in preservation policy and some potentially useful responses</p>
4.	2021	Briefing Statement FY21 – Sherry Frear	n/a		NPS response, practitioner, data, underrepresentation	<p>Clarification about data collection and identifying properties associated with cultural, ethnic, or identity groups.</p> <p>Challenging to accurately characterize, by count or percentage, National Register-listed properties by association with cultural, ethnic, or identity groups because the ways in which this information has been collected by, and provided to, the National Register has changed and evolved over the decades</p> <p>INCOMPLETE DATA. Although the fields for distinguishing cultural, ethnic, and identity on the National Register nomination form have grown tremendously with the passage of time, not all nomination preparers apply them consistently. The information found on the National Register nominations are submitted by the State Historic Preservation Offices, Tribal Historic Preservation Officers and Federal Preservation Offices, and the information entered into the National Register’s tracking system reflects the categories selected by those nominating authorities. Data has not been necessarily been disaggregated.</p> <p>Example: articles could claim a statement out of context. This provides better context for the problem with <u>missing data</u>:</p>

Appendix D: List of Selected Writings Consulted

						<p>96,236 listings (as of February 2021) in the database, roughly 2,200 (3.5%) of all listings identify “Black” or “African American” as an area of significance or cultural affiliation, or identify a property as significant for its association with a Black individual. However, this is not the same as saying, “Only 3.5 percent of all listings are African American historic properties.” Some nomination preparers may have selected “Politics/Government” or “Social History” or “Ethnic Heritage” as the area of significance and not have specified a subcategory, such as “Black” or “African American.” Additionally, as noted above, a property may be significant for its association with a Black person but a person’s cultural, ethnic, or identity affiliation is not recorded in the National Register’s tracking system.</p> <p>Note: could focus on percentage of listings with “local” level of significance</p>
5.	2021	Integrity as a Legal Concept (Sara C. Bronin)	Unpublished ; will be in Upenn Press Change Over Time (2021 pending)	Journal article (unpublished)	integrity versus significance	<p>Integrity – the ability of a resource to communicate its historic significance – is a physical concern for heritage conservation practitioners. But it is also a legal concept, integral to binding judgments that determine whether and how certain resources are protected. Focusing on U.S. law, this essay articulates the contours of integrity in several contexts: designation, public obligations, private obligations, and private benefits.</p> <p>Most existing scholarship on integrity focuses on the designation process, which is the formal process by which a resource is evaluated for listing on a register of historic places. The integrity determination is a threshold issue – fundamental to historic preservation laws, which apply almost exclusively to resources actually listed on historic registers.</p> <p>Scholars have criticized the integrity requirement because they believe it bars certain types of resources from receiving legal protection. But focusing on the designation process alone may obscure the fact that the concept of integrity is embedded in other areas of law.</p> <p>After a resource is designated historic, the law protects its integrity in several ways. This essay focuses on three: laws imposing obligations on</p>

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						<p>public actors, laws imposing obligations on private actors, and laws conferring benefits on private actors. In these laws, integrity is essential to the legal obligation itself, and it is treated as formally as it is during the designation process.</p> <p>In light of that observation, preservationists must consider whether the problems they see in the designation process are also evident in the protection that designation triggers. The essay concludes that integrity, as a legal concept, may be more complicated, and more difficult to dislodge, than current scholarship suggests.</p>
6.	2021	Latino Heritage Sites Need to Be Protected, Too (Tony Frangie Mawad)	CityLab	Popular media article	opening process to public opinion and local community engagement	<p>Latino places seeking recognition and protection of historic sites significant to their culture. Latino heritage sites and monuments are disproportionately underrepresented in official lists like the National Register of Historic Places and National Historical Landmarks. In fact, fewer than 8% of designated landmarks specifically represent the histories of ethnic minorities, according to the report. The recommendations include upgrading the criteria the National Park Services uses to decide how sites get listed in the National Register, and opening the process to public opinion and local community engagement. The report also proposes setting up a permanent committee or advisory group to ensure that justice and diversity are part of the evaluation process. It recommends a study on Latino communities in the northeast region, where Latino heritage has been overlooked, as well as a “professional pipeline” to get more people from minority communities into roles that can influence decisions in historic preservation.</p>
7.	2021	The Neighborhood Fighting Not to Be Forgotten (Caleb Gayle)	The Atlantic	Popular media article	measuring integrity of changing communities and	<p>One hundred years after the Tulsa Race Massacre, community members still can’t get the federal government to recognize Greenwood’s significance</p>

Appendix D: List of Selected Writings Consulted

					understanding why changing	QUESTION: The fact that Greenwood has changed though gentrification, etc. doesn't that mean that Greenwood is significant for its association with the history of racism, discriminations and acts of violence against African-Americans?
8.	2021	In Plain Site (Craig Barton)	A Journal of Place			An exploration of the "space of public appearance" and the erasure of citizens of color from white spaces. Speech and Action on equal ground. Case study—Selma, Alabama. "Cultural landscapes tend to either neglect or actively suppress the presence and contribution of marginalized cultural communities. To recognize the people, places, and events significant to Black history in Selma, one must be cognizant of the vernacular landscape, which is defined less by patronage than by cultural practices." Edmund Pettus Bridge, Bloody Sunday, and the struggle for equal rights.
9.	2021	Race, Architecture, and Belonging: Divergent Perceptions of Antebellum Architecture (Sara Driskell and Sophie Trawalter)	University of California Press (Collabra: Psychology)	Journal article		Preserving historic buildings can have many purposes, including honoring proud moments in our history as well as acknowledging and redressing shameful ones. The preservation of Antebellum buildings, buildings with an architectural style from the pre-Civil War era that often features symmetrical brick or white-washed façades and columns in a Greek revival style, has been as especially fraught issue. In the present work, we contribute to this conversation by examining the psychological costs of preserving Antebellum buildings such as restored or preserved Plantations. In two studies (Ns=166 and 165, respectively), Black participants rated Antebellum but not New American architecture more negatively than White participants. They reported liking Antebellum architecture less and feeling less welcome in it. Further, Black (but not White) participants spontaneously mentioned racism/slavery when viewing Antebellum architecture. Interestingly, this pattern was also found for modern-built Antebellum architecture. This suggests it is not Antebellum buildings per se but Antebellum architecture and the ideologies it evokes that may be problematic. Next, we examined potential moderators of this effect. In Study 3,

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						Black participants (N=81) read about an Antebellum museum with one of two missions, one devoted to reconstructing the museum for historical accuracy, common to historical museums, and the other to addressing and informing visitors about the era’s slavery. Participants also saw pictures of either a predominantly White or Black Board of Visitors. We found that only in the addressing slavery condition with a predominantly Black board did these Black participants report liking and feeling welcome in the museum. Importantly, they felt that museum would have more influence from and be more empowering for the Black community. The present findings have implications for interventions aimed at increasing Black Americans’ engagement with and sense of ownership in public spaces associated with Antebellum architecture. They suggest that reclaiming—and not only redeeming—spaces with such histories is important.
10.	2020	Beyond Integrity: Shaping an equitable historic preservation practice	Washington Trust for Historic Preservation (This Place, Vol 3, Issue 1, Winter)		Not NR but misapplied local criteria that are nearly identical to NR criteria	2020-vol-03-iss-01-This-Place-Winter.pdf (preservewa.org)
11.	2020	Black Landscapes Matter (Grace Mitchell Tada, Walter Hood, eds)	University of Virginia Press	Book	No direct NR critique	The question "Do black landscapes matter?" cuts deep to the core of American history. From the plantations of slavery to contemporary segregated cities, from freedman villages to northern migrations for freedom, the nation’s landscape bears the detritus of diverse origins. Black landscapes matter because they tell the truth. In this vital new collection, acclaimed landscape designer and public artist Walter Hood assembles a group of notable landscape architecture and planning professionals and scholars to probe how race, memory, and meaning intersect in the American landscape.

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						<p>“Black landscapes matter because they are prophetic. They tell the truth of the struggles and the victories of African Americans in North America.... Their constant erasure is a call to arms against concealment of the truth that some people don’t want to know or see. Erasure is a call to arms to remember. Erasure allows people to forget, particularly those whose lives and actions are complicit.”</p> <p>“Imagine if the United States had built a monument at the end of the Civil War-to the end of slavery. Instead, as soon as the Civil War ended, the battlefield was declared a monument for tens of thousands of soldiers who died.... At the drawing of freedom for African Americans, their emancipation was not imagined or viewed as something worthy of memorializing.”</p>
12.	2020	The Fight To Preserve African-American History (Casey Cep)	The New Yorker	Popular media article		The struggle over the physical record of slavery and uprising in Richmond is part of a larger, long-overdue national movement to preserve African American history. Of more than 95,000 entries on the NRHP—the list of sites deemed worthy of preservation by the federal government—only 2% focus on the experience of black Americans.
13.	2020	Op-Ed: How to fix a National Register of Historic Places that reflects mostly white history (Sara Bronin)	Los Angeles Times	Popular media article		The reason for this underrepresentation is an overly technical, legalistic approach to determining what merits designation. Less than 8% of sites on the National Register are associated with women, Latinos, African Americans or other minorities.
14.	2020	Reclaiming Time and Space: Bringing Historical Preservation into the Future (Kenyatta McLean)	MIT Master in City Planning	Graduate Thesis		Historic preservation has disproportionately focused on buildings and sites that support the social construction of the white American citizen identity. This is why only 8% of the United States National Register of Historic Places and 3% of the United States National Landmarks represent people of color, women or members of the LGBT community. The discriminatory exclusivity of historic preservation projects is fueled by criteria steeped in colonial values, only recognizing relationships to space and concepts of progress traditionally held by white people. Diversity in historic preservation

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					<p>projects requires methods that are grounded in the values and work of practitioners outside of traditional preservationist networks. Ground-up and side-in approaches to preservation make visible new values for use in identifying and supporting projects that will bring historic preservation into a more inclusive present and future.</p> <p>This project begins with the history of historic preservation exploring how the elitist values of its original practitioners normalized the viewing of history through the white gaze. Within the second section, I explain some Black communities’ relationships to space and how historic preservation criteria render them as outside the “criteria of preservation.” In the third section, I discuss how concepts of progress held by many Black communities are often nonteleological resulting in them being underserved by traditional preservation tied to linear experiences of time. The last section demonstrates what diversity can look like when projects are identified through a new lens influenced by more inclusive values and identities. This was done with the analysis of four restorative project case studies using the manifesto of BlackSpace. Historic preservation can be antiracist and restorative to Black people if it is willing to expand its identity and change its values.</p>
15.	2020	Preservation and Social Inclusion (Erica Avrami, ed)	Columbia	Book, essays	<p>Takes a broad look at the entire field of historic preservation practice with a social inclusion lens, raising several points about going beyond simple representation in historic registers, and discusses both privilege represented in current practice as well as diversity issues in policy and decision making. Not exclusively about National Register, but the discussion centers directly on some of the underlying issues of how the National Register is implemented and utilized throughout the field.</p> <p>The preservation enterprise helps fashion the physical contours of memory in public space, and thus has the power to curate a multidimensional and inclusive representation of societal values and</p>

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					<p>narratives. Increasingly, the field of preservation is being challenged to consider questions of social inclusion, of how multiple publics are--or are not--represented in heritage decision-making, geographies, and governance structures. Community engagement is increasingly being integrated into project-based preservation practice, but the policy toolbox has been slower to evolve. Recognizing how preservation and other land use decisions can both empower and marginalize publics compels greater reflection on preservation's past and future and collective action beyond the project level. This requires professionals and institutions to consider systemic policy change with integrity, sensitivity, and intentionality.</p> <p>“The decisive use of space has power: it determines which publics and stories can stake a claim in the landscape and be encountered. No matter how much historical narratives are challenged or reinterpreted in prose or imagery, spatial encounters bear repeated witness to particular ideas of self and community that are profoundly experiential.”</p> <p>“The preservation enterprise helps fashion the physical contours of memory in public space, and thus has the power to curate a multidimensional and inclusive representation of societal values and narratives. This is an awesome responsibility.</p> <p>Heritage and historic preservation is socially constructed to tell stories of the past, but is fraught with the narrow perspective of those engaged in the enterprise of preservation and archaeology. Participation and representation in regulatory and authoritative decision making entities is not diverse and therefore what we are able to preserve does not accurately reflect our communities’ true diversity.</p> <p>“preservation must grapple with how its norms and standards, which privilege architectural value and material integrity, can perpetuate injustice.” Representation on historic registers is not enough to combat systemic racism.</p>
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					<p>“Architecture and integrity are often the gateways to preservation protections and benefits, but, in marginalized communities, they are an excuse for exclusion.” – Ryberg-Webster</p> <p>“the documentation standards established for National Register listing, which privilege text-based archives and photographic records, thereby discounting other, less material forms of knowledge keeping and contributing to a ‘preservation apartheid’.” – Andrea Roberts</p> <p>“By defaulting to the ways that market forces affect <i>buildings</i>, with limited focus on <i>people</i>, preservation evades important sociospatial dynamics and forgoes opportunities to systematically instrumentalize its work to achieve economic equity and inclusion.”</p> <p>Questions posed at a February 2019 symposium: 1) “How are diverse narratives and communities being represented or excluded through preservation?”; 2) Who is participating in preservation processes, and how can preservation decision-making better engage multiple publics?”; and 3) What are the effects of preservation policies and processes on communities?”</p> <p>Need to explore the impacts of historic district designation, as well. Does designation provide additional privilege to privileged communities that potentially exacerbates affordability and displacement? Does designation have a direct correlation with this, or is it coincidental given the extant privilege already present prior to designation?</p> <p>https://cup.columbia.edu/book/preservation-and-social-inclusion/9781941332603</p>
16.	2020	Uncovering the Relationship Between Historic Districts and Same-Sex Households by Kelly L. Kinahan Matthew H. Ruther	Journal of the American Planning Association		<p>Problem, research strategy, and findings: Despite established connections between the LGBTQ community and historic preservation, there is no analysis of unmarried partnered same-sex households (UPSSHs) and historic districts. Here we investigate the relationship between locally designated and National Register historic districts and demographic, socioeconomic, and housing changes—specifically, UPSSHs, racial and ethnic subgroups, and median household income—in 46 U.S. cities.</p>

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					<p>Although the U.S. Census data capturing UPSSHs are time limited and only capture one segment of the broader LGBTQ community, they are the best available national data. We find significant growth in the share of male UPSSHs from 2000 to 2010 in census tracts where historic districts were established during the 1990s. Tracts with higher shares of male UPSSHs in 2000 are more likely to establish locally designated historic districts from 2000 to 2010. Finally, we also find evidence that historic districts are significantly related to later changes in race, ethnicity, and median household income. Takeaway for practice: The results indicate that historic districts can help grow the presence of UPSSHs, one segment of the broader LGBTQ community. Planners concerned with protecting queer spaces should consider incorporating preservation-based approaches. The presence of male UPSSHs increases the likelihood of locally designated historic districts, and preservation planners should work to ensure LGBTQ social histories are included in new designations where appropriate. Our findings also suggest losses of racial and ethnic subgroups and increasing median household income after designation, indicating the need for proactive efforts from planners and preservations to help protect existing vulnerable residents. The timing of these changes is not the same for all variables; thus, planners should focus attention on both short- and long-term shifts in historic districts</p>
17.	2020	Reclaiming the past as a matter of social justice: African American heritage, representation and identity in the United States (Erin Linn-Tynen)	Critical Perspectives on Cultural Memory and Heritage		<p>Whose heritage, whose narrative? Statues and Historic places</p> <p>Through heritage – historic sites, preservation efforts, memorials and museums – communities are fighting for social justice to establish their identity and secure acknowledgement of their relevance to the present. As Del Sol has observed, ‘By rebuilding cultural identities and strengthening the narratives that people are able to tell about themselves, their families and their communities, we shift from injustice to empowerment’ (Del Sol, 2017). As evidenced by the controversy over the removal of Confederate symbols, heritage is critical to the process of identity formation. African American heritage has been overlooked or deliberately ignored as a way to assert dominance over non-white Americans. The incompleteness and misrepresentation of America’s historical narrative through heritage must be challenged. To do so, it is</p>

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					<p>crucial to question whose heritage has been – and is still being – represented and why. The institutions that determine what is, and is not, recognized as heritage have been, and continue to be, controlled by the dominant majority. However, this white bubble has been punctured, and communities and heritage professionals alike are calling for a democratization This content downloaded from 137.229.184.15 on Wed, 16 Jun 2021 00:27:56 UTC All use subject to https://about.jstor.org/terms266 CRITICAL PERSPECTIVES ON CULTURAL MEMORY AND HERITAGE of heritage. And why should there not be? If heritage is representative of our collective identities, then it can no longer be restricted to the homogenous and hegemonic narratives of the past. Heritage must reflect the heterogeneity which is the essence of the modern United States</p>
18.	2019	<p>Preservation and Place: Historic Preservation by and of LGBTQ Communities in the United States (Katherine Crawford-Lackey, Megan E. Springate,eds)</p>	Berghahn Books	Book	<p>Significant historic and archaeological sites affiliated with two-spirit, lesbian, gay, bisexual, transgender, and queer history in the United States are examined in this unique volume. The importance of the preservation process in documenting and interpreting the lives and experiences of queer Americans is emphasized. The book features chapters on archaeology and interpretation, as well as several case studies focusing on queer preservation projects. The accessible text and associated activities create an interactive and collaborative process that encourages readers to apply the material in a hands-on setting.</p> <p>Cites barriers to preserving LGBTQ sites: “...lack of financial capital, discriminatory zoning laws and practices, increased likelihood of transiency, cause the spaces associated with marginalized communities to often go unrecognized. The National Register criteria does not take into account the added challenges of nominating the places of minority communities and can, as a result, be exclusionary. This should cause professionals to reevaluate how “historical significance” is determined.” It should go beyond extant structures, as sometimes the fact that history</p>

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						has been erased and left a void speaks to why it is important to recognize that history.
19.	2019	Why Historic Preservation Needs a New Approach (Patrice Frey)	CityLab	Popular media article		What then is the path forward? As people who care about the built environment—and more importantly the people in it—let’s resolve in 2019 to launch a multi-disciplinary dialogue on the future of older buildings. This conversation must extend beyond traditional preservationists and include those in finance, affordable housing, community development, sustainability, and other fields. Let’s consider new opportunities for impact, confront uncomfortable truths about where we may be falling short, and be vigilant in our efforts to find and embrace creative new tools for preservation. The future of historic places may well depend upon it
20.	2018	Addressing the Diversity Deficit (Vincent L. Michael)	Chapter in Creating Historic Preservation in the 21 st Century	Conference white paper		To address this diversity deficit and maintain the Register’s relevancy as a primary tool for conserving the cultural heritage of the United States, the national Register must modify its tools, techniques and practices to capture better the historic and changing demographics of America.
21.	2018	Confronting Exclusion: Redefining the Intended Outcomes of Historic Preservation (Erica Avrami, Cherie-Nicole Leo, and Alberto Sanchez)	UPenn Press (Change Over Time, Vol 8, No 1, Spring 2018) pp 102-110	Journal article		The processes involved in designating historic properties have become increasingly participatory over the past quarter century, allowing more diverse publics to ascribe value to and preserve places. However, it is unclear whether such processes can ensure just and inclusive engagement and outcomes for the populations of historic districts post-designation and for other publics with a stake in preservation’s effects. This paper examines the issue of exclusion through the lens of preservation as a form of public policy. It specifically investigates the societal aims-cum-benefits that preservation is intended to achieve through legislative mandates; how regulatory criteria address these public policy aims; and how/if these aims are shared by communities. By exploring how preservation success is defined through both public policy (comparative policy review) and the public eye (online survey), this research seeks to identify opportunities for and barriers to policy reform.

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22.	2018	Preservation's Cultural Turn: Recognizing Contemporary Significance of Historic Places (Holly A. Taylor)	Creating Historic Preservation in the 21st Century (Wagner, Richard D.)	Journal article / conference paper		<p>This essay argues that thinking more broadly within the existing policy framework is not sufficient to propel preservation into the future to truly address people's relationships with historic places. Beyond thinking more broadly, we need to amend the criteria for National Register eligibility to include a criterion for social value, creating a basis in federal regulations for recognizing the contemporary cultural significance of historic places.</p> <p>Preservation in the United States is already shifting away from an overly materialist approach toward the concept of cultural conservation, based on the relationships between people and places characterized by traditional practices, collective memory, continuity of use, and shared public experiences. U.S. still lacks an explicit criterion that recognizes cultural significance or social value. Examines the process used in Australia as a comparative analysis for how to successfully develop designation criteria that include cultural and social values as a basis for determining significance and worthiness of preservation.</p>
23.	2018	Suppressed Stories and a Critique of the National Register of Historic Places: Documenting the Challenges and Obstacles of Women Architects at the Turn of the Twentieth Century (Katharine L. Hewlings)	University at Buffalo, State University of New York.			<p>The National Register of Historic Places is a resource that identifies buildings that are significant to American history. Yet it currently lacks stories that represent women's history. The sparse account of female architects within this registry is a prominent example of the suppressed histories of women architects that reveal the gender and class issues they endured in the past. Preservationists are currently attempting to broaden the scope of the past by bringing suppressed histories to light, but they need to produce the textual evidence of these accounts in order to provide an authoritative interpretation of the physical built environment. Historical research is the first step to creating a permanent record of the contributions of female architects, who are often ignored in the official history of American architecture. Such information is crucial if we are to make informed decisions about the future of key structures in the built environment. In order to better document the historic contributions of women architects, research was conducted on three case studies: Louise Bethune, Josephine Chapman and the firm of Mary Gannon and Alice Hands. These women all practiced architecture at the turn of the twentieth century in the United States and had a personal and/or professional connection to New York State. Their material contribution to</p>

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						<p>the profession ranges from tenements and factories to apartment buildings and residential homes. Through examination of these case studies, this thesis addresses the gaps in stories due to a lack of textual evidence. Toward this end, it reviews the institutional history of the National Register of Historic Places and the historical debates about significance in the archive. After the background of the National Register of Historic Places is established, it presents a critique of the inventory and nomination forms currently used in this registry. The registry was reviewed for documents from each case study. The results of the research and critique conducted in this thesis resulted in a collection of the stories of four women architects and information about the types of resources utilized for women’s history. Another important result of this thesis is that samples were created to illustrate how nominations could include gender and class issues in the writing process. This research will be of interest to scholars from gender studies, women’s history, architecture, urban planning and historic preservation.</p>
24.	2017	The Architecture of Erasure: Revisiting the Site of the MOVE Bombing through a Genre Criticism of the National Register of Historic Places (Huy Pham)	Ball State University Master’s Thesis	Master’s thesis	Subjective interpretation, white privilege, for the people, integrity requirements	<p>Lack of recognition of a racially motivated bombing of a black neighborhood in Philadelphia in 1985 (MOVE bombing). “current preservation ethic privileges cultures and histories that have physical references. To ignore this evidence is to be subservient to White dominance in place-making and history-telling.”</p> <p>“Regarding best practices, the government should preserve what its public deems a “historic site” or “worthy of preservation” – but when the government sets the standard of those terms, the public becomes subservient the needs of the government despite its democratic orientation.”</p> <p>Draws conclusion that the site has integrity and significance, less than 50, and can be listed subject the interpretation of SHPO and NPS.</p> <p>“...37 of the 40 “architecture styles” on the National Register’s database reflecting the work of White men who had the agency to create schools, start businesses, form organizations, and provide licenses and</p>

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						<p>approximately 79% of the listings citing Criterion C as the source of the site’s significance, clearly there is a hegemony force swaying the relevancy of the <i>historic places</i>...”</p> <p>Over-privileges architectural style and “works of masters” rather than an official list that “supports public and private efforts to identify, evaluate, and protect America’s historic and archaeological resources.”</p> <p>CAN “limit the public’s understanding of racialized violence and marginalized history when it is treated as a “National Register of Aesthetically Pleasing Architecture.”</p> <p>“National Register of Historic Places” and a “National Register of Places Worthy of Preservation” can yield vastly responses</p> <p>looking forward – NR CAN reduce erasure of history such as this</p> <p>rhetorically, the issue of white privilege is deeper than NR listing requirements – subject to interpretation by the practitioner which may be overrepresented in the field</p>
25.	2017	“Now that the Slums Are Fashionable”: Origins of Section 104 of the National Historic Preservation Act (John H. Sprinkle Jr.)	NTHP Forum Journal Fall 2016/Winter 2017	Article commemorate the 50 th Anniversary of the NHPA. Journal chapter		Section 104 directs the Secretary of the Interior to establish a loan guarantee program for historic properties. The origins of this nearly forgotten and never implemented legislative directive reveal a constellation of factors that were part of the national debate over gentrification, known at the time as “displacement,” and the application of the National Register of Historic Places criteria within the context of urban renewal programs during the 1970s.
26.	2017	Preservation for People: A Vision for the Future	National Trust for Historic Preservation	Report / study		As such, the National Trust for Historic Preservation took this golden anniversary opportunity to engage people throughout the country and listen to their ideas for the future. “Preservation for People: A Vision for the Future” seeks to capture those ideas, express an aspirational vision for the future of historic preservation, and give those in and aligned with our field a set of principles for moving forward

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27.	2017	Placing and Preserving Labor History (Rachel Donaldson)	The Public Historian		Labor history, social history, places of production, working class.	<p>This article focuses on the significance of sites and landscapes of labor history in public history, particularly in the fields of preservation and interpretation. Through the preservation of labor history sites, public historians can educate various audiences about the diversity of the working-class experience in the United States. Although sites of work have long been identified as historically significant, all too often the workers have been excluded from these narratives. By understanding which sites are important in working-class history and by bringing workers’ voices into the act of protecting, commemorating, and interpreting sites of labor, we can achieve a more inclusive view of labor history—one that connects these stories to the national narrative and illustrates the centrality of labor and labor activism to American history.</p> <p>“Because they are imbued with historical memories of significant events, places provide a means to catalyze social memory; and, by understanding the strong relationship between places and historical memory, preservationists and public historians can gain access to grassroots perspectives on the past. The work that labor historians have done to parse the various identities embedded within the working class, and to understand how these have shifted over time, provides a strong foundation for examining how physical spaces contributed to both forming workers’ identities and shaping their perspectives on their communities and their labor.”</p> <p><u>IMPORTANT</u></p> <p>The second tactic is to encourage public historians to use sites to illustrate specifically how labor history is concomitant to social history and how exploring shared spaces of labor history reveals the intersections among the various social and cultural groups that have comprised the working class. Sites of labor history contain multiple layers of meaning because of the inherent ethnic and racial diversity of the working class. While economic deprivation, extreme forms of prejudice, and political instability pushed immigrants and migrants to leave their homelands during the late nineteenth century through the early twentieth century, the lure of industrial jobs pulled them to the growing industrial areas, particularly in</p>
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					<p>the areas of extractive and manufacturing work. In the places of work, the spaces of community life, and the sites of union organizing, workers of various backgrounds were forced to rely on each other. These places, therefore, provide an excellent way of educating audiences on the perspectives of diverse workers and the ways in which they had to overcome cultural barriers to work and organize together.</p> <p>Although meaningful, places are not accessible to all. In industrial landscapes, social, political, and economic factors often limited freedom of access, restricting patterns of ownership, use, and movement. When confronted with this situation, historical actors responded by challenging this inequality, turning industrial landscapes into contested terrains in which different groups pressed for social, economic, and political restructuring.</p> <p>The various social groups that moved in and out of productive spaces viewed these areas in different ways; their perspectives were shaped by their cultural frames as well as their personal experiences. The places of production and working-class life, therefore, facilitate a closer investigation of the perspectives of all groups that used or occupied these spaces.</p>
28.	2017	Taking the National Historic Preservation Program to the Next Level (Susan West Montgomery)	NTHP Forum Journal Fall 2016/Winter 2017	Article commemorate the 50 th Anniversary of the NHPA. Journal chapter	<p>Evaluation of NHPA and the National Historic Preservation Trust’s set of recommendations and principles aimed at improving the program. On the NRHP she writes that “the NR must fully recognize the broad spectrum of cultures, experiences, and stories that are embodied within the physical environment of our communities. It should be comprehensive and integrated.”</p> <p>She continues to state that Overemphasis on architectural distinction and integrity misses the opportunity to embrace the full range of historic and cultural resources that could education, unite, and empower Americans, and contribute to our economic and social vitality.</p>

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29.	2017	The National Historic Preservation Act at 50: “A Living Part of Our Community Life and Development” (Thompson Mayes)	NTHP Forum Journal Fall 2016/Winter 2017	Article commemorate the 50 th Anniversary of the NHPA. Journal chapter	50 th anniversary, racial inequality, tell the full American story	<p>An exploration of the 50 years since the publication of With Heritage So Rich and it’s broader context. (Urban Renewal, highway project, New Frontier Great Society.)</p> <p>In terms of NR: There are also long-standing criticisms of the NHPA from academics and practitioners, such as the perceived inflexibility in the application of the Secretary of the Interior’s Standards and the undeniable reality that the National Register of Historic Places does not yet represent the full diversity of the American story—despite recent laudable efforts of the National Park Service to identify and nominate places important to women and LGBTQ, African American, Hispanic, Asian Pacific Island, and other underrepresented people.</p> <p>In 1966: 88% US population ID’d as white.</p> <p>Call for doing better to serve people. Very broad, not overly specific critique of NR.</p>
30.	2017	The Advisory Council on Historic Preservation at 50 (Ronald D. Anzalone)	NTHP Forum Journal Fall 2016/Winter 2017	Article commemorating the 50 th Anniversary of the NHPA. Journal Chapter		Looks historically at the ACHP and its mission: to be a federal advocate for historic preservation as a national priority and to provide an important strategy for advancing public policy.
31.	2017	Significance is Always Intangible: An Interview with the Keepers of the National Register (Susan West Montgomery)	NTHP Forum Journal Fall 2016/Winter 2017	Article to commemorate the 50 th Anniversary of the NHPA. Journal chapter	Underrepresented communities, intangible heritage, practitioners, NPS perspective, cultural traditions, associative values, application barrier, physical integrity more important for Criterion C,	<p>A discussion of favorite listings/DOE and why. Clear theme: Underrepresented Communities.</p> <p>Speak to the conflicts concerning integrity when dealing with intangible heritage or nontraditional resources.</p> <p>Placing a strong emphasis on associative values. (associative values being a place has significance if associated with people, events, or trends)</p> <p>Intangible heritage is an essential part of associative values</p>

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					<p>elements of integrity narrowly interpreted, equity, context / theme studies, cultural landscape, former Keepers</p> <p>Move away from “intense focus” on architectural integrity; more necessary to focus on physical integrity (materials, workmanship) if a Criterion C property – but properties might have cultural value and not necessarily architectural value.</p> <p>Elements of integrity work well – not the issue. A place only needs to have a few elements and not all need to be present. This could be an interpretation issue with the interpreter / reviewer.</p> <p>“we need to work to ensure that integrity standards are equitably applied and better understood.” - Shull</p> <p>When there is no there left</p> <p>NHPA intended to prevent loss of historic places “with integrity”</p> <p>Application barrier; need more samples; more context theme studies</p> <p>Historic Districts focus on architectural integrity because it’s easier to research the significance. Need to be able to more easily amend nominations with associative and cultural values</p> <p>Most controversial NR eligibility issues are tied to regulations where an interest group is trying to prevent listing, or politics become involved</p> <p>Involving the public; “having your community listed on the National Register gives you a place at the table in all sorts of decision making.” – Toothman (Nick note: but what happens if you can’t get your community listed? Do you still have a place at the table?). need to work on conscious inclusion</p> <p>Call for more public awareness (Nick note: if we have the ears of marginalized communities already, now we turn to what has integrity and what doesn’t. ultimately we still end up in a vicious cycle of telling communities who are currently inhabiting a place that the place lacks integrity and cannot be protected. Thus, we’re not serving the people here today... the 50 year and “significance” arguments force an</p>
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						overreliance on looking at what things looked like 50 years ago, not what they look like today)
32.	2017	The Unfulfilled Potential of the National Historic Preservation Act (Tom King)	NTHP Forum Journal Fall 2016/Winter 2017	Article commemorate the 50 th Anniversary of the NHPA. Journal chapter		<p>“Historic preservation isn’t about old buildings and sites, or even, in a strict sense, about preservation. It’s about respecting living people and the values they ascribe to places. It’s about trying to help people and communities fend off the damage to their emotional ecosystems that comes from the loss or transformation of places intrinsic to their history and culture—national culture, tribal culture, ethnic group culture, local community culture, neighborhood culture, interest group culture, or sexual orientation culture. It’s about respecting people’s attachment to place.</p> <p>That’s the unfulfilled potential of the NHPA—to create and maintain a system by which people and communities can work effectively to maintain their intangible, emotionally freighted cultural heritage and by which government can be made to respect that heritage.</p> <p>People and communities want to preserve environments that they care about, and it’s those people and communities that historic preservation should serve.</p> <p>(part of 50th Anniversary Celebration)</p>
33.	2017	The National Park Service LGBTQ Heritage Initiative: One Year Out (Megan E. Springate)	The George Wright Forum	Overview and reflection		<p>This document provides a broad context for identifying, evaluating, and preserving places important to LGBTQ history across the United States. Its release was a milestone for the National Park Service (NPS) LGBTQ heritage initiative that began in earnest in 2014 with the donation of \$250,000 from the Gill Foundation (an LGBTQ non-profit) to the National Park Foundation (NPF), which is the official friends group and fundraiser for the NPS. This was the first time ever that a federal government agency has looked at LGBTQ history at a national level (the Pride of Place project in the UK began shortly after the NPS initiative). In this paper, written one year after the release of LGBTQ America, I reflect both on the process and the impact of the work, and try my hand at telling the future, looking at its influence into 2018 and beyond.</p>

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						“I see continued use of the theme study as a jumping-off point to writing community histories tied to specific places; to nominating increasing numbers of places to the National Register and the NHL program, as well as to local and state historic marker programs; and to further incorporating LGBTQ history into American history, where it belongs”
34.	2017	The Historic Preservation Fund: Expanding on the Foundation We’ve Built Together (Congressmen Earl Blumenauer and Mike Turner)	NTHP Forum Journal Fall 2016/Winter 2017	Article commemorate the 50 th Anniversary of the NHPA. Journal chapter		HPP is woefully underfunded despite a grouping field and need (part of 50 th Anniversary Celebration)
35.	2017	Continuous Existence of Historic Ship Museums (Philip R. Byrd)	Public Historian	Journal article		<p>Keeping museum practices strictly within the confines of the National Register of Historic Places’ period of historical significance guidelines is not sustainable for many museum ships. By defining and using continuous existence, SS John W. Brown is creating a new method of interpretation, marketing, preservation, and programming that tells a larger story. This paper puts SS John W. Brown, a Liberty ship from World War II, operational vessel, and maritime museum, into context by surveying ships on the National Register of Historic Places. As World War II fades from public memory and popular culture, a new methodology is required.</p> <p>How to tell the whole story of a property that extends well beyond the 50 year mark. The problem with a fixed period of significance. Should be a starting point for interpretation. I propose a longer, broader, and more dynamic understanding of the period of significance that incorporates continuous existence.</p> <p>Under this model, updates to the ship are both appropriate and necessary, as is the ability to interpret the continuous use of the vessel via programming, exhibition, and collections. To ensure that historic ship museums both stay afloat and remain culturally relevant, they must have</p>

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						the flexibility to incorporate dynamic and experiential learning into a broader interpretation of why they are significant.
36.	2016	“White People Like Hiking” (Laura Burd Schiavo)	Public Historian			<p>For the past few decades there have been repeated calls from within and without the National Park Service for more inclusive interpretation in the park system. Concurrently there has been great concern about the lack of diversity among visitors to Park Service units. The 2009 Comprehensive Survey of the American Public, repeatedly cited in the popular press, reported that recent visitors to a Park Service unit were “disproportionately” “white, non-Hispanic.” This paper looks to problematize this survey and its conclusions that concern for the environment is predominantly white, that attendance at NPS sites is tantamount to national belonging, and that future support for NPS is threatened as the United States becomes majority nonwhite. The paper also looks to question the link between the racial and ethnic identity of visitors and “relevant” interpretation.</p> <p>Not directly related to the NR but relevant</p>
37.	2016	Race and Historic Preservation The Case for Mainstreaming Asian American and Pacific Islander American Historic Sites (Franklin Odo)	Bending the Future			<p>Many possible sites could raise critical questions, such as “How did our current immigration policies emerge and evolve?” and “What does the historical record say about our nation’s ability to adhere to constitutional principles in, say, the Bill of Rights, when questions of national security become preeminent?” Preservation should help consider how well organized labor has managed issues of diversity when faced with threats to jobs, and how the nation has changed its definition of who is fit to be or become an American. Importantly, such efforts should be designed to ask “What should be the roles of diasporic immigrant or refugee groups in the U.S. with regard to American foreign policies directed at their former homelands—and will these patterns change as these communities become increasingly African, Middle Eastern, Muslim, Latino, Asian, and Pacific Islander?” Or “How does the history of AAPIs in educational systems inform our understanding of segregation or quotas or caps and affirmative action?”</p>

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38.	2016	The Truth about the National Register of Historic Places	Heritage Works blog	??		One of the most misunderstood areas of historic preservation is the National Register of Historic Places (the “National Register”). People do not know what the National Register is, they do not know how or why a building or site gets listed on the National Register and they certainly do not know the ramifications of a listing on the National Register. In far too many instances, misconceptions about the National Register needlessly impede or delay the rehabilitation of historic buildings.
39.	2016	To Expand and Maintain a National Register of Historic Places (John H. Sprinkle)	Bending the Future	chapter		After all of the inspirational language found in the preamble to the National Historic Preservation Act, the very first activity delegated to the Secretary of the Interior in 1966 was “to expand and maintain a National Register of Historic Places.” In the last fifty years, half of that goal has been achieved. The other half needs work. Given where it started in the mid-1960s, the national preservation partnership has done an impressive job expanding the scope of the National Register. The criteria first published in 1969 were primarily based on a thirty-year track record of administrative review and historical evaluation by a National Park Service program whose mandate was to deter, deflect, and discourage the acquisition of new parks proposed for addition to a system already burdened with maintenance backlog issues. But the goal of the “new preservation” of the 1960s was never to acquire and interpret a comprehensive panorama of the American experience; its mission was to ensure that due consideration was given to historic places in managing the change that was to come in the last decades of the twentieth century. Expansion of the register did represent the liberalization of preexisting recognition criteria. Frank Lloyd Wright’s widely regarded residential masterpiece, the Robie House, was designated as a National Historic Landmark in 1963, but only after a five-year review period. The Park Service adopted “historic districts” as a property type only in 1965. Traditional resistance to the recognition of living persons, manifested in the little-remembered “twenty-five-year rule” that restricted historical evaluation until a generation after a person’s death, was not adopted by the new preservation

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40.	2016	*Bending the Future: Fifty Ideas for the Next Fifty Years of Historic Preservation (Max Page and Marla R. Miller, eds)	UMass Press	book	Underrepresented Communities	Challenges ranging from preservation ordinances to gentrification to social justice and the need for more diversity (in terms of properties and practitioners) Review found noticeable weaknesses, inconsistencies, and errors, but nevertheless timely, provocative, and important.
41.	2016	The Casita Rincon Criollo and the Designation of Traditional Cultural Places: Tradition and the Ethics of Practice (Michael Ann Williams and Virginia Siegel)	Traditional Dwellings and Settlements Review, Fall 2016, Vol 28, No 1	Journal article	TCPs, Bulletin 38, who defines significance	Explores TCPs, most of which are related to Native Americans, no standard definition of traditional, TCPs should be defined by whoever is trying to define it, NPS stumbles to revise Bulletin 38
42.	2016	Culture as the Catalyst: Broadening Our History, Intangible Heritage, and Enlivening Historic Places (Julianne Polanco); chapter in Bending the Future	UMass Press	Book chapter	Intangible heritage, practitioner perspective (CA SHPO), present history, removing barriers	<p>History is present in place – “we are compelled not only to expand the stories that are told but to do so in a way that honors each layer of a place and includes its current inhabitants”</p> <p>Maravilla Handball Court (1928) and El Centro Grocery (1946) in East LA – lack integrity but have strongly testified community significance</p> <p>Increase use of documentation tools (e.g. context statements, MPDs) help remove integrity and financial barriers because they lay the framework for more easily getting a thematic-related place listed</p> <p>UNESCO created “intangible cultural heritage” list that includes cultural attributes such as tapas, mariachi, and flamenco</p> <p>Culture is a “catalyst for knowledge, empowerment, and peace.”</p>
43.	2016	Peopling Preservation: A Forum in Honor of the Fiftieth Anniversary of the	Buildings & Landscapes: The Journal of the Vernacular	Journal article		Like the buildings we study, the National Historic Preservation Act was a product of its time. With that in mind, this issue includes not just this Preservation Forum but also a series of articles and research notes providing context for the passage of the NHPA. From rural electrification to interstate highways to urban renewal programs, much of the twentieth

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		NHPA of 1966 (Cynthia G. Falk and Anna Vemer Andrzejewski)	Architecture Forum, Vol 23, No 2 Fall 2016 pp1-5			century was marked by a quest for the new and improved, with an emphasis on better, faster, and brighter. The NHPA arose as an antidote to those trends. Fifty years later, we can celebrate its accomplishments, criticize its shortcomings, and question how the future of historic preservation can better respond to the needs of an increasingly diverse American populace, interested in the past but still being propelled toward the future.
44.	2016	Steps toward Decolonizing the National Historic Preservation Act (Dongoske and Pasqual)	In Bending the Future	Book chapter	Decolonization	Sec 106 and making more Native properties eligible for inclusion under Criteria A and B. Understanding perspective in shaping historic context and what makes something significance. Inherent biases in language. Definitions, and criteria that favor built environments. Increase the use of indigenous terminology when appropriate to convey values, relationships, significance, and complex systems that are not easily understood or conveyed in English.
45. KR	2016	Introduction: National Parks and National Character (John H. Sprinkle Jr)	Public Historian	Book intro		8 Perhaps in the same way, it might serve the National Park Service to be less nostalgic and become more realistic about the course of its own history. In so many ways it is time to change the tone of our parks and programs and to be more specific about the distinctive and useful role they play in shaping our national character.
46.	2015	Reimagining Freedom in the Twenty-first Century at a Post- Emancipation Site Jennifer Scott)	The Public Historian	Journal article		How can a historic house museum speak to communities experiencing complex urban change and social ills in the twenty-first century? Weeksville Heritage Center (WHC), a post-emancipation site based in residential Brooklyn, interprets a free black, intentional, land-owning community, which established its own schools, churches, and anti-slavery organizations, and operated as a safe space for African Americans in the greater New York area throughout the nineteenth century. The museum is a direct result of more than a generation of community activism begun in the late 1960s to reclaim a forgotten history. WHC radically attempts to redefine ideas of freedom and emancipation in contemporary and self-determined ways. Drawing on Weeksville’s histories, WHC explores interpretations that highlight agency, independence, and activism and that resonate with contemporary concerns.

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						Not specifically about NR but speaks to underlying trend
47.	2015	What Can and Can't Be Said: Race, Uplift, and Monument Building in the Contemporary South (Dell Upton)	Yale University Press	Book	Not necessarily a critique of the NR, but complex dialogue on preservation and NR recognition of monuments	<p>An original study of monuments to the civil rights movement and Black history that have been erected in the American South over the past three decades, this powerful work explores how commemorative structures have been used to assert the presence of African Americans in contemporary Southern society while showing how the construction of such monuments frequently exposes the myth that racial differences have been overcome.</p> <p>Examining monuments whose creation has been particularly contentious, from the Martin Luther King, Jr., National Memorial in Washington, D.C., to more obscure memorials such as the so-called "multicultural monument" in Bowling Green, Virginia, Dell Upton shows that monument builders must contend not only with varied interpretations of the African-American past but also with the continuing presence of White supremacy--not only in its traditional forms but also in the subtler, more recent assumptions that Whites are neutral arbiters of what is fair and accurate in such monuments.</p> <p>Upton argues that Southerners, White and Black, share a convenient fiction--a "dual heritage" that allows them to acknowledge the Black past without relinquishing cherished White historical mythologies. In his conclusion, Upton considers how these two pasts might be reimagined and memorialized as a single Southern American history.</p>
48.	2014	Fifty Years of the National Historic Preservation Act (James Glass)	History News	Magazine article		Historic narrative discussing the history of the NHPA from Kennedy to present showing the funding shortfalls since 1982.
49.	2014	*Crafting Preservation Criteria: The National Register of Historic Places and American Historic Preservation (John Sprinkle, Jr, ed)	Routledge	book	Cultural and social bias, NR origins, original intent, comprehensive survey, integrity and authenticity, archaeological sites,	History of the NR (first chapter – includes foundation upon which NR was built), NPS had to develop a way to understand how many significant places existed in the country and how the comprehensive survey mechanism may have been a function of efficiency and planning, not necessarily what's actually significant and to whom. Discusses elusive qualities of integrity and authenticity, problems inherent in identifying

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					relocated properties, architectural vs historical significance, “eligible for inclusion”, Section 106 / NHPA	<p>archaeological sites, relocated properties, architectural vs historical significance, etc. cultural and social bias</p> <p>Explores origins of the phrase “eligible for inclusion” in a regulatory context</p> <p>Does not address cultural conservation, traditional cultural properties</p>
50.	2014	Is the National Register of Historic Places Helping or Hindering Legacy City Preservation? (Michael R. Allen)	NTHP Forum	Forum article		<p>Uses case studies in neighborhoods struck by urban renewal such as JeffVanderLou in St. Louis to argue that there is enough “there there” in these neighborhoods but that district nominations are not possible given the amount of voids left by urban renewal from the 60s and 70s when a lot of then-historic properties were demolished. Speaks to the irony that NR was intended to save such demolitions from occurring in the first place as a knee-jerk reaction to urban renewal, but now cannot be preserved because of the precise reason they should have been preserved in the first place.</p> <p>Struggling and currently marginalized communities are thus left without financial incentives and economic drivers such as Federal Historic Tax Credits because they cannot get their district listed as they rebuild from the earlier decades’ ill-fated anti-preservation demolitions.</p> <p>“Fractured neighborhoods don’t stand a chance of becoming historic districts, no matter how hard communities push. The National Register privileges appearance over community will, public commemoration and economic value.”</p>
51.	2014	Values-Based Preservation, Civic Engagement, and the U.S. National Park Service (Barbara J. Little)	The Journal of Preservation Technology	article		<p>This article includes a discussion of how some of the tenets and application of values-based management apply to national-heritage practice generally; reflections on the Getty Conservation Institute report on Chaco Culture National Historical Park as one of the institute's four case studies assessing values-based management; and considerations of some current tools and policies supportive of values-based heritage management.</p>

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52.	2013	A Historical Archaeology of Labor and Social Justice (Paul A. Shackel)	American Anthropologist			<p>One of the most powerful tools we have to address inequalities is designating site of labor struggle to the National Register of Historic Places.</p> <p>If you can change the memory of an event, you change what is important in the public memory.</p> <p>Battlefields and class warfare</p> <p>Forced delisting?</p>
53.	2013	*The Conservation Movement: A History of Architectural Preservation, Antiquity to Modernity (Miles Glendinning)	Routledge	book	what should be conserved	<p>Miles Glendinning’s new book authoritatively presents, for the first time, the entire history of this architectural Conservation Movement, and traces its dramatic fluctuations in ideas and popularity, ending by questioning whether its recent international ascendancy can last indefinitely.</p> <p>In many cities across the world, particularly in Europe, old buildings form a prominent part of the built environment, and we often take it for granted that their contribution is intrinsically positive. How has that widely-shared belief come about, and is its continued general acceptance inevitable?</p> <p>Certainly, ancient structures have long been treated with care and reverence in many societies, including classical Rome and Greece. But only in modern Europe and America, in the last two centuries, has this care been elaborated and energised into a forceful, dynamic ideology: a ‘Conservation Movement’, infused with a sense of historical destiny and loss, that paradoxically shared many of the characteristics of Enlightenment modernity. The close inter-relationship between conservation and modern civilisation was most dramatically heightened in periods of war or social upheaval, beginning with the French Revolution, and rising to a tragic climax in the 20th-century age of totalitarian extremism; more recently the troubled relationship of ‘heritage’ and global commercialism has become dominant.</p>

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54.	2012	Beyond a Boundary: Washington's Historic Districts and Their Racial Contents (Cameron Logan)	Urban History Review University of Toronto Press	Article	<p>Who decides what is historically significant in the urban environment?</p> <p>The story of what happened around Dupont Circle reveals that the capacity and entitlement to say that a place is historically significant, and thereby protect it, is a form of social power.</p> <p>Between the mid-1970s and the mid-1980s there was a wave of citizen-initiated preservation activity in Washington, DC, much of it directed towards identifying and expanding neighborhood historic districts. These efforts were driven by several different events and influences that coalesced in the period: a new sense of local control that came with the establishment of municipal self-government in the District of Columbia after 1970s; the expectation that a comprehensive historic preservation law would be enacted in the district ; the U.S. Supreme Court's affirmation of the legality of preservation controls in 1978 ; and the renewed salience of the idea of place that affected everything from community art and neighborhood activism to urban design and architectural theory. This paper addresses this moment of intense activity by investigating the ways in which preservation advocates in one neighborhood, Dupont Circle, sought to expand their historic district. The proposal to add several square miles of new territory to the designated historic area was led by a predominantly white preservation organization, the Dupont Circle Conservancy. The proposal aroused significant opposition from a group calling itself the 14th and U Street Coalition, which styled itself as the representative of African-American interests and historical identity in neighboring Shaw. They protested that the Dupont Circle preservationists were attempting to annex their neighborhood and with it, their history. At first glance this conflict appears to be a predictable case of inner-city gentrification fought along the lines of racial identity. But when examined more carefully, the series of claims and counterclaims embedded in the conflict exposed a more nuanced set of issues related to skin tone, class, and historical entitlement. The conflict highlighted the absence of any</p>

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						agreement about what constituted the historicity of such a historic area and cast doubt over who might be qualified speak on behalf of the history contained in such an area.
55.	2012	Signs of the Times: The Montana Historical Society's National Register Sign Program (Ellen Baumler)	Montana The Magazine of Western History	Journal Article		Montana’s sign program brings the colorful stories of both urban and rural places to the public. It is one way the Montana Historical Society serves Montana citizens and communities and actively contributes to the preservation of local history. Montana’s sign program offers state-subsidized markers that tell the property’s history
56.	2012	*Museums, Monuments, and National Parks: Toward a New Genealogy of Public History (Denise D. Meringolo)	UMass Press	Book	public history and current tensions among NPS administrator, practitioners and public historians	The rapid expansion of the field of public history since the 1970s has led many to believe that it is a relatively new profession. In this book, Denise D. Meringolo shows that the roots of public history actually reach back to the nineteenth century, when the federal government entered into the work of collecting and preserving the nation's natural and cultural resources. Scientists conducting research and gathering specimens became key figures in a broader effort to protect and interpret the nation's landscape. Their collaboration with entrepreneurs, academics, curators, and bureaucrats alike helped pave the way for other governmental initiatives, from the Smithsonian Institution to the parks and monuments today managed by the National Park Service. All of these developments included interpretive activities that shaped public understanding of the past. Yet it was not until the emergence of the education-oriented National Park Service history program in the 1920s and 1930s that public history found an institutional home that grounded professional practice simultaneously in the values of the emerging discipline and in government service. Even thereafter, tensions between administrators in Washington and practitioners on the ground at National Parks, monuments, and museums continued to define and redefine the scope and substance of the field. The process of definition persists to this day, according to Meringolo, as public

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						historians establish a growing presence in major universities throughout the United States and abroad.
57.	2011	Imperiled Promise: The State of History in the National Park Service	Organization of American Historians	NPS Invitational Publication		Publication created by Organization of American Historians at the invitation of and under a Cooperative Agreement with the National Park Service. Several gaps were identified with the NPS interpretation of history including sporadic resourcing, singular and unchanging interpretations, and focus on compliance.
58.	2010	Where is the History in Historic Districts— Some Concluding Thoughts (Patrick W. O'Bannon)	Public Historian			Abstract: This paper offers concluding statements on the papers presented as part of the working group “Where is the History in Historic Districts,” presented at the 2009 NCPH Annual Conference in Providence, Rhode Island. The working group addressed important questions regarding whose history is presented in historic districts and whether architecture is privileged over history in the delineation and designation of districts. Districts are bureaucratic constructs. They must preserve tangible, physical remainders of the past, but the history that those artifacts present may be as restrictive or as inclusive as promoters, government officials, residents, and public historians choose.
59.	2010	*50 Years Reconsidered (Elaine B. Stiles)	Forum Journal			Who decides where the past ends and present begins. Preservation is a movement rooted in time, and the reasons why society seeks to preserve past aspects of the built or designed environment stem from an underlying belief that what is old is valuable and meaningful to modern society. Unfortunately, many preservationists see the 50-year cut-off not only as a necessary period of distance for reliable evaluation but also as a philosophical line separating quality from inferiority. The concept of “old” being valuable and meaningful can easily transform into a less-defendable value judgment that what is old is inherently better than what is new.
60.	2010	History, Memory, and Historic Districts in	Public Historian	Journal article		Across America, National Register Historic Districts have done a better job helping to preserve building stock and stabilize communities than they have of meeting the articulated goal of With a Heritage So Rich, the

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		Chicago (Theodore J. Karamanski)				foundational 1966 study that gave birth to the National Register of Historic Places. According to that report, historic sites were to “give a sense of orientation to our society” and help to implant in people “values of time and place.” This article looks at the evolution of historic districts in Chicago, Illinois through the lens of public memory. It explores the relationship between “official” memory and gentrification, “vernacular memory” and community preservation through the story of two waves of National Register District creation in Chicago, first in the 1980s led by real estate developers and a second in the late 1990s. Democratizing the National Register.
61.	2010	Beyond the Boom/Bust Cycle (Lea S. Glaser)	Western Historical Quarterly	Journal Article		Exploration on the challenges and opportunities of preserving, documenting, managing, and interpreting historic resources associated with the boom/bust cycles of the West—Dyea, Alaska as example. Including multiple stories under the rubric of cultural landscape. <i>New Western History</i>
62.	2009	"History Is as History Was, and Cannot Be Changed": Origins of the National Register Criteria Consideration for Religious Properties (John H. Sprinkle Jr.)	Buildings & Landscapes: Journal of the Vernacular Architecture Forum	Journal article		Old Bohemia Church, separation of Church and State, challenge of recognizing the history of religious properties and the foundations of religious consideration A.
63.	2009	Our Unprotected Heritage: Whitewashing the Destruction of Our Cultural and Natural Environment (Thomas F. King)	Left Coast Press	Book		Most Americans agree that our heritage—both natural and cultural—should be protected. Then why does development run rampant, aided—rather than limited—by government inaction? Tom King has been a participant in and observer of this system for decades, as a government worker, heritage consultant, and advocate for local communities. In this hard-hitting critique of the heritage-industrial complex, King points the finger at watchdogs who instead serve as advocates, unintelligible (often contradictory) regulations, disinterested government employees and power-seeking agencies, all of whom conspire to keep our heritage

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						unprotected. His solution to this crisis will be uncomfortable to many in power, but may help save more of our cultural and natural treasures.
64.	2007	The Preserve America Summit: Charting a Future Course for the National Historic Preservation Program – Findings and Recommendations of the Advisory Council on Historic Preservation	Advisory Council on Historic Preservation	Publication		In August of 2007 the ACHP convened the Preserve America Summit to examine many aspects of the national historic preservation program in conjunction with the 40 th Anniversary of the National Historic Preservation Act. Many of the recommendations focused upon improving accessibility of the program, promoting cultural diversity and inclusiveness.
65.	2007	The Aesthetics of Equity: Notes on Race, Space, Architecture, and Music (Craig L. Wilkins)	University of Minnesota Press	Book	Not a critique of NR	<p>Not a critique of the NR, but directly related criticism of the field of architecture in general and its exclusionary issues. Blindly preserving “architecture” when it’s been pointed out as exclusionary purports the systemic racism inherent in the field.</p> <p>Architecture is often thought to be a diary of a society, filled with symbolic representations of specific cultural moments. However, as Craig L. Wilkins observes, that diary includes far too few narratives of the diverse cultures in U.S. society. Wilkins states that the discipline of architecture has a resistance to African Americans at every level, from the startlingly small number of architecture students to the paltry number of registered architects in the United States today.</p> <p>Working to understand how ideologies are formed, transmitted, and embedded in the built environment, Wilkins deconstructs how the marginalization of African Americans is authorized within the field of architecture. He then outlines how activist forms of expression shape and sustain communities, fashioning an architectural theory around the site of environmental conflict constructed by hip-hop culture.</p> <p>Wilkins places his concerns in a historical context, and also offers practical solutions to address them. In doing so, he reveals new possibilities for an</p>

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						architecture that acknowledges its current shortcomings and replies to the needs of multicultural constituencies.
66.	2007	“Of Exceptional Importance”: The Origins of the “Fifty-Year Rule” in Historic Preservation (John H. Sprinkle Jr.)	The Public Historian, Vol. 29, No. 2 (Spring 2007), pp. 81-103	Journal article	50 year rule	The “fifty-year rule” is one of the most commonly accepted principles within American historic preservation: properties that have achieved significance within the past fifty years are generally not considered eligible for listing in the National Register of Historic places. An often misunderstood chronological threshold, the fifty-year standard was established by National Park Service historians in 1948. Until the advent of the “new preservation” with the National Historic Preservation Act in 1966, the standard of exceptional importance had only been applied to presidential and atomic heritage sites. Operating as a filter to ward off potentially controversial decisions about the nature of historic site significance, understanding the origins of the fifty-year rule reveals how Americans have constructed the chronological boundaries of a useable past through historic preservation during the twentieth century
67.	2006	Finding a Place for the Commonplace: Hurricane Katrina, Communities, and Preservation Law (David W. Morgan, Nancy I. M. Morgan and Brenda Barrett)	American Anthropologist	Journal article		The aftermath of Hurricane Katrina drew attention to commonplace landscape markers that create for a community a sense of place—that connection between people and places crucial to a sense of corporate and individual identity and heritage. There is a legal context for sense of place within extant federal preservation legislation. Nevertheless, many such markers with special meanings for residents have been overlooked in federal documentation, the cornerstone of which is the National Register of Historic Places. Grassroots efforts and national media coverage have helped forge a niche for sense of place within the recovery plans and policy emerging in the affected region. However, it is unclear whether this will carry over into practice. In terms of long-term policy shifts, remedying the shortcomings highlighted by Katrina may require changes to the National Historic Preservation Act and its associated guidelines and regulations, or it may entail a new approach altogether.
68.	2006	When Nature Becomes Culture: The National Register and	western Historical Quarterly ,	Journal article		For environmental advocates cultural analysis of natural sites opens the door to a universe of historic preservation laws originally designed to protect cultural resources. These can be used, as in the case of Camp 4, to

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		Yosemite's Camp 4, a Case Study (Andrew Kirk and Charles Palmer)				protect significant areas that fail to meet the standards required for preservation purely on the basis of natural qualities.
69.	2005	Native American Sacred Places and the Language of Capitalism by Adam Fish	Future Anterior: Journal of Historic Preservation , History, Theory, and Criticism	Journal article		How might attention to names and naming, powerful acts of assumption and ascription alike, provide one point of entry into the complexity of representing the pasts of indigenous peoples of North America and other regions of the world as native societies engaged with the Western imperial world?1 To answer this question, one must begin by analyzing how the National Parks Service names Traditional Cultural Properties (TCPs), specifically, Native American sacred places. There is, as I will demonstrate, a correlation between the institutional definition of TCPs and the language of American capitalism. The act of naming sacred lands as "property" or as "cultural resources" compromises the religious rights of a minority for the economic benefit of the majority. The language of capitalism influences the representation of and access to the material past.
70.	2004	*Giving Preservation a History: Histories of Historic Preservation in the United States (Max Page and Randall Mason, eds)	Routledge	book	history of preservation and what has made it evolve	In this volume, some of the leading figures in the field have been brought together to write on the roots of the historic preservation movement in the United States, ranging from New York to Santa Fe, Charleston to Chicago. Giving Preservation a History explores the long history of historic preservation: how preservation movements have taken a leading role in shaping American urban space and development; how historic preservation battles have reflected broader social forces; and what the changing nature of historic preservation means for efforts to preserve national, urban, and local heritage. The second edition adds several new essays addressing key developing areas in the field by major new voices. The new essays represent the broadening range of scholarship on historic preservation generated since the publication of the first edition, taking better account of the role of cultural diversity and difference within the field while exploring the connections between

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						preservation and allied concerns such as environmental sustainability, LGBTQ and nonwhite identity, and economic development.
71.	2004	Historic Places and the Diversity Deficit in Heritage Conservation (Ned Kaufman)	The Journal of Heritage Stewardship	Journal article		Set of Solutions How should historic preservation present racially, ethnically, and culturally diverse historical experiences? The Centrality of History and Places of Experience
72.	2003	Liberal or Cultural: A Comment (Brian D. Haley)	American Anthropologist	Journal article		Comments regarding TCPs reflect the Postmodernism movement in cultural anthropology.
73.	2002	The Underground Railroad and the National Register of Historic Places: Historical Importance vs. Architectural Integrity (Judith Wellman)	The Public Historian	Journal article		How to document historical significant events that do not retain architectural integrity. Makes the argument that well documented sites should be considered for NR listing even when the integrity is compromised.
74.	2002	The Underground Railroad: Refining Eligibility Criteria (Carol D. Shull)	The Public Historian	NPS response to article	Lost integrity, NPS response, practitioner	As Keeper of the National Register, however, I disagree with the dichotomy suggested in the subtitle of Professor Wellman’s article: “Historical Importance vs. Architectural Integrity?” Eligibility for listing in the National Register requires both historical importance, or significance, and physical integrity; the nearly 75,000 listings in the National Register testify to the fact that these qualities can, and do, coexist. Integrity does not require that historic places be “unchanged,” as Professor Wellman suggests, however. Almost all of the places listed in the National Register, including those designated as National Historic Landmarks because of their association with the Underground Railroad and those other listed properties included in the National Register’s Underground Railroad Travel Itinerary, have been altered to some degree or show evidence of deterioration.

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						<p>A place that has lost its ability to testify to its historical significance should not be preserved: “Why should we use listing in the National Register to protect such places against destructive change, when that change has already occurred?” - Shull</p> <p><i>“It is important to remember that the National Register was established as part of a program to preserve historic places, not simply to commemorate them.” - Shull</i></p>
75.	2001	*When Hist When History Is History Is History: Maxwell Street, “Integrity,” and the Failure of Historic Preservation Law (Mark D. Brookstein)				<p>While preservation clearly implicates local concerns, there is a countervailing federal interest in protecting against unbridled discretion on the local level. These competing interests must be balanced so as to not give short shrift to the national interest in preservation. History v Development</p>
76.	2001	Preservation as Perpetuation (Marcia Pablo)	American Indian Quarterly	Journal article		<p>The theme of this session, Native Spaces-Public Places, is at the center of the issue of preservation and is at the heart of the challenge to First Nations to protect and perpetuate their cultural survival. As you know, the First Nations of this continent did not have a written history in book form, as did the non- Indian peoples who came here. Our history is written within our unique and specific cultural landscapes. These places hold the memories of our ancestors, speak to us in the present, and are crucial to our survival, as Indian people, into the future.</p>
77.	2000	Sacred Objects and Sacred Places: Preserving Tribal Traditions (Andrew Gulliford)	University of Colorado Press	Book		<p><i>Sacred Objects, Sacred Places</i> combines native oral histories, photographs, drawings, and case studies to present current issues of cultural preservation vital to American Indians, Alaska Natives, and Native Hawaiians. Complete with commentaries by native peoples, non-native curators, and archaeologists, this book discusses the repatriation of human remains, the curation and exhibition of sacred masks and medicine bundles, and key cultural compromises for preservation successes in protecting sacred places on private, state, and federal lands.</p> <p>The author traveled thousands of miles over a ten-year period to meet and interview tribal elders, visit sacred places, and discuss the power of</p>

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						<p>sacred objects in order to present the essential debates surrounding tribal historic preservation. Without revealing the exact locations of sacred places (unless tribes have gone public with their cultural concerns), Gulliford discusses the cultural significance of tribal sacred sites and the ways in which they are being preserved. Some of the case studies included are the Wyoming Medicine Wheel, Devil's Tower National Monument, Mount Shasta in California, Mount Graham in Arizona, and the Sweet Grass Hills in Montana. Federal laws are reviewed in the context of tribal preservation programs, and tribal elders discuss specific cases of repatriation.</p> <p>Though the book describes numerous tribal tragedies and offers examples of cultural theft, <i>Sacred Objects and Sacred Places</i> affirms living traditions. It reveals how the resolution of these controversies in favor of native people will ensure their cultural continuity in a changing and increasingly complex world. The issues of returning human remains, curating sacred objects, and preserving tribal traditions are addressed to provide the reader with a full picture of Native Americans' struggles to keep their heritage alive.</p>
78.	1999	Academics in Tennis Shoes: Historic Preservation and the Academy (Daniel Bluestone)	Journal of the Society of Architectural Historians	Journal article		Paper looks at how the professionalization of historic preservation marginalized and pushed out women who were the first to recognize the value of historic properties.
79.	1997	Supporting Working Women: YWCA Buildings in the National Register of Historic Places (Antoinette J. Lee)	OAH Magazine of History	Magazine article		Understanding the YWCA movement in the US can be enhanced through the examination of NR nomination of related institution.
80.	1997	Keeping Women in Their Historic Places: Bringing Women's Stories to the	OAH Magazine of History	Magazine article		Historic places connect us to, and teach us about, the past. They have interesting and important stories to impart, which they convey with an often surprising immediacy and power. The power of these places can be brought into the classroom. Many educators have echoed the words of John Patrick, professor of education at Indiana University, who said that

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		Classroom (Beth Boland)				historic places "can be used by teachers and students as objects of inquiry, in the same way that written primary sources are used in the classrooms of good history teachers" (1). Using properties listed in the National Register of Historic Places, the Teaching with Historic Places program has created instructional materials that reflect the richness, complexity, and diversity of the historic and cultural resources around us. our experience offers some insights into using places to teach women's history.
81.	1997	Archaeology, History, and Material Culture: Grounding Abstractions and Other Imponderables (Barbara J. Little)	International Journal of Historical Archeology	Journal Article		US national programs for hp have a great influence on public memory and commemoration. Decisions about what may be listed in the NRHP or designated a NHL may commemorate or silence parts of the past. Historians invoke the concept of integrity as a gatekeeper to control access to these lists. Archeologists have the opportunity to contest some of the imposed silences and make these list more inclusive of underrepresented groups.
82.	1993	Teaching with Historic Places (Beth M. Boland and Fay Metcalf)	OAH Magazine of History	Magazine article		NPS effort to create themes focused on place for teachers teaching US History.
83.	1991	The National Maritime Initiative: An Interdisciplinary Approach to Maritime Preservation (James P. Delgado)	Public Historian	Journal article	Maritime heritage	ALTHOUGH HISTORIC PRESERVATION efforts date to the last century, a comprehensive, systematic, and professional approach to historic preservation and cultural resource management can be traced to the National Historic Preservation Act of 1966. Since that pioneering legislation, the practice of preservation has grown and, while tempered with occasional failures, setbacks, and problems, has seen marked improvement as well as a general broadening of its scope. One class of cultural resources, however, did not benefit from the mounting support for historic preservation. Although it enjoyed a romantic image, maritime preservation remained for years outside of the preservation mainstream.
84.	1987	The National Register of Historic Places: A Personal Perspective	The Public Historian	Journal article	20 year retrospective of NR	Financial support for the partnership has changed very significantly. The original conceptual underpinning of matching grants to the states and the National Trust from the federal government continues, but on a drastically different scale. After several years of token appropriations, these grants

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		on the First Twenty Years (Jerry L. Rogers)				grew to a high of \$60 million in fiscal year 1979 but have declined to \$24.2 million i In recent years that protection disappeared so rapidly that it seemed almost sudden; many park units are now surrounded by development that ought not to have occurred. This problem, already urgent, will become desperate by the end of the century. In the struggle that is only now beginning, what better allies are there than a state historic preservation officer, a local historic preservation commission and a citizen movement devoted to preserving the nation's historical heritage?
85.	1987	The National Register of Historic Places and Maritime Preservation (James P. Delgado)	APT Bulletin: The Journal of Preservation Technology	Journal article		The National Register of Historic Places can be an important tool for maritime preservation. It is, unfortunately, under- utilized. The National Register nomination process is an important step in the assessment of a vessel's significance and integrity, and it can be an important part of the planning process for the preservation of historic vessels. The National Register is used to define categories and priorities for significance of historic vessels in the United States. Finally, it provides an incentive for maritime preservation through the aiding of funding for National Register-listed preservation project
86.	1987	The National Park Service and Historic Preservation: Historic Preservation beyond Smokey the Bear (Eric Hertfelder)	The Public Historian	Journal article		THE ROLE OF the National Park Service and non-park historic preservation in 1986 is defined by answering two questions. Should the United States maintain its national preservation program as established in the National Historic Preservation Act? If answered in the affirmative, then should the U.S. government pay for its national program The state historic preservation officers (SHPOs), who administer elements of the federal historic preservation program for the Secretary of the Interior, firmly believe the answer to both questions is "yes." The Department of the Interior' has hedged on a direct answer to the first question and has resoundingly said "no" to the second question. This paper examines, from the perspective of the SHPOs, the role of the National Park Service in terms of the national preservation program established by the National Historic Preservation Act of 1966, the national program as it exists (in

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						1987), and alternatives for an improved national preservation program (which includes stable funding, sensible administration, and efficient operation, and general corrections (which include inclusion of clgs, the role of Indians, federal agency preservation responsibilities, and contradictory federal law on archaeology.
87.	1987	Fulfilling its Mandate: The National Park Service and historic Preservation (Jerry L. Rogers)	The Public Historian	Journal Article		In the National Register programs during recent years, we may have concentrated too heavily upon developing the systems through which the programs could run on a highly decentralized basis. Examples include the resource protection planning process, state program evaluation, "spot check" review of National Register nominations, expedited tax act review, and the hierarchy of statute, standards, guidelines, and technical information. We have neglected the "human" touch of continually reinforcing the participatory consensus necessary to make these systems work well. We need to offer many more workshops and other forms of training by which we can share the outstanding strengths and also correct the very real weaknesses that exist in many state programs. Nor have we provided the training to federal agency preservation officers that is so badly needed. Disputes over whether there should be state and national trust grants, and over how Advisory Council on Historic Preservation regulations should be revised have held back progress
88.	1986	The Challenge of Addressing Vernacular Architecture in a State Historic Preservation Survey Program (Barbara Wyatt)	Perspectives in Vernacular Architecture	Journal article		Three issues seem to be of greatest concern to state historic preservation offices, and each one affects the study of vernacular architecture. First: because of evolving standards and poorly trained surveyors, surveys have been conducted unevenly. The sporadic occurrence of vernacular architecture in inventories is especially obvious. Second: in cases where vernacular architecture was surveyed, it was often inadequately described and only superficially evaluated. Furthermore, there was no standard system for identifying types of vernacular buildings. Third: inventory data is often inaccessible because of the sheer bulk of the material and the method by which it is organized. The inaccessibility makes studies of poorly understood building types even more difficult. As SHPOs begin to resolve these situations, their inventories will become more useful to the study of vernacular architecture.

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89.	1986	Historic Preservation That Counts: Quantitative Methods for Evaluating Historic Resources (Stephen D. Mikesell)	The Public Historian	Journal article	Quantifying historic evaluation	The problem is this: current legal and regulatory standards, such as the eligibility criteria for the National Register of Historic Places, are so broad as to be almost useless in evaluating specific properties. The use of ambiguous standards can lead to serious management problems: important historic resources may be lost while preservation money and efforts are directed toward undeserving properties.' One promising solution to this problem involves the use of quantitative evaluation methods in conjunction with comprehensive resource surveys.
90.	1986	The National Historic Preservation Act and The National Park Service: A History	National Park Service Publication	Publication	History of NHPA	A history of the establishment of the National Historic Preservation Act and the National Register of Historic Places within the National Park Service.
91.	1985	Preservation and a Sense of Orientation for American Cities (Robin Elisabeth Dattel)	Geographical Review	Journal article	Historical memory, sense of orientation, sense of belonging	Imperatives for urban historic preservation in the United States are retaining diverse elements of the past, perpetuating distinctive identities of places, involving amateurs in landscape care, and practicing a conservative approach to environmental change. These aspects of the preservation movement were identified by a comprehensive survey of historic districts and preservation organizations in the Philadelphia, Washington, D.C., and San Francisco Bay areas. The preservation movement provides a sense of orientation by accentuating memory and beauty in the ordinary landscape.
92.	1985	Logging, History, and the National Forests: A Case Study of Cultural Resource Management (Theodore J. Karamanski)				History in Historic Preservation (Historians vs Archeologists) Clearly, to take advantage of the growing use of historical methods in preservation, historians need to continue to develop a sensitivity to material culture. Most graduate programs still lack courses which even discuss approaches to three-dimensional historical sources. Sensitivity to material remains is essential if a historian is to function in the multi-disciplinary setting of cultural resource management. But most important of all, we need that which we should have had in the early 1970s when this business began, the consensus of the historical profession that these projects can be valuable, and the active involvement of our national history organization.

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93.	1985	If an Orange Falls in the Forest, is It Eligible? A Comment on Tainter and Lucas (Thomas F. King)	American Antiquity	Comment / opinion		I think that until we replace the Register with a less centralized, more flexible, more sophisticated institution by which to recognize properties worthy of attention in planning, the problems that Tainter and Lucas discuss-both theoretical and mechanical-will persist.
94.	1984	National Register Computerization (Bruce MacDougal)	: Bulletin of the Association for Preservation Technology			What is astonishing to some is not that these records exist, but that there is no automated means for retrieving the great quantity of information they contain. All of the meticulously researched and thoughtfully organized data compiled by thousands of individual researchers across the country over the past 18 years is virtually inaccessible except on a file by file basis. Worse yet, there is not even an automated index of listed properties. In order for a member of the general public to find out what is listed, one needs to paw through pages of newspaper-print-like Federal Register publications. In the Washington, D.C. office of the National Register there is a choice of two indexes, one organized by state, by county, then alphabetically by property name and the other organized alphabetically by name nationally. If you do not know the exact name of the property as it was listed or the county in which the property is located, it may be impossible to find it. This "National Treasure" has gotten to the stage of being a record keepers night-mare and a large untapped source for scholars
95.	1984	The Computerization of Historic Preservation (Barbara Wyatt)	Bulletin of the Association for Preservation Technology	Journal article	Computers, computerization	Historic preservation has traditionally been a field linked more with historic technology than with the progressive technology associated with the computer. Tradition aside, as the preservation field has grown, so has the computer industry. A local or state preservation office of the 1980s, with a substantial staff, a large constituency, and a mammoth site inventory, can hardly ignore the potential implications of computerization. The preservation office that does not seriously consider computerizing is avoiding one of the most exciting aspects of historic preservation today.

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96.	1984	PRESERVING THE COMPLETE HISTORY: Preservationists, folklorists, and social historians combine their research methods to document the architectural and humanistic histories of neighborhoods and sites (SHARON CELSOR)	American Association for State and Local History History News	Journal	Folklorist, social history, historic preservation	Article looks at the contribution folklorist and social historical make in preserving the “commoner’s history’ in the American landscape.
97.	1983	Epistemology of the Significance Concept (Joseph Tainter and G. John Lucas)	America Antiquity	Journal article		"inherent significance" idea makes no sense. Although the concept of significance has been widely discussed in cultural resource management. the origin of the idea and the epistemology underlying it have remained unexamined. This paper outlines the history of the significance concept in historic preservation and traces the current view of significance to the empiricist- positivist school of Western philosophical thought. Flaws in the arguments of this school, and in the logic of the significance concept, are raised and discussed. Potential approaches for dealing with aspects of the significance dilemma are proposed.
98.	1983	On the Importance of the National Register of Historic Places (Steven A. LeBlanc)	American Antiquity	Journal article		The National Register of Historic Places is important to the preservation of prehistoric sites in ways that are not fully appreciated by archaeologists. The advantages of having a site on the Register are discussed. Archaeologists have a responsibility toward site preservation, and the use of the Register is one means to fulfill that responsibility.
99.	1982	Cultural and Environmental Resource	The Public Historian	Journal article		IN CONSIDERING the topic of cultural and environmental resource management as an American Studies-trained architectural historian who now works in a public agency, I have been tempted to join my colleagues

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		Management: The Role of History in Historic Preservation (Elizabeth A. Lyon)				in expressing frustration with prevailing professional attitudes toward historical work outside of an academic setting. The agenda for the Third Annual Conference on Public History and the recent literature on the subject suggest, however, that attitudes within the historical professions are changing. A growing interest in the practice of history both in public agencies and private organizations is evident. Clearly, the professional activity which has been called cultural resource management has played a significant role in these changes.
100.	1982	Cultural and Environmental Resource Management: The Role of History in Historic Preservation (Elizabeth A. Lyon)	The Public Historian	Journal Article	Cultural resource management, public history	American Studies-trained architectural historian who working in a public agency considers the topic of cultural and environmental resource management and frustration with prevailing professional attitudes toward historical work outside of an academic setting. Author cites the agenda for the Third Annual Conference on Public History and the recent literature on the subject and suggests that attitudes within the historical professions are changing. A growing interest in the practice of history both in public agencies and private organizations is evident. He argues that the professional activity called cultural resource management has played a significant role in these change.
101.	1982	American Indian Religious Freedom and Cultural Resources Management: Protecting Mother Earth's Caretakers (Dean B. Suagee)	American Indian Law Review		Establishment clause, religious freedom, American Indian Religious Freedom Act, centrality standard	While the US government has a long history of infringing upon the religious freedom of traditional American Indians, this article looks at how the National Historic Preservation Act of 1966 serves as an opportunity for Native Americans to plan a role in federal decision making process.
102.	1981	Fighting the Preservation Battle (Robert E. Stipe)	Landscape Architecture Magazine, Vol 71, No 4 July 1981	Editorial	Public purpose, public benefit, who defines significance, landscape architecture, tiered	Determinants of significance ultimately results in who gets loans and grants for preservation, and who doesn't. Class I, Class II, Class III of significance – if used, worthiness of preserving anything but Class I might result in losing everything not classified as such

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					classes of significance	
103.	1981	The Historian and Cultural Resource Management (Ronald W. Johnson)	The Public Historian	Journal Article		Despite the growing emphasis on professional resource management, federal and state agencies still employ historians to conduct surveys and to write studies of resources, structures, and furnishings. Herein lies a fundamental difference between the academician employed as a public service historian and the individual pursuing a CRM career, a variation predicated upon the investigation and analysis of history's physical record, not simply on paper documents, photographs, and oral interviews. Thus the built environment and material culture assume a key role in the CRM arena.
104.	1981	Historic Landscape Preservation deserves a broader meaning (Lisa A Kunst and Patricia M. O'Donnell)	Landscape Architecture	Journal article		Conceptual framework and argument for landscape preservation.
105.	1981	*Preservation Comes of Age: From Williamsburg to the National Trust, 1926-1949 (Charles Bridgham Hosmer)	University of Virginia Press	Book	Preservation movement, heritage tourism, capitalism	See 1980 APT article by same author for recap.
106.	1981	The Historian and Cultural Resource Management (Ronald W. Johnson)	The Public Historian	Journal Article	Cultural Resource Management, public history	This paper focuses specifically on history's role in CRM and the introduction of new career opportunities for professional historians with such expertise.
107.	1981	Preservation and Community: New Directions in the Law of Historic	Sandford Law Review	Journal Article	Community-building preservation rationale	The volume of preservationist statutes, grant programs, regulations, and lawsuits since 1966 attests to the major role of federal, state, and local governments in contributing to historic preservation's new stature. However, the author poses the question: Why should our public institutions take an interest in preserving the nation's architectural heritage? The answer, according to the article, is the community-building

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		Preservation (Carol M. Rose)				rationale for preservation, and then using the rationale as a standard for evaluating current preservation programs. The article concludes that historic preservation is important for maintaining the physical environment necessary for an urban community, but it can be even more important in providing procedural vehicles for community organization and activity.
108.	1981	IN MY OPINION: Revising Priorities: Preservation Joins the Establishment (LARRY E. TISE)	American Association for State and Local History History News	Opinion		By 1980, author argues that historic preservation has been a success story and that practitioners should be proud of what had been accomplished since 1966. And although current critics called the National Register program a confusing mess, author argues that the program at the State level is strong and should be allowed to evolve state by state and independent from the federal movement.
109.	1981	Caretakers of the Past: Blacks Preserve Their Architectural Heritage (RICHARD K. DOZIER)	American Association for State and Local History History News			Article highlights the history of African Americans role in saving their historic places while marks the moment when preservationist became aware of the diversity manifest in historic preservation.
110.	1980	Archaeological Significance and the National Register: A Response to Barnes, Briggs and Neilsen (Timothy C. Klinger and L. Mark Raab)	American Antiquity	Position Paper		Response to a disciplinary argument of Criterion D. Klinger and Raab argue that Archeological significance can be supported by any of the four Register criteria. (Personal and angry)
111.	1980	Preservation Comes of Age: From Williamsburg to the National Trust, 1926-1949 (Charles B. Hosmer, Jr)	Bulletin of the APT, 1980, Vol 12, No 3 pp 20-27	Journal article	Preservation movement, heritage tourism, capitalism	Modern preservation movement was borne out of capitalism – started with house museums and battlefield sites and morphed into historic districts, outdoor museums, and preservation planning – all fueled by mobility and transportation enhancements that allowed people to travel. Essentially makes the argument that preservation, as viewed in the early 1980s, only existed as a form of heritage tourism (e.g. Williamsburg, Charleston, and New Orleans)

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112.	1980	Historic Preservation and the Law Today (John M. Fowle)	The Urban Lawyer	Journal Article		Article describes an intellectual shift in Historic Preservation noting that that preservation is concerned with more than sites of historic events or buildings with outstanding architectural quality. Increasing recognition is being given to resources associated with ethnic groups and local traditions. Author concludes that the 'real cutting edge' of historic preservation law is at the local level, calling Historic Preservation a growing and diversifying phenomenon in America today that can also be good for business.
113.	1980	Critical Legal Issues in Historic Preservation (Mendes Hershman, et al.)	The Urban Lawyer	Journal article		Using the Penn Central case as an example, the article argues that the preservation of buildings of historic or aesthetic values and of historic districts is in a very real sense a branch of the law of land use and development, more familiarly embodied in the term zoning. Author notes that there will continue to be serious procedural implications under state and local law by reason of National Register designation. For example, recently, for a client seeking to build an office building, "as of right" under applicable building and zoning laws, procedural delays were encountered because the office building site is adjacent to a building listed on the National Register of Historic Places. Similarly, for another client seeking to develop a vast industrial and office park, we are devising ways and means of avoiding protracted procedural delays occasioned solely because access to the site crosses a waterway listed on the National Register. Author argues that historic preservation will reduce the value of properties.
114.	1979	Georgia's Historic Preservation Office: A Brief History (Elizabeth R. Lyon)	The Georgia Historical Quarterly	Journal article	Historical commission	Through a historical look at the 10-year-old Georgia Historic Preservation program, article highlights the shift in thinking about Cultural Resources in the late 1970s, recognizing that historic preservation means much more than the preservation and interpretation of individual sites of historical or prehistorical association. The article continues to note the expanded focus from individual sites of paramount historical significance to historic districts and cultural landscapes containing many structural types and archaeological resources. It marks the shift from being simply restorationists to conservationists and preservation planners, and that practitioners have changed identities and associations and of necessity have become advocates for historic preservation in many forums.

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115.	1978	Historic Preservation and Environmental Protection: The Role of the Historian (David A. Clary)	The Public Historian	Journal Article	Cultural resource management, historic preservation, historian, interdisciplinary	With in rise of both environmental and public history, the author makes the argument that In refusing to respond to the needs of the real world beyond the specialized circles of their discipline, historians not only acquiesce in the possible deterioration of our national patrimony, but may be writing their own professional epitaph. The present "job crisis" in the profession is due not so much to an absence of need for historians, nor to an overpopulation of them, nor even to the vicissitudes of the economy, as it is to the fact that most historians have been brain- washed into believing that they are fit only to be college professors. It is only the academic field, not the historical one, that is on the wane. Historians will prosper if they can but learn to work elsewhere than on sinking ships. Authors goes on to show historically that traditional historians actually came from public disciplines and serves as the mother of many others, including archeology. Ultimately, author’s call for historians in preservation and working with an interdisciplinary team of cultural resource managers while serving as the consciences of historic preservation, describes the model we have today.
116.	1977	Industrial Archaeology and the Cause for Historic Preservation in the United States (Theodore Anton Sande)	Historical Archaeology	Journal Article	Industrial archaeology, Historic American Building Survey (HABS), Historic American Engineering Record (HAER), Industrial sites	Industrial archaeologists frequently have the benefit of working directly with largely intact structures on relatively undisturbed sites. This contrasts with most archaeologists who deal with material in which fragmentary remains are more common. Historic preservation occupies a special place in the field of industrial archaeology. There is, in fact, both a vested interest and an obligation to preserve surviving industrial sites. The vested interest resides in the desirability of insuring that all important material is recorded, and that can only be achieved if demolition is at least temporarily forestalled. The obligation is to make certain that nationally significant sites in American industrial history are recognized and retained as an essential part of the nation's cultural heritage. This paper reviews pertinent developments in historic preservation and examines the essential qualities of industrial archaeology. Moreover, a useful way in which to classify industrial sites from the point of view of historic preservation is presented.

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117.	1976	Whose Time Is This Place? THE EMERGING SCIENCE OF GARDEN PRESERVATION Author(s): Grady Clay	Landscape Architecture Magazine	Journal Article	Landscape architecture, garden archaeologists	Article concludes that landscape architects and other professionals who confront historic and prehistoric landscapes need both specialized co-workers, and special training for preservation and restoration.
118.	1976	Significance in Archaeology (Michael J. Moratto and Roger E. Kelly)	Kiva			Significance of archaeological materials should be gauged by multiple criteria, especially when the management of the resources requires decisions. Legal, scientific, ethnic, public, monetary, and managerial aspects of significance are all usable standards by which archaeological phenomena should be measured.
119.	1974	NEW INROADS FOR HISTORIC PRESERVATION (Joe A. Shull and Carol D. Shull)	Administrative Law Review	Journal Article	The National Historic Preservation Act of 1966, Ex Order 11593, Advisory Council on Historic Preservation, the Department of Transportation Act of 1966, The National Environmental Policy Act	Since 1966, Congress and the President have shown greater concern for the preservation of historic resources. This new awareness is an outgrowth of our increasingly more widespread interest in the quality of the environment. The National Historic Preservation Act of 1966 (Historic Preservation Act) was the first major legislation, and its stated philosophical justification is evidence of this increased concern: . . . “that 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.”
120.	1973	The Washington Beat: Historic Preservation—Some Practical Problems with The Federal Funding Approach (Tersh Boasberg)	The Urban Lawyer	Journal Article		Marks the social awareness and shift in thinking about Historic preservation, once the province of wealthy matrons and staid historical societies and it fast turn into a major nationwide movement involving architects, businessmen, lawyers, environmentalists and community groups concerned that the values of the past not be forever lost in our precipitate dash toward modernity. Author notes that there is a growing realization that much of our own contemporary identity can best be understood in a context of historical continuity; that preserving the best in our past can greatly enhance the present and provide direction and

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						substance for the future. Article notes the historic preservation movement and its concerns for environmental quality and inner-city involvement. Problem: Funds for historic preservation under both the Open Space Land and the Urban Renewal Programs were abruptly frozen by the administration by direction of then HUD Secretary George Romney on January 8, 1973. ¹¹ Thus, at the time of this writing, no funds are available from HUD for historic preservation purposes.
121.	1973	President's Page: On Making History (Charles E. Cleland)	Historical Archaeology	Speech	Historic archeology	President of the Society of Historical Archeology speaks the sentiment at the time that suggests historic archeologists are "conspirators in a plot to produce an historic heritage which reflects nationalistic purposes" because they interpret objects that are utilitarian rather than art or fine workmanship.
122.	1973	Archeology and National Register (Robert Utley)	Historical Archaeology	Journal Article	Archeology, National Register, Section 106, Grants, Ex Order 11593	Not long ago we could complain indignantly about the short-sightedness of engineers, technicians, and builders who flooded, plowed, and bulldozed archeological sites in the name of progress. That time has passed. New laws have been enacted, and newer ones are being conceived, erecting safeguards for archeological sites and other cultural and environmental values while permitting the builders to go on with their necessary tasks. We have been given legal tools with which to defend our archeological resources. If we do not use them, we share in the responsibility for the continuing loss of these resources. The means of defense must be used with prudence and wisdom. We live in a time when few dare openly to oppose measures for environmental protection. But let us also recognize that our Nation faces a growing shortage of oil, natural gas, and electrical power. Americans demand food, shelter, transportation, and power. However much they need the information that lies waiting in a million archeological sites, they do not demand it. Our defense of these sites must therefore be reasoned and orderly, and it must be conducted in a manner sympathetic to the legitimate and proper interests of those who are now destroying the sites. Peaceful and productive coexistence is possible if we make intelligent use of the tools that have been provided by the Congress and the President. The most important of these tools is the National Register of Historic Places.

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123.	1972	Historic Preservation in the 1970's (Michael J. Smith)	Tennessee Historical Quarterly	Journal Article		Neither Thoreau nor his twentieth-century successors and admirers would expect Concord or Boston of 1970 to look like they did in the 1840's, but it is reasonable to expect some similarity to their appearance in the 1940's. Disappointment in the last thirty years of "progress" is widespread, not only in Massachusetts, but in almost every state, county, and city in America. People everywhere have seen fit to tear down, destroy, and rebuild almost indiscriminately in the name of progress. Highways, reservoirs, suburban sprawl, neon signs, unimaginative box-like structures, and parking lots now cover the homes, farms, villages, and haunts of our ancestors. With the passage of the NHPA of 1966, article looks at how states are responding with new preservation tools.
124.	1971	The Response of Federal Legislation to Historic Preservation (Oscar S. Gray)	Law and Contemporary Problems			Article discusses historic preservation legislation passed since the NHPA of 1966. Included: The Department of Transportation Legislation, Contrasts with the Housing Program, and NEPA of 1969.
125.	1971	The National Register of Historic Places 1969 by United States Department of the Interior, National Park Service (review Joseph A. Baird Jr.)	California Historical Quarterly	Review WOW!		<p>“Why are two ships included in such a register? And why several wildlife refuges? I do not mean to imply that such things are not to be preserved, but if a former salmon canning site and a lumber ship are historic, why not one of the San Francisco Bay ferries or, to push this to ridiculous extremes, an Indian reed canoe.”</p> <p>One cannot crowd all of history into one category.</p>
126.	1970	The National Register of Historic Places 1969 by United States Department of the Interior, National Park Service (Review by: Richard W. E. Perrin)	The Wisconsin Magazine of History	review		<p>“Finally, it is conceivable that America's rich architectural heritage would be accorded greater recognition if the federal government's official clearinghouse for historic preservation, the so-called Advisory Council on Historic Preservation composed of six federal officers of cabinet rank, had an architect on it.”</p>

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127.	1969	PRESIDENT'S PAGE: Do We Have a "Concern"?	Pennsylvania History: A Journal of Mid-Atlantic Studies		Concerned communities	Homer Rosenberger sounds the alarm on the threat of 'progress': The onrush of the bulldozer--almost the dominant sight on the current American scene--daily imperils or destroys historic landmarks in nearly every city and town in the United States. Certainly, not all landmarks can be saved, but those that are to survive should be selected on some reasonable basis by persons with a serious interest in history. His remarks also provide guidance for local communities and concerned individuals to act through the newly created National Register of Historic Places
128.	1967	Legislative History of the National Historic Preservation Act of 1966	NPS	Printed publication	Legislative History	Document describing in detail the history behind the passage of the NHPA from federal government/legislative perspective.
129.	1966	With Heritage So Rich	Random House, Special Committee on Historic Preservation under the auspices of the US Conference of Mayors	Book	Foundational Report	Considered one of the foundational documents leading to the National Historic Preservation Act of 1966.
130.	1965	*Presence of the Past: A History of the Preservation Movement in the United States Before Williamsburg (Charles B. Hosmer Jr)	NTHP	book	Modern preservation movement history	This is a lively, accurate and provocative account of the preservation movement and the dedicated pioneers who saved such historic buildings as Monticello, Mount Vernon, the Lee Mansion, Fort Ticonderoga and many others. Includes well-researched accounts of Ann Pamela Cunningham of South Carolina, William Sumner Appleton of Boston, militant architects Charles F. McKim and Fiske Kimball, the Pell, Levy, and Touro families, the legislature of New York, the City of Philadelphia, the legions of the Sons and Daughters of the American Revolution, and the Native Sons and Daughters of the Golden West

Appendix D: List of Selected Writings Consulted

Affinity resources:

<https://www.design.upenn.edu/historic-preservation/racial-and-social-equity-resources-list> (racial and social equity)

https://www.ianalanpaul.com/wp-content/uploads/2017/08/AllMonumentsMustFall_Syllabus.pdf (monuments)

https://architizer.com/blog/inspiration/industry/anti-racist-design-resources/?utm_source=Architizer&utm_campaign=ddb48e1afe-EMAIL_CAMPAIGN_2018_11_01_01_02_COPY_01&utm_medium=email&utm_term=0_da3caaef3d-ddb48e1afe-27892315 (anti-racism)

<https://bit.ly/spaceraceplace> (space / race, particularly racial construction through form/style/aesthetics/architectural history)

<https://docs.google.com/document/d/1OFhGp1rGM-CHQ|xbEIJTINTPEkt9Y8qW/edit#heading=h.gjdgxs> (anti-racism)

<https://www.sarahmarsom.com/dismantlepreservation> (conference proceedings from Dismantle Preservation)

<https://twistedpreservation.com/2020/06/02/systemic-racism-of-preservation/> (systemic racism in preservation)

Notable inclusive survey projects:

SurveyLA (Hansen and Delgadillo Cruz)

NYC LGBT Historic Sites Project (Dolkart)

East at Main Street (Magalong)

Texas Freedom Colonies Atlas (Roberts)

Notable related books:

The Color of Law: A Forgotten History of How Our Government Segregated America by Richard Rothstein

Root Shock: How Tearing Up City Neighborhoods Hurts America, and What We Can Do About It by Mindy Thompson Fullilove

Race for Profit: How Banks and the Real Estate Industry Undermined Black Homeownership by Keeanga-Yamahtta Taylor

Appendix D: List of Selected Writings Consulted

White Flight: Atlanta and the Making of Modern Conservatism by Kevin Kruse

Appendix E:

Assessing the Problem

As you may have heard, earlier this year, NCSHPO established a new National Historic Designation Advisory Committee. The committee will be reviewing and developing recommendations related to the process for nominating properties to the National Register, the need to make sure that the program adequately reflects the diversity of our nation, whether there are structural impediments to accessing the program, whether other tools are necessary to acknowledge important sites, and countless other variations on those themes. The "best practices" subcommittee is looking into what tools each SHPO utilizes aside from the National Register.

As such, please consider the following questions. We ask for only one response per state, and for responses to be submitted by COB September 17, 2021.

* 1. Please select your State/Territory

2. Full Name of Your Office/Agency

3. What limitations /barriers does your state see in using the National Register and National Register criteria to evaluate and designate historic properties, particularly in diverse communities?

4. What additional limitations / barriers exist to identifying, evaluating, and designating historic properties in diverse communities? (Select all that apply)

- Lack of connections within the community
- Lack of funding for survey
- Owner objections
- Older nominations that don't recognize or include diverse associations
- Listings for built structures that don't include archaeology
- Other (please specify)

5. Is it your observation (anecdotally and/or statistically) that the number of National Register listings related to diverse communities is increasing?

Yes

No

6. What do you think is the biggest driver of increases in listings with diverse associations? (Please rank in order of magnitude, with 1 = highest and 6 = lowest.)

Community (public) demand

Certified Local Government demand

Available NPS funding

SHPO priorities

Increased and intentional outreach

Other

Assessing the Problem

7. Has your state developed contexts to inform National Register nominations in diverse communities?

Yes

No

If so, please give examples

8. Has your state used Multiple Property Designation Forms (MPDFs) to list properties associated with diverse communities or other themes on the National Register?

Yes

No

If so, please elaborate/describe:

9. Has your state listed a Traditional Cultural Property or Cultural Landscape on the National Register?

Yes

No

If so, what was the scale/size? What is the nature of the TCP?

10. What challenges or opportunities did you identify with these tools and designation frameworks? (MPDFs, Contexts, TCPs) Check all that apply.

- Ability to more easily nominate resources outside the criteria/guidance governing significance and integrity
- Ability to list resources more quickly
- Owner objection
- Lack of public familiarity
- Other (please specify)

11. Do you believe the NPS bulletins and guidance are sufficient to aid in listing diverse property types or associations?

- Yes
- No

12. Which NPS bulletins and guidance, if any, are particularly useful? What bulletins could NPS develop or adapt that would be helpful? Should new bulletins be developed?

State Programs

13. Does your state or territory have designation or recognition programs separate from the National Register (state registers, etc)?

Yes

No

State Programs

14. Please explain and provide statutory reference and administrative regulation or rule. If possible, please provide a link to the appropriate statute and/or administrative regulation or rule.

15. Please explain what has worked well to help identify and recognize properties of importance to diverse communities, or what has not worked well, and why.

16. Have those programs been successful in identifying resources from diverse communities?

Yes

No

17. Are those programs focused on identifying resources from diverse communities?

Yes

No

18. Does your designation or recognition program include a regulatory function?

Yes

No

If so, please briefly explain. (e.g., state register compliance)

NPS Programs

19. Has your SHPO used any of the existing NPS grant programs to fund survey, documentation, and National Register listing of properties in diverse communities?

Yes

No

NPS Programs

20. Which program did you use (Under-Represented Communities, African American Civil Rights, etc)?

21. Please share any successful or unsuccessful projects resulting from these grants.

22. What are the challenges or limitations of those programs? What are the positive aspects of those programs?

23. Are there other programs that NPS should consider developing to reach diverse communities and resource types?

Outreach and Engagement

24. Does your SHPO actively engage diverse communities?

Yes

No

Outreach and Engagement

25. What tools, policies, or best practices do you find successful in engaging diverse communities?

26. What types of engagement / partnerships are most fruitful in identifying, supporting, and celebrating heritage broadly (without necessarily relying on NPS processes or standards)?

Other thoughts about what is working or not

27. Please provide any examples of either successful or unsuccessful National Register nominations that challenged the status quo.

28. Are there any other examples of work being done outside the NPS and SHPOs to recognize diverse communities or properties that you think we should be aware of?

29. What types of properties or communities are being left out of our current designation or protection frameworks?

30. Do you have any thoughts about fostering layperson “easy” nominations through the development of an “easy” template (like a 1040EZ in the tax return context)?

31. What is not being done to recognize heritage in communities that needs to be done?

Additional Contact Information

32. Please provide your name (optional)

33. May we contact you if we have questions or are looking for more information?

Yes

No

34. If you answered yes, please provide an email address or phone number.