

Aligned for Success...

Recommendations to Increase the Effectiveness of the Federal Historic Preservation Program



*Preservation Action | Preservation Action Foundation
National Conference of State Historic Preservation Officers
National Trust for Historic Preservation | National Trust Community
Investment Corporation | Historic Tax Credit Coalition
National Alliance of Preservation Commissions
American Cultural Resources Association | Alliance of National
Heritage Areas | US/ICOMOS | Society for Historical Archaeology*



Task Force Partners

Alliance of National Heritage Areas

American Cultural Resources Association

Historic Tax Credit Coalition

National Alliance of Preservation Commissions

National Conference of State Historic Preservation Officers

National Trust for Historic Preservation

National Trust Community Investment Corporation

Preservation Action

Preservation Action Foundation

Society for Historical Archaeology

US National Committee of the International Council on Monuments and Sites

A special project of the Preservation Action Foundation whose mission is to:

- *Facilitate and promote understanding about the federal policies and programs that affect our nation's historic and cultural resources.*
- *Encourage informed and scholarly discourse about preservation policy that lays the groundwork for effective action.*
- *Develop educational programs and resources that will inspire and inform a new generation of preservation advocates.*

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Foreward

In March of 2010, Preservation Action issued a call to those who care about America's historic resources to join together to examine the federal historic preservation program. The stakes could not have been higher, as only weeks earlier the Obama Administration had called for devastating – nearly 40% -- cuts in the program's funding. These cuts were ultimately implemented, with another round of double digit cuts now proposed for 2012.

The cuts bewildered those who know American preservation and its vast potential. Amidst difficult economic times, real estate developers and state historic preservation officers alike had been busy trying to turn loose the explosive job creation potential of historic rehabilitation. From local preservation commission staffs to national heritage area managers, preservationists were hard at work on not only historic documentation and education but rural heritage tourism, energy modeling for older buildings and smart growth among other things. In short, Preservation was and is succeeding at addressing America's most pressing issues.

Why then, did preservation sustain among the deepest budget cuts meted out to any domestic program? That was the core issue at the heart of the Preservation Action call. Answering it was the task taken up by the Federal Historic Preservation Program Task Force formed by the dozens of organizations and individuals who responded.

The Task Force has now completed its deliberations and we are pleased to submit our report: "Aligned for Success. . . Recommendations to Increase the Effectiveness of the Federal Historic Preservation Program." In it, we conclude that misalignments in the administrative structure of the federal program prevent it both from adequately supporting the vital work of state, local, tribal and private preservation partners and from broadly quantifying and disseminating their successes. In short, the structure keeps preservation's light under a bushel.

Our report builds on the earlier excellent work of an expert panel convened in 2008 by John L. Nau III, then Chairman of the Advisory Council on Historic Preservation, and P. Lynn Scarlett, former Deputy Secretary of the Interior. Their recommendations for improving the structure of the federal preservation program unfortunately remain largely unimplemented.

Today's report is also the product of extensive new work. We thank all the members of the public who answered our survey, made donations or attended our listening sessions; the partner organizations and their staffs, Dr. Carroll Van West and his students for their research, and especially the members of the Task Force themselves. In all, the Task Force's work involved over one thousand persons – a statistic that bears testament to the importance of these issues.

On a personal note, it has been a pleasure to serve as co-chairs of this effort, which we hope will indeed better align the federal historic preservation program for success.

Sincerely,

Andrew Potts
Chair

David Morgan
Chair

National Historic Preservation Act of 1966, Section 1

The Congress finds and declares that

- (1) the spirit and direction of the Nation are founded upon and reflected in its historic heritage;
- (2) 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;
- (3) historic properties significant to the Nation's heritage are being lost or substantially altered, often inadvertently, with increasing frequency;
- (4) the preservation of this irreplaceable heritage is in the public interest so that its vital legacy of cultural, educational, aesthetic, inspirational, economic, and energy benefits will be maintained and enriched for future generations of Americans;
- (5) in the face of ever-increasing extensions of urban centers, highways, and residential, commercial, and industrial developments, the present governmental and nongovernmental historic preservation programs and activities are inadequate to insure future generations a genuine opportunity to appreciate and enjoy the rich heritage of our Nation;
- (6) the increased knowledge of our historic resources, the establishment of better means of identifying and administering them, and the encouragement of their preservation will improve the planning and execution of federal and federally assisted projects and will assist economic growth and development; and
- (7) although the major burdens of historic preservation have been borne and major efforts initiated by private agencies and individuals, and both should continue to play a vital role, it is nevertheless necessary and appropriate for the Federal Government to accelerate its historic preservation programs and activities, to give maximum encouragement to agencies and individuals undertaking preservation by private means, and to assist State and local governments and the National Trust for Historic Preservation in the United States to expand and accelerate their historic preservation programs and activities.



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ACRONYMS

Advisory Council on Historic Preservation	ACHP
Certified Local Government	CLG
Department of Commerce	Commerce
Department of Energy	DOE
Department of Housing and Urban Development	HUD
Department of the Interior	DOI or Interior
Historic Rehabilitation Tax Credit Program	HTC
National Academy of Public Administration	NAPA
National Center for Preservation Technology and Training	NCPTT
National Conference of State Historic Preservation Officers	NCSHPO
The National Environmental Policy Act of 1969	NEPA
The National Historic Preservation Act of 1966	NHPA or the Act
National Park Service	NPS
NPS Technical Preservation Services	TPS
National Preservation Conference	NPC
National Register of Historic Places	NRHP
National Trust for Historic Preservation	NTHP
Office of Management and Budget	OMB
President's Council on Environmental Quality	CEQ
Senior Policy Officer	SPO
State Historic Preservation Office	SHPO
Tribal Historic Preservation Office	THPO



Executive Summary

The National Historic Preservation Act of 1966 (the “Act” or the “NHPA”) established a national preservation program based on a federal partnership with States, Indian Tribes, Native Hawaiians, local governments, nonprofit organizations and the private sector. These partners carry out the bulk of preservation in the United States. The Act tasked the federal government with encouraging their work and ensuring that America’s vital legacy of not just the “cultural, educational, aesthetic [and] inspirational” but also the “economic and energy benefits” of historic resources “be maintained and enriched for future generations of Americans.” Congress delegated these federal responsibilities to the Department of the Interior (“Interior” or “DOI”), who in turn assigned their administration to the National Park Service (“NPS”).

In the past 45 years the American historic preservation and heritage partners have remade themselves into the multifaceted movement envisioned by the Act and proved the power of preservation to serve as a catalyst for job creation, community revitalization, energy conservation, and enhancement of community and national pride. But while the preservation partners have made great strides in realizing the ideals of the Act, the federal component of the national preservation partnership has not kept pace. In order to create an effective partnership for unleashing the potential of the nation’s heritage resources to contribute to meeting America’s most pressing national goals and to further realize the intent of the National Historic Preservation Act in the 21st century, the federal historic preservation program must change.

The Vision

The Task Force envisions an administrative structure for the federal Historic Preservation and Heritage Partnership Programs (“Partnership Programs”) that propels these programs into a leadership role in job creation, energy independence, better international relations through public diplomacy, heritage conservation and the forging of efficient and effective public-private partnerships to advance these goals.

The Task Force defines the “Partnership Programs” as the federal preservation activities that require the regular involvement of non-federal participants such as those defined in Title I of the National Historic Preservation Act and carried out by States, Tribes, local governments, and the National Heritage Areas movement, and federal agency preservation programs related to these activities. These programs include the National Register of Historic Places, the Federal Rehabilitation Tax Credit Program, and federal Grants-in-Aid programs among others.

To be effective, leadership of these Partnership Programs should:

- Be accountable for the performance of the national preservation program
- Enable collaboration across program constituencies
- Advocate for the national preservation program, particularly with regard to funding
- Achieve innovation and flexibility
- Make historic preservation visible at all levels.

Effective leadership of the Partnership Programs will result in greater leveraging of heritage-related private investment, streamlined regulatory and grant application reviews that remain true to national preservation standards, an effective voice for the Preservation and Heritage Partnership Programs within the Department of the Interior, and in the development of preservation-based public policy related to community and economic development, energy independence and environmental sustainability across the federal government.

Why Is Change Needed?

A strong consensus has emerged from the work of the Federal Historic Preservation Program Task Force and recent studies undertaken by the National Academy of Public Administration and the Preserve America Expert Panel that the current federal structure for administering the Preservation and Heritage Partnership Programs (what the NPS has called “External” or “Community Assistance” programs) is not adequate to realize the potential of heritage conservation to advance national goals in the 21st century.

The recommendations of the Task Force are based on the following findings:

- The current administrative structure of the federal historic preservation program does not provide for the levels of leadership, public and private partnership, advocacy, innovation, and visibility required to realize the transformative vision for historic preservation set forth in the 1966 Act.
- The breadth of the preservation vision set forth in the 1966 Act reaches into the nation’s communities and policy making arenas related to economic development and community and environmental sustainability, extending far beyond National Park boundaries. It is critical that the federal government realign the administration of the Partnership Programs to provide leadership capable of achieving the vision of the 1966 Act, with the expertise, flexibility and accountability needed to advance them.
- Closer integration of the Preservation and Heritage Partnership Programs into the administrative structure of inside-park cultural resource management will not serve either the individual parks or the Partnership Programs well. The goals and cultures of these two areas of activity are very different. Placing both of these responsibilities under a single leader puts parks and the Partnership Programs in competition with each other for resources, and it puts curatorial preservation concerns ahead of efforts to harness the nation’s heritage resources for the broad array of public goals envisioned by the 1966 Act.

A diverse segment of the public and the preservation community believes that transferring the Partnership Programs to an independent federal preservation agency or a separate bureau within the Department of the Interior would be the best structure to empower property owners and local agencies to use heritage preservation to create jobs and advance community sustainability. However, the Task Force believes that in keeping with the current fiscal imperative to do more with less, positive change can be accomplished through the realignment of current resources, with the understanding that the preservation community will revisit the results of these changes in two years to determine if they have been effective.

Recommendations

Deep budget cuts exacted in 2011 and proposed again for 2012 have created both an imperative and an opportunity to revitalize the Partnership Programs so that Congress, the Administration and the American people unambiguously see them as realizing the promise of the National Historic Preservation Act and meeting the urgent needs of the 21st century. To do this, the Federal Historic Preservation Program Task Force posits that the federal component of the Partnership Program currently administered by the NPS must be realigned and strengthened to create a structure fully aligned with the provisions of the Act and of furthering the economic development, energy and resource conservation and community-strengthening potential of historic resources. The Task Force’s recommendations are:

- 1. Make historic preservation visible and accountable by realigning responsibilities for Preservation and Heritage Partnership Programs within the National Park Service under a Deputy Director for Historic Preservation and Heritage who reports to the Director of the National Park Service.** The Task Force findings indicate that the Partnership Programs will not thrive in NPS unless they gain a more elevated and independent position within the NPS hierarchy. This is not an issue that individual leadership can overcome in the long term, but one of structural necessity to institutionalize and elevate historic preservation within the federal government so that true national leadership again becomes feasible. The Task Force envisions a single Deputy Director who reports directly to the Director of the National Park Service. The sole responsibility of this Deputy Director would be overseeing the various Partnership Programs described in Title I of the 1966 Act and administered with Tribes, States, and localities, as well as National

Heritage Areas. This approach will provide leadership that is accountable solely for the advancement of the outward focused preservation Partnership Programs.

Further, to insure success, the Deputy Director for Historic Preservation and Heritage needs expanded staff expertise in the areas of economic development, energy efficiency and environmental sustainability to complement existing resource protection expertise. Together, these actions will facilitate more efficient and effective administration of local designation activities, tax credit investment projects, and National Heritage Area administration. The Task Force believes that these changes can be accomplished at minimal expense and with the existing number of personnel through the reassignment and reorientation of existing positions.

- 2. Designate a Senior Policy Officer for Historic Preservation and Heritage in the Department of the Interior to serve as a Special Advisor for Heritage to the Secretary of the Interior.** The Task Force strongly believes that it is time for the Department of the Interior to take a strong leadership role in historic preservation. As steward of the federal preservation program, and as the Agency designed by Congress to be responsible for much of the National Historic Preservation Act, Interior needs to become a true leader and advocate for historic preservation across the agency and throughout the administration.

The Senior Policy Officer for Historic Preservation and Heritage in the Department of the Interior and Special Advisor for Heritage to the Secretary of the Interior will oversee the implementation of the National Historic Preservation Act throughout the Department of the Interior's bureaus and offices, as required under Executive Order 13287 (Preserve America). This officer will advise the Secretary of the Interior on all matters related to heritage preservation, including preservation's ability to contribute to departmental, national and international goals and ensure that heritage partnership programs have a place in departmental priority setting and resource allocation. The information gathered by this officer will also allow the Secretary to introduce preservation-based strategies to solving national issues into the deliberations of the Domestic Policy Council. Designation of this officer will provide the agency-wide cultural resource coordination initially sought by the 1966 Act.

- 3. Make the Advisory Council on Historic Preservation Chairman a full-time position.** The Task Force has identified a need to strengthen leadership and increase visibility for historic preservation and heritage at the federal level: a full-time ACHP Chairman appointed by the President will help accomplish this. It will allow the Council to fulfill its Congressionally-mandated responsibilities to advise the President and Congress on matters relating to historic preservation and improve coordination of preservation activities of Federal, State, and local agencies and private institutions and individuals, while also carrying out its critical responsibilities for administering the Section 106 review process.

A full-time ACHP chair would be in a better position to work closely with the leadership of the Partnership Programs to facilitate more inter-agency cooperation in their administration, and with the Secretary of the Interior to provide leadership and advocacy for historic preservation within the Administration. The full-time chair will also initiate a process to identify opportunities for greater efficiency in how preservation responsibilities are allocated and carried out between the ACHP and the NPS. Furthermore, a full-time chairperson will be better positioned to engage in government-to-government consultation with tribes; international agencies and organizations; and with other key Executive Office initiatives, panels and councils. Designation of a full-time Chair should be pursued initially as an administrative action by the President, evaluated, and if successful, be established statutorily at a later date.

- 4. Designate a senior staff position for historic and cultural resources on the President's Council on Environmental Quality ("CEQ").** The National Environmental Policy Act of 1969 (NEPA), which CEQ helps to implement, promotes a national policy designed among other things to "preserve important historic, cultural, and natural aspects of our national heritage." The fact that NEPA has always included cultural and historic resources has often been overlooked. Natural resource programs have had an Executive Office champion in the CEQ but the agency with comparable responsibilities for the preservation program (the ACHP) is not currently represented in the Executive Office. Having a voice for historic preservation and cultural resources at CEQ will ensure that historic preservation and the roles it plays in energy savings, sustainability, and environmental quality are part of Council deliberations as intended by NEPA.



The Federal Rehabilitation Tax Credit Program, managed by the National Park Service, which in 2010 created more than 41,000 jobs and leveraged over \$3.4 billion in private investment should be touted as a model program during these challenging economic times. It not only facilitates the restoration of historic buildings, but it spurs additional construction and investment. Pictured is the Enterprise Mill in Augusta, GA, which has been adaptively reused for office space, housing, and the Interpretive Center for the Augusta Canal Heritage Area.

The Task Force envisions an administrative structure for the National Preservation Partnership Programs that propels these programs into a leadership role in heritage conservation, job creation, energy independence, public diplomacy and the forging of efficient and effective public-private partnerships to advance these goals.

Chapter One: Introduction

Genesis and Scope of this Report

The National Historic Preservation Act of 1966 is the fundamental charter of federal historic preservation policy. It is premised on an explicit choice by Congress that the outright ownership of key national landmarks by the U.S. Government should not be the chief end of federal preservation policy, as it had been before the Act. Instead, Congress laid down a new mandate in the Act that the aim of the federal government should be to encourage the “private preservation” of “all useable elements of the Nation’s historic built environment,” as well as to provide for the stewardship of federally-owned assets. To effectuate this shift, Congress established a new program of federal policies and financial incentives designed to “contribute to the preservation of non-federally owned prehistoric and historic resources and give maximum encouragement to organizations and individuals undertaking preservation by private means.”

This national historic preservation program, Congress said, was to be implemented through partnerships with States, Indian tribes, Native Hawaiians, local governments, nonprofit organizations like the National Trust for Historic Preservation and, of course, the private sector. Administration of the federal component of these partnerships was assigned by Congress to the Department of the Interior and by Interior to the National Park Service. And, while cultural and educational aims were to be important parts of this program, the Act’s remaking of federal historic preservation continued with an innovative declaration that America’s vital public interest in historic preservation lies in “maintaining and enriching” not only the aesthetic and inspirational but also the “economic, and energy benefits” of historic resources.

Today, the American historic preservation movement has been remade in the image of the multifaceted approach championed by the Act. The movement concerns itself with preservation craft but also job creation, historic documentation and energy modeling, education and smart growth, alike. From historic preservation nonprofits to local preservation commissions, preservation staffs and professionals embrace the spectrum of skill sets necessary to meet this interdisciplinary mandate. A few statistics highlight the complexity and diversity of preservation efforts achieved in 2010 across the U.S. by States and local governments, nonprofits and private building owners:¹

1. 2010 Historic Preservation Fund Report, <http://www.preservationaction.org/Reports/2010 HPF Report.pdf> (accessed May 12, 2011).

- Private sector owners of historic buildings used the Federal Historic Rehabilitation Tax Credit Program to generate over \$3.42 billion of private investment, while creating more than 41,000 estimated jobs and 5,514 low and moderate income housing units.
- State Historic Preservation Offices reviewed 242,000 Federal undertakings, compared to 106,900 in 2009, providing 112,000 National Register eligibility opinions. Tribal Historic Preservation Offices reviewed 34,600 undertakings and made 7,150 eligibility opinions.
- 49 new communities became Certified Local Governments, bringing the cumulative total to 1,763 CLGs throughout the nation.
- The incidence of LEED platinum and gold-rated historic rehabilitations has continued to grow as did interest in introducing alternative energy strategies to historic buildings.
- Over 87 million people visited National Heritage Areas, where innovative approaches to partnering have resulted in a 5:1 ratio of private to federal dollar investment while strengthening local economies and enhancing local pride of place.²

So too has America changed. When the Act was passed, it was widely believed that communities had to choose between preservation and economic development. Older and historic business districts at the core of almost every American city were experiencing job loss and large scale de-population. Older and historic residential neighborhoods were becoming homes to stubborn concentrations of poverty, even while historic preservation was traditionally equated with a concern for only a handful of stately homes. In 1966, the impact of buildings on energy use and the environment was less well understood. Focus was often on new construction and modern technologies with historic buildings negatively viewed as outdated energy hogs.

Today many reject the old “preservation versus development” paradigm. They understand that city centers and older neighborhoods have unique attributes that lend themselves to the new economy, including walkable streets, well developed infrastructure, public transit, dense employment centers, and rich social and cultural amenities. Led by nonprofits, local governments and private developers, preservation-based economic development strategies have revitalized neighborhoods and downtowns across America and provided thousands of jobs nationwide. Privately-owned historic buildings have been widely adaptively reused for affordable housing, while heritage tourism has provided added stimulus to communities, particularly in rural areas. Moreover, these areas of heritage are important centers of regional identity; their distinctive feel fosters a civic “Pride of Place,” which often acts as a catalyst for change. Communities are hungry for data and strategies on how to leverage their own historic assets as a positive component of development.

The advent of the 21st century, and its focus on energy conservation has sparked a new paradigm of sustainable growth and progress centered on the conservation and recycling of existing building resources. Rather than demolishing billions of square feet of our current building stock and sending the resulting waste to landfills, much of that space can be adaptively reused thereby conserving not only materials, but their embodied energy. Meanwhile, a combination of new technologies and traditional design strategies has established that the oldest buildings can perform at the most demanding standards of energy efficiency. Further research, development, product innovation and the establishment of best practices and rating systems for retrofitting historic buildings are consequently in increasing demand.

In short, the accomplishments of the preservation movement in the forty-plus years since the Act was adopted have been remarkable, while the potential for future accomplishments is resoundingly strong. Moreover, the core values of America’s “irreplaceable heritage” identified in the National Historic Preservation Act – cultural inspiration and economics, energy and education – reflect almost perfectly the core concerns of America at the moment. Such

2. “2009 at a Glance,” [http://www.nationalheritageareas.com/docs/ANHA At a Glance.pdf](http://www.nationalheritageareas.com/docs/ANHA%20at%20a%20Glance.pdf) (accessed May 12, 2011).

promise twinned with such relevance prompted many to expect new heights of achievement for the partnership programs as we approach the 50th anniversary of the 1966 Act.

And yet, in 2010 and 2011 Congress and the White House unambiguously signaled that the case for this has not been adequately made. Federal funding for the national historic preservation program was not only reduced as might be expected in a time of budget deficits, but reduced in a manner vastly out of proportion to the cuts decreed for other areas of domestic spending. No new initiatives at either the congressional or the agency level were proposed. The prospects for 2012 remain equally difficult:

- Funding for Save America's Treasures brick-and-mortar restoration initiatives and Preserve America heritage tourism programs was eliminated in 2011, and it has been targeted for elimination again in 2012.
- Funding for National Heritage Areas has been targeted for a 50% decrease.
- Despite enormous growth in responsibilities, the funding for State Historic Preservation Offices, when adjusted for inflation, has not changed since 1983. SHPOs would benefit greatly from the streamlining of federal/state procedures.
- With growth in the number of CLGs, the average grant amounts awarded to support local preservation initiatives are ten percent less than they were in 1995 and 65 percent less than in 1986.
- The Historic Preservation Fund, established in 1976 to be the dedicated source of funding for the federal historic preservation program (generated via lease revenues from the Outer Continental Shelf), authorized at \$150 million per year, has rarely seen an appropriation greater than 50%.

What could account for this disconnect? At the same time that our economy, job loss, foreign wars, energy dependence and other issues remain pressing, the current era is witness to a significant focus on reducing federal spending and wringing more value out of every dollar spent on federal programs. It is clear that every federal program must widely demonstrate its vitality, relevance and ability to contribute to addressing the most pressing issues of the day. With the historic preservation program, this means proving every day that the program does indeed maintain and enrich in a cost effective and vital way the cultural, educational, aesthetic, inspirational, economic, and energy benefits of America's historic resources.

Based upon years of study and discussion and numerous earlier blue ribbon reports, many suspected that if the potential of preservation programs was not being fully realized or perceived, that this failing might be a consequence of structural issues and misalignments in the formal organization of the federal administration of the programs themselves. While historic preservation across America has evolved into the multifaceted approach promoted by the Act, the function and organization of the federal component has not seemed to keep pace. In recent years, it has suffered from severe budget cuts, key management posts being left unfilled for months or years, the shifting of staff and resources to other programs, a lack of coordination with other departments and a general lack of positive visibility. Attention to the economic and environmental benefits of historic resources, although passionately pursued by preservationists at other levels, has lagged at the federal level.

For example, as suggested above, as the need for energy efficiency has become even greater and concerns of energy independence stronger, the challenges and opportunities facing America's historic and older building stock are also greater than ever. Congress's decree that the preservation programs be managed to ensure the "vital legacy of . . . energy benefits" embodied in historic resource looms even larger. Preservation partners have been looking to the NPS to join them in addressing the role that the reuse of older and historic buildings plays in energy and environment policy, in championing the retrofitting of historic buildings to meet national building performance objectives, and to provide leadership in addressing research and development needs.

On June 16, 2009, the EPA, HUD and US DOT joined together to form the Interagency Partnership for Sustainable Communities. The Partnership's "Livability Principles" read like a preservation primer. It calls for coordinating federal policy to "increase community revitalization and the efficiency of public works investments and safeguard rural landscapes," and to "enhance the unique characteristics of all communities by investing in healthy, safe, and walkable neighborhoods." Expanding location- and energy-efficient housing and reorienting infrastructure and transportation priorities are other goals. Historic preservation should be at these tables with Interior/NPS as a contributor to federal interagency sustainability policymaking, but as currently organized NPS Partnership Program managers are not positioned to participate on an inter-agency basis and the NPS is not equipped with enough subject matter expertise.

Preservation creates jobs, and spurs downtown revitalization, heritage tourism and sustainable rural development. While construction materials are purchased from across the country or across the ocean, the labor is purchased from across the street and as a result, rehabilitation is a potent job creation strategy. Given this potential, and particularly during this time of economic need, it is critical that the federal preservation program live up to Congress's decree that the programs be managed to ensure the "vital legacy of . . . economic benefits" embodied in historic buildings. To many, this means a federal program that would at a minimum serve as a repository for expertise on preservation-based economic strategies, and spur the development of generally accepted metrics for rehabilitation, historic preservation and heritage tourism that can be used to measure and analyze the direct and indirect economic and environmental impacts of preservation.

While these domestic issues loom large, it should not be forgotten that the framers of the Act also understood the role that historic preservation could play in international relations. The Act specifically directs that the historic preservation program should provide "leadership in the preservation of the prehistoric and historic resources of the international community of nations." Although it is not currently, historic preservation could be a key component in America's public diplomacy efforts. For example, encouraging, assisting, and supporting each country's identification, protection and enhancement of its historic resources is an excellent use of American "soft power." Valuing local heritage resources is a tangible way to show respect for those cultures.

The foregoing discussion is not meant to provide a detailed work plan or a comprehensive set of policy prescriptions. Rather, it is meant to provide concrete examples of the difference between expectation and outcome and to illustrate how profound are the unrealized opportunities at hand.

It was against this backdrop that Preservation Action established the Federal Historic Preservation Program Task Force in March, 2010. The Task Force is composed of individuals and eleven partner organizations who share the common goals of:

- 1) Studying and reporting on the current and past structures of the federal component of the Partnership Programs;
- 2) Producing recommendations for creating an adequate and effective federal preservation program management structure;
- 3) Conducting a grass-roots advocacy campaign to enact these recommendations; and
- 4) Attaining a structure that enables the federal Preservation and Heritage Programs to succeed in realizing the goals of the National Historic Preservation Act.

The National Historic Preservation Act and the Preservation and Heritage Partnership Programs

Congress assigned federal leadership for most national historic preservation responsibilities created by the 1966 Act to the Department of the Interior. Most of this responsibility was in turn delegated by Interior to the National Park Service. Later, some NPS responsibilities were transferred to a newly independent federal agency, the Advisory Council on Historic Preservation.

The Task Force's mandate extended only to the subset of the historic preservation programs administered by the NPS that require the regular involvement of non-federal participants in the creation of a public/private partnership to further historic and heritage preservation at the State, local and Tribal levels. These include the activities defined in Title I of the National Historic Preservation Act and carried out by States, Tribes, local governments, and the National Heritage Areas movement, and federal agency preservation programs related to these activities. Core functions included are the National Register of Historic Places; the National Historic Landmark Program, the Federal Rehabilitation Tax Credit Program; administrative and oversight functions of federal Grants-in-Aid programs; federal agency preservation programs; the Save America's Treasures, Preserve America and National Heritage Area programs; the Certified Local Government program and other similar programs.

These programs have generally been referred to by the NPS as the "External Programs." Many Task Force members felt that the use of the term "External Programs" furthers the perception that these programs are extrinsic to the core NPS mission. The NPS itself has more recently used the term "Community Assistance Programs." The Task Force prefers the term "Preservation and Heritage Partnership Programs." That term, or "Partnership Programs" for short, is used in this report.

Search for a Workable Structure

The management structure of the Partnership Programs within NPS has been reorganized many times over the past 45 years, yet tension has persisted between the self-defined "core" mission of the NPS to manage and interpret federally-owned resources on the one hand and the aims of the Partnership Programs on the other. This nearly perpetual state of discomfort has resulted in a prolonged search for more effective, sympathetic and dynamic management structures. Over the years, many dramatic organizational changes have been proposed via congressional legislation, commissioned studies, or by preservation organizations such as the National Conference of State Historic Preservation Officers (NCSHPO) and the National Trust for Historic Preservation (NTHP). The current structure owes its chief characteristics to a reorganization effectuated in the early 1980s. As that structure has outlived its usefulness, the last five years have seen a series of proposals for reorganization and reform. To our knowledge, none of these modern proposals has received active consideration by the NPS or DOI.

From the very beginning, as Congress drafted the National Historic Preservation Act, a bureaucratic tug of war occurred between the National Park Service, tasked with historic preservation duties for federally-owned sites since its foundation in 1916, and the Department of Housing and Urban Development (HUD), which could play a vital role in historic preservation with its broader focus on quality of life and the built environment. The National Park Service won out and the historic preservation and heritage Partnership Programs have been housed there ever since with the exception of a brief period in the late 1970s when they were moved to an independent bureau elsewhere in the DOI. Despite its longstanding responsibility for historic preservation, in the minds of both the public and most NPS staff, the core mission of the NPS remains the protection and administration of the parks, national monuments, national sites and battlefields which the NPS directly oversees and, more specifically, those which contain more natural versus cultural resources.

As a result, a several decade-long battle for a functional and ideological home for the Partnership Programs, including several reorganizations and a brief stint in the Heritage Conservation and Recreation Service (a short-lived bureau within the DOI), has led to their position today under the Associate Director for Cultural Resources, who manages both internal and external historic preservation and heritage programs for the NPS and reports to the Deputy Director of Operations. The historic preservation and heritage program managers are seven organizational levels below the Secretary of the Interior; while the Associate Director is five levels from the Secretary and two levels from the NPS Director.

Meanwhile, both NPS historic preservation program leaders and interested parties outside of the NPS have advocated numerous times over the past four decades for dramatic changes to the management of the "external

programs” (and frequently the “internal” historic parks and programs as well). A brief timeline displays the many efforts to realign the programs in order to allow them to better achieve the goals of the NHPA:³

1973-74: Ernest Connally proposed a new agency, an “Administration of Cultural Affairs,” that would incorporate the Office of Archaeology and Historic Preservation (OAHP), NPS historical parks, the Smithsonian Institution, the National Endowments for the Humanities and Arts, the National Archives, and the performing arts administration. A separate bureau within DOI would be formed as an interim step. When this proposal was rejected, Connally suggested a compromise Historic Sites and Monuments Service within the office of the Assistant Secretary of the Interior.

1976-77: The National Conference of State Historic Preservation Officers proposed the creation of a Bureau of Historic Preservation within the Department of the Interior. One year later, the National Trust for Historic Preservation recommended that the historic preservation functions be moved to either an independent entity within DOI, or “perhaps even preferably” to a more sympathetic agency.

1977-80: Representative John F. Seiberling of Ohio introduced a bill that would move the Partnership Programs out of NPS and DOI to the newly independent ACHP. Two years later, Rep. Seiberling introduced a second bill, this one proposing an independent Historic Preservation Agency. Although several important amendments to the NHPA proposed by Rep. Seiberling were passed in 1980, his efforts to move the programs to the ACHP were overtaken by the foundation of the Heritage Conservation and Recreation Service bureau within DOI in 1978.

1978-1981: Under the Carter administration, the Heritage Conservation and Recreation Service (HCRS) was founded in 1978 as a new bureau within the DOI. The Secretary of the Interior moved the Partnership Programs out of the NPS and into the HCRS where they were partnered with former Bureau of Outdoor Recreation programs. HCRS was disbanded in 1981 under the Reagan administration and the Partnership Programs were merged back into the NPS.

1986-88: NCSHPO again advocated for an independent agency. Senator Wyche Fowler introduced legislation to establish a Historic Preservation Agency in 1988.⁴

1994: The NPS Advisory Board made recommendations to improve all aspects of program administration, but most of these were not implemented.

2003: President George W. Bush signed Executive Order 13287 of 2003 (Preserve America) with the goal of strengthening preservation efforts across the federal government and the United States. Subsequently, First Lady Laura Bush and the ACHP convened a Preserve America summit in New Orleans to evaluate the program and to suggest improvements to the federal preservation program in preparation for the 50th Anniversary of the NHPA.

2006-07: The National Park Service Advisory Board issued a series of recommendations for improving the administration of the Federal Historic Rehabilitation Tax Credit Program (key aspects of which may remain unrealized).⁵ Meanwhile, the NPS commissioned the National Academy of Public Administration (NAPA) to conduct an independent review, resulting in the December, 2007 publication of “Back to the Future: a Review of the National Historic Preservation Program.” The NAPA panel recommended “improvements to build capacity, enhance performance and strengthen national leadership.”⁶

3. All drawn from Barry Mackintosh, *The National Historic Preservation Act and The National Park Service: A History* (Washington, D.C.: History Division, National Park Service, Department of the Interior, 1986), <http://pawst.com/post/199244-mackintosh-barry-the-national-historic-preservation-act-and-the-national-park-service-a-history-national-park-service-1986> (accessed March 30, 2011).

4. Senator Wyche Fowler, Jr., S. 2912 (100th Congress), September 1988.

5. National Park Service Advisory Board, *Federal Historic Rehabilitation Tax Credit Program: Recommendations for Making a Good Program Better*, September 2006.

6. National Academy of Public Administration, “Back to the Future: a Review of the National Historic Preservation Program” (December, 2007), p. iii.

2008-10: Following further decline in the programs' funding, visibility and administration, an Expert Panel was formed by the ACHP and Deputy Secretary of the Interior in 2008 to again study the organization and make suggestions for improvement. The Expert Panel's report, containing seven recommendations for change, was issued in February, 2009. Meanwhile, the NPS once again commissioned NAPA to review the state of cultural resources programs within the NPS.⁷ NAPA's 2008 and 2009 reports concluded that there was dramatic need for improvement, and specifically recommended that management of Parks' internal cultural resources programs be separated from the management of the external Partnership Programs. And, finally, in 2010, the National Parks Second Century Commission issued several recommendations for improving NPS cultural resources management and Partnership Programs' capabilities.⁸

2010-11: Preservation Action and the Preservation Action Foundation convene the Federal Historic Preservation Program Task Force and enlist national preservation organization partners to study the programs from a grass-roots perspective, make recommendations for positive change, and to lobby for implementation of those recommendations. The Task Force's goal is to move quickly to impact the 2013 budget cycle in early 2012. Research and outreach began in August 2010; recommendations were drafted in February, 2011, and the report is now written. Lobbying for an improved federal historic preservation and heritage program will begin in June, 2011.

Study Methodology

The Federal Historic Preservation Program Task Force undertook four distinct research initiatives to document the history and trajectory of the Partnership Programs as well as to solicit opinions and assess organizational options to improve the effectiveness and efficiency of the federal program as a whole. These included producing three white papers, convening several discussion sessions with partner organizations and constituents, conducting fifty-five subject matter expert and stakeholder interviews and, finally, administering an online survey completed by 811 individuals. The methodology of these efforts is described below. The findings are excerpted and incorporated in chapters one and two of this report.⁹

White Papers

The Task Force commissioned three white papers to be researched and written on the following topics:

- **Paper One:** Defines the concept of "federal external preservation programs" and introduces the vision of those involved in the Historic Preservation Act of 1966 for how the "external programs" would work and how they would be organized.
- **Paper Two:** Establishes what issues have been identified in regard to the organization of the federal historic preservation function in the past and introduces solutions that have been proposed for improving the program's organization.
- **Paper Three:** Presents quantitative analysis regarding the staffing and resources devoted to external preservation programs over the defined period both in absolute terms and in comparison to the overall funding and staffing of the National Park Service.

These papers were undertaken by Professor Carroll Van West and his doctoral students in Public History at Middle Tennessee State University in summer 2010.

7. National Academy of Public Administration, "Saving Our History: A Review of National Park Cultural Resource Programs" (October, 2008); and *Towards More Meaningful Performance Measures For Historic Preservation* (January, 2009)

8. National Parks Second Century Commission, *Advancing the National Park Idea* (2010), p. 44. Specific recommendations included enhanced funding and full use of NPS's portfolio of community assistance programs; "reaching beyond park boundaries to deliver technical and financial aid for locally important natural, cultural, and historic landscapes"; and developing a multi-year strategic effort "to prepare the Park Service's heritage preservation and cultural programs to meet the challenges of the new century."

9. Task Force white papers, interview and survey findings are available in their entirety online at <http://www.preservationaction.org/taskforce.htm>.

Outreach and Discussion Sessions

Outreach and discussion sessions were held at historic preservation and heritage professional meetings in Salem, Massachusetts; Philadelphia, Pennsylvania; and Austin, Texas. The goal of these sessions was to assess preservation and heritage professionals' opinions about improving the current organizational structure of the Partnership Programs within NPS and the relative merits of possible new structures. In particular, discussion sessions evaluated interest in:

- 1) Creating a new agency devoted solely to historic preservation
- 2) Merging the Partnership Programs with the Advisory Council on Historic Preservation
- 3) Creating a new bureau within the Department of the Interior
- 4) Making leadership improvements but leaving the current structure the same

Subject Matter Expert and Stakeholder Interviews

The Task Force interviewed subject matter experts and stakeholders with a diverse array of experiences in historic preservation, cultural resources and heritage, in person or via telephone in order to:

- 1) Learn about their experiences, both positive and negative, with the preservation and heritage Partnership (aka "external") Programs within NPS
- 2) Gather feedback on other possible organizational structures
- 3) Assess opinions on the key criteria necessary to an adequate federal preservation program
- 4) Solicit ideas for how to enact the recommendations of the Task Force
- 5) Provide qualitative input to assist in the creation of the Task Force's quantitative survey

A list of individuals interviewed can be found in Appendix B and a copy of the Interview Questionnaire in Appendix C.

Quantitative Survey

The Federal Historic Preservation Program Task Force created a survey to gather quantitative data regarding the attitudes of preservation and heritage professional and interested parties across the U.S. about the federal program and its possible reorganization. The survey consisted of 15 questions addressing:

- 1) information about survey respondents
- 2) the criteria used by the Task Force to evaluate the effectiveness of the current program and possible alternative organizational structures
- 3) the current program and alternative organizational structures
- 4) Ranking the various alternative organizational structures
- 5) And implementation of the task force recommendations

A copy of the survey questionnaire is included in Appendix E. The Task Force survey was conducted online at surveymonkey.com between Monday, November 29 and Friday, December 17, 2010. Invitations to participate were distributed via the Task Force's member organizations and the Preservation Action and Preservation Directory websites. 1,282 respondents participated in the survey. 63% (811) of these participants completed Questions 2-12, the main body of the survey. These 811 responses were analyzed and reported in the Survey Findings available online at www.preservationaction.org.

Five Key Criteria for Effective Leadership

A significant aspect of the Task Force's endeavor has been to gain an understanding of the characteristics of an effective federal preservation program in relation to the objectives outlined in the National Historic Preservation Act

of 1966. With this understanding, the Task Force was able to not only produce a baseline image of how the current program is performing but also to evaluate proposals for reorganization. Looking forward to enactment of the Task Force's recommendations for structural realignment, these criteria will be used to judge the effectiveness of the reorganized program in the future in comparison to its effectiveness today.

Employing criteria developed by the Preserve America Expert Panel as a starting point,¹⁰ the Task Force posits that effective program leadership is leadership that possesses the standing, authority and wherewithal to:

1. Be accountable for the performance of the federal component of the Partnership Programs as well as for the effectiveness of the entire system of Partnership Programs (as implemented by all partners including tribes, states, local governments and citizens).
2. Enable collaboration and partnership with other federal agencies, with state and local governments, Indian tribes and native organizations, and with organizations and individuals undertaking preservation by private means.
3. Advocate successfully for the national historic preservation program across the federal government, particularly advocacy that sustains and increases investment in historic preservation and funding for national, State, local, and Tribal partnership programs.
4. Achieve innovation and flexibility while setting national standards that remain true to the purposes of the National Historic Preservation Act of 1966.
5. Make historic preservation and the Preservation and Heritage Partnership Programs visible to the public and at all levels of government, including within the program's home agency and across the federal government.

Subject matter experts, stakeholders and survey participants agreed that these are reasonably accurate measures of an effective federal preservation program. 71% of survey respondents felt that the characteristics described an effective program "well" or "very well." 18% were neutral (or didn't know), while only 11% believed that the five key characteristics described an effective program "badly" or "very badly." Many respondents and interviewees stressed that the fifth trait regarding visibility was the most significant indicator of a successful program and perhaps ought to be listed first. Most criticism leveled at the five traits evoked skepticism regarding the ability of federal program managers to be accountable for the performance and effectiveness of non-federal participants in the programs. Others who commented on the five key criteria questioned the legality of federal program management's advocacy for funding for the programs.

Given the strong majority support of the five key characteristics, the Task Force advocates their adoption as measures of the functionality of the federal component of the Partnership Programs.

10. The Preserve America Expert Panel's key criteria were 1) Enhancing coordination, 2) Nurturing partnerships and local preservation efforts, 3) Raising public awareness of historic and cultural preservation, 4) Generating and attracting funding for program implementation, 5) Enhancing program efficiencies, 6) Improve Leadership, and 7) achieve outcomes. "Recommendations to Improve the Structure of the Federal Historic Preservation Program" (February, 2009).



Few question the NPS's role in preserving historic buildings in our National Parks, which are owned by the Federal Government - such as in Valley Forge, PA, pictured above. But recognizing our government can not purchase every asset, our national historic preservation program was deliberately designed to do more.

“Stewardship of park cultural resources involves direct fiduciary responsibility for, and management of, structures, sites, and objects under NPS custody and control. In contrast, the national historic preservation program involves making grants, creating incentives, and issuing regulations designed to mitigate adverse consequences to historic resources that are under the control of others. The policies and skills required for the former are very different than the policies and skills required for the latter.”

Saving Our History: A Review of National Park Cultural Resource Programs, NAPA, 2008

Chapter Two: Research Findings

A strong consensus has emerged from the work of the Federal Historic Preservation Program Task Force and recent studies undertaken by the National Academy of Public Administration (NAPA) and the Preserve America Expert Panel that the current federal structure for administering the Preservation and Heritage Partnership Programs is not adequately aligned to realize the full potential of heritage conservation to advance national goals in the 21st century. In its research, the Task Force has identified three primary findings, regarding 1) the current administrative structure of the federal historic preservation program, 2) the realization of the goals of the National Historic Preservation Act, and 3) the integration of “external” and “internal” cultural resources management. These findings, described in detail below, have guided the Task Force recommendations for improving the federal preservation program, which will be presented in Chapter 3 of this report.

- 1. The current administrative structure of the federal historic preservation program does not provide for the levels of leadership, public and private partnership, advocacy, innovation, and visibility required to realize the transformative vision for historic preservation set forth in the National Historic Preservation Act of 1966.**

Federal historic preservation programs are generally led by one of two federal organizational entities that work with State and Tribal Historic Preservation Officers and the other Partners: the NPS and the Advisory Council on Historic Preservation, both of which have important roles to play in the federal, State, local, Tribal and private partnerships envisioned by the National Historic Preservation Act. The Task Force’s research concentrated primarily on the structure of the Partnership Programs within the National Park Service. However, time was also spent looking at other potential or current participants in the federal preservation activities (ACHP, DOI, CEQ, for example) to identify possible enhancements to their organizational structures to the extent it had bearing on the performance of the Partnership Programs.

NPS and the Historic Preservation and Heritage Partnership Programs

Within the NPS, the Associate Director for Cultural Resources manages both internal and external historic preservation and heritage programs. S/he reports to the Deputy Director of Operations, who in turn reports to the Director. The actual managers of the Partnership Programs themselves each report to one of three Assistant Associate Directors and are located seven full organizational levels below the Secretary of the Interior, while the Associate Director is five levels below the Secretary.

In its survey of preservation and heritage professionals and interested parties, the Task Force asked respondents to assess how well the current structure of the federal component of the Partnership Programs (“External Programs” in survey) meets the five key characteristics of effective leadership described below:

How well does the existing structure of the External Programs meet the following leadership objectives?			
Answer Options	very poorly or poorly	Neutral	very well or well
Is accountable for performance of national preservation program	41%	38%	22%
Enables collaboration across all preservation constituencies	53%	30%	17%
Advocates for the national preservation program, particularly in regard to funding	59%	29%	12%
Achieves innovation and flexibility	52%	36%	12%
Makes historic preservation visible at all levels	57%	28%	14%

“Poorly” and “very poorly” dominated opinion for all five key characteristics of effective management, although neutral ratings were quite high as well (in part due to the fact that “neutral” served as the response choice for “don’t know”). Respondents felt, in particular, that the current structure does not lend itself to advocating for the national preservation program nor does it make historic preservation visible at all levels. These opinions were borne out as well in the Task Force’s subject matter and stakeholder interviews.

As the history of the programs indicates, issues stem from the misalignment of the Partnership Programs within the National Park Service and the larger entity of the Department of the Interior. Very few interviewees or respondents believed that the NPS and the Department of the Interior were a “natural fit” for historic preservation programs built around State, local, Tribal and private partnerships. In fact, the stewardship and interpretation of even federally-owned historic resources under the control of the NPS has been an issue. The Organic Act of 1916 established the National Park Service to “conserve the scenery and the natural and historic objects and the wild life therein,” while the National Historic Preservation Act mandates that property-owning agencies “administer federally owned, administered or controlled prehistoric and historic resources in a spirit of stewardship for the inspiration and benefit of present and future generations.” Even so, many believe that the NPS’s greatest areas of interest have been the aquisition and protection of park lands and environmental resources, not the stewardship of its own historic buildings, let alone the management of federal preservation policy, grants or the preservation of privately owned resources.

The National Academy of Public Administration’s 2008 report entitled “Saving Our History” addressed issues with the management of federally-owned historic resources for which the NPS is responsible. It found that while the number of cultural resources for which the NPS is responsible has increased, funding and personnel resources have decreased. This is in stark contrast to natural resource programs. According to the report:

...inflation-adjusted funding for park cultural resource programs decreased by 0.2 percent per year from FY 1995 to 2008, while over the same period inflation-adjusted funding for natural resource programs increased by an annual average of 4.2 percent. While there was real growth in funding for park cultural resource programs FY 1995-2002...[F]unding for natural resource programs today is double that for park cultural resource programs, notwithstanding the fact that two-thirds of the 391 national parks were created because of their historic and cultural significance.¹¹

Staffing levels for cultural resource versus natural resource programs within the NPS mirror the financial picture painted above over the past decade and a half, with Cultural Resources staff shrinking 27% while Natural Resources expanded 31%.¹²

STAFFING LEVELS FOR SELECTED NPS PROGRAMS FY 1995-2007

Fiscal Year	Park Management	Cultural Resources	Natural Resources
1995	15,548	1,079	1,072
1996	14,997	1,023	1,045
1997	15,289	1,035	1,060
1998	15,638	1,088	1,133
1999	15,919	1,107	1,164
2000	15,417	991	1,147
2001	15,737	1,044	1,262
2002	15,865	1,043	1,397
2003	15,740	1,030	1,459
2004	15,419	958	1,405
2005	15,534	932	1,426
2006	14,997	912	1,394
2007	14,595	859	1,387
2008	15,161	785	1,407
Change in FTE 1995-2007	-387	-294	+335
Percent Change in FTE 1995-2007	-2.5%	-27.2%	+31.2%

The fact that the Partnership Programs are service programs devoted to cultural resources within a larger land-management bureau and agency, respectively, has a very real impact on funding, advocacy for and visibility of the programs. It is both difficult for the general public to understand why the NPS is involved with these programs and second nature for Parks management to favor natural resources within the NPS.¹³ Furthermore, the highest leader

11. NAPA 2008, *ibid.* xi.

12. *ibid.* p. 95.

13. This is true even when the funding ultimately comes from a different source, as is largely the case for key portions of the Partnership Programs which are generally funded via the Historic Preservation Fund, not through tax dollars or the NPS regular operating budget. This is even more of a problem for the National Heritage Areas and the Preserve America programs, which are not funded via the HPF and directly compete with Parks resources for resources.

and presumed advocate for historic preservation within the Department of the Interior is the Associate Director for Cultural Resources in the NPS, a position far down on the organization chart tasked with managing both “internal” parks cultural resources and “external” historic preservation and heritage programs. S/he is not in a position to gain the attention of the Agency Secretary, the cooperation of other agencies, or even necessarily the Director of NPS. Interviewees stressed again and again that this is a matter of structural deficiency not one of lack of good will or management capability on the part of the current or past NPS Associate Directors for Cultural Resources.¹⁴

NPS scrambles to get parks considered. This is what “they use their chips for,” not necessarily for historic preservation. It’s not that [the Associate Director of Cultural Resources] doesn’t talk to [the Deputy Assistant Secretary for Fish, Wildlife and Parks, DOI]; it’s that she’s not at his elbow when he’s making deals and drafting policy. Organizationally, that’s the way it is. –Interview

From a structural perspective, the National Park Service’s strong brand identity and close association with scenic natural parks, makes its administration of community-based historic preservation programs that much more challenging both internally and externally:

There is a noticeable difference in the NPS external and internal programs – in terms of local perception and the delivery of services by NPS. From the local perspective, the general public doesn’t associate NPS with non-park historic preservation activities and asks questions like ‘Why does NPS have to approve things at [the] local level?’ There’s a lack of clear identity for the external programs. The public might know some of the individual programs, but has no idea how the overall program works or is structured. –Interview

Dedicated NPS professionals administer the programs well under difficult circumstances, yet how much more efficient and effective could the programs be if they were better positioned to succeed?

Regarding the placement of the Partnership Programs within the Department of the Interior, most subject matter expert and stakeholder interviewees expressed the opinion that, although it wasn’t a particularly good fit, there was no clear and favorable alternative agency. Housing and Urban Development and Commerce were mentioned frequently as alternatives but generally dismissed as viable options. Task Force research participants believe that the advantages of remaining within the DOI are that it provides a measure of protection and consistency (versus being an independent agency); and that it has a long history with the historic preservation programs and a large and experienced support staff already in place.

The primary disadvantage of the Department of the Interior’s current management structure is that no one within the Secretary’s office serves as an advocate for historic preservation both within NPS, where the Partnership Programs are housed, and across the many bureaus of the agency, many of whom are the caretakers of numerous historic resources. As noted earlier, the NPS Associate Director for Cultural Resources is five organizational levels below the Secretary of the Interior. An organizational structure that both creates focus within the Secretary of the Interior’s office and raises the standing of the Partnership Programs within NPS, could create a positive scenario for substantive change in regard to strengthened leadership and its attendant goals of increased visibility; funding; inter-agency, state, local and organizational collaboration and cooperation; innovation; and accountability. In one interviewee’s words, such a structure would enable its leaders to “fight for the programs in their domain” and be “real advocates for what they’re in charge of.”

Increased collaboration and cooperation at all levels is desperately needed. Survey respondents, interviewees and discussion session participants noted the many ways in which collaboration might be improved and preservation could lead or become involved in important inter-agency initiatives. Through years of diminished funding, NPS Partnership Program staff “buried deep within the Park Service” have been afforded little opportunity for inter-agency cooperation or initiative. Survey respondents noted that they “do not see the external reach of the programs to other agencies,” stating “Preservation should be part of other agencies as well, such as housing, and economic development.”

14. Subject matter expert, stakeholder interviewee and discussion session attendee comments are paraphrased and italicized throughout the report. Direct quotations, generally gathered in the online survey, appear in quotation marks.

The current structure prevents Partnership Program staff from effectively positioning the programs to address these vital cross-agency and multi-partner needs. For example, with an organizational structure incorporating historic preservation leadership at a higher level within the NPS and DOI, the Green Historic Preservation Initiative - designed to be a multi-agency initiative to examine the intersection of energy efficiency policy and historic preservation - could have been convened by the National Park Service rather than the Environmental Protection Agency as it was. Preservation leadership within the Office of the Secretary of the Interior, representation on the President’s Council on Environmental Quality and a full-time ACHP Chair who could devote more effort to expanding inter-agency cooperation would effectively open channels of communication that NPS Partnership Program staff have not been able to implement alone.

When asked to rank other possible organizational options on their individual merit (regardless of the current economic climate) in the Task Force survey, historic preservation and heritage professionals and advocates overwhelmingly ranked “independent agency” the most preferable organizational option to achieve a functional federal preservation program. A “separate bureau within DOI” was the second most popular organizational option, while creating a “higher-level division within NPS” ranked third:

Rank	Organizational Option	Rating Avg.
1	Independent Agency	3.07
2	Separate Bureau within DOI	3.11
3	Higher-level Division within NPS	3.39
4	Elevate Preservation Leadership	4.01
5	Full-time ACHP Chairman	4.12
6	Consolidate into ACHP	4.37
7	No Change	5.93

Note: a lower rating average corresponds with a higher preference ranking.

The same group, when asked to take the current economic and political climate into account, ranked the options as follows:

Rank	Organizational Option	Rating Avg.
1	Higher-level Division within NPS	2.91
2	Separate Bureau within DOI	3.36
3	Elevate Preservation Leadership	3.69
4	Full-time ACHP Chairman	3.92
5	Independent Agency	4.25
6	Consolidate into ACHP	4.30
7	No Change	5.57

A Higher-level Division within NPS was strongly preferred to the other options, with “Separate Bureau within DOI” and “Elevate Preservation Leadership” ranked relatively closely in second and third place. “Independent Agency” falls to fifth place out of seven. Yet “No Change” was still the strongly least-preferred option. It should be pointed out that despite the strong feelings expressing a preference for change, the Task Force heard over and over again in its research about the many dedicated professionals within NPS and DOI and their tireless efforts under very

challenging financial and institutional constraints on the behalf of historic preservation and heritage in America. In other words, this was clearly not a problem of personalities or individuals, but truly a problem of structural alignment.

The Advisory Council on Historic Preservation

The Advisory Council on Historic Preservation was addressed in the Task Force’s research under the auspices of “Elevating Preservation Leadership.” The National Historic Preservation Act designates many roles for the ACHP:

“[T]he ACHP serves as the primary federal policy advisor to the President and Congress; recommends administrative and legislative improvements for protecting our nation’s heritage; advocates full consideration of historic values in federal decision-making; and reviews federal programs and policies to promote effectiveness, coordination, and consistency with national preservation policies.”¹⁵

However, the primary activities of ACHP staff involve encouraging other federal agencies to act as responsible stewards when their actions affect our nation’s historic resources.

The ACHP’s regulatory responsibilities have generally overshadowed its role as primary federal policy advisor and advocate for administrative and legislative improvements for historic preservation. These responsibilities specifically belong to the presidentially-appointed part-time Chairperson and the 22 statutorily-designated council members who meet quarterly to conduct council business. Although the ACHP’s mission is broad in terms of policy guidance and the promotion of historic preservation and heritage in the U.S., the general perception of what the ACHP accomplishes is very narrow: i.e., the mediation of Section 106 disputes. The Preserve America Expert Panel as well as many of those who participated in the various research initiatives of the Task Force felt that strengthening the leadership of the ACHP would serve to strengthen historic preservation and heritage within the NPS and DOI, across the federal government and consequently the United States:

A full-time ACHP chairman would be great if nominated by the president and approved by the Senate because it would elevate it and give more import to federal agencies and what they do. It could resonate with a lot more people about the importance of historic preservation. -Interview

Although some research participants feared the possible politicization of the role of the ACHP Chairperson, there was general consensus that a full-time Chairperson appointed with the advice and consent of the Senate would present a much-stronger platform for policy and legislative action along with much higher visibility for the federal historic preservation and heritage programs. It was also noted that the appointment of a full-time Chair could be accomplished via a short-term appointment within the Executive Office and need not require the amendment of NHPA in the near term, although if the position is a success, such an amendment would ultimately be sought.

President’s Council on Environmental Quality (CEQ)

The President’s Council on Environmental Quality was established within the Executive Office as part of the National Environmental Policy Act of 1969 (NEPA). Its role is to coordinate Federal environmental efforts in the development of environmental policies and initiatives. NEPA, which CEQ helps to implement, promotes a national policy designed to “preserve important historic, cultural, and natural aspects of our national heritage.” Unfortunately, NEPA’s inclusion of cultural and historic resources has often been overlooked. Given the importance of historic preservation both to issues of environmental and community sustainability, the preservation community feels that it should play a significant role within CEQ.

15. <http://www.achp.gov/aboutachp.html>, accessed April 7, 2011. The composition and responsibilities of the ACHP are described in NHPA sections 201-15.

From their position deep within NPS, the Partnership Programs are not in a position to play a meaningful role in the implementation of NEPA. The Preserve America Expert Panel and those Task Force research participants who understood the possibilities of having a voice on the CEQ believed that it would not only raise awareness for historic preservation, but would allow historic preservation to make an important contribution to sustainability and environmental quality across the United States, a goal shared by the National Historic Preservation Act, NEPA, preservationists and communities large and small.

2. The breadth of the preservation vision set forth in the 1966 Act reaches into the nation's communities and policy-making arenas related to economic development and community and environmental sustainability, extending far beyond National Park boundaries. It is critical that the federal government realign the administration of the Partnership Programs to provide leadership capable of achieving the vision of the 1966 Act, with the expertise, flexibility and accountability needed to advance them.

As the 50th anniversary of the National Historic Preservation Act of 1966 approaches, the preservation and heritage community finds itself deeply immersed in furthering two critical components of the Act: the economic and energy benefits of historic resources. In order to assist the national movement, the Partnership Programs within the NPS must gain deep knowledge and competency in these areas. This will allow the federal program to complement the work of private organizations such as the National Trust for Historic Preservation which have developed programs (the very successful National Main Street program, for example) and policy and education initiatives (such as educating the public about the embodied energy in extant buildings and building materials) to further the goals of the NHPA and maintain historic resources for the future.

It is necessary for the NPS to further develop competency in these arenas and serve as a true federal partner to States, Tribes and local communities in order for historic preservation to play a powerful role across the nation, particularly via collaboration with federal agencies that make economic and energy conservation central tenets of their policy and actions.

The economy is the worst problem we have right now. It's devastating to me that preservation isn't considered to be an economic development tool. -NPC Session

There needs to be an increased focus on making stronger connections between sustainability and preservation and to raise the profile of historic preservation as an economic development and sustainability tool. -Interview

The Task Force heard in forum after forum that the movement as a whole has long recognized the key roles that historic properties, communities and landscapes can play in economic revitalization. The NPS, with its expertise in parks (and in wilderness parks, in particular) has neglected urban areas and has not fully developed the Certified Local Government program. Combined with a lack of visibility for the programs, the movement suffers at a time when historic preservation should be at the center of urban economic revitalization policy.

Historic preservation in its current form, on the one hand, stresses urban and economic renewal and revitalization. Heritage conservation and the National Heritage Area program, on the other hand, stress the integration of natural resources, heritage sites, folkways and the development of heritage tourism, all areas that also have been difficult to fully develop within the NPS. One interviewee noted that heritage areas see themselves as partners to the parks, but that some NPS staff perceive the heritage areas as interlopers that "steal funds" from the parks. Rather than discouraging growth and hindering the success of heritage areas, better leadership alignment within the NPS would create a stronger base of operations for these local and often rural economic and preservation engines.

The NPS's lack of subject matter expertise in heritage-based economic strategies has impacted the administration of the Partnership Programs in many ways. One of the most dramatic has been in its ability to support the programs in the annual appropriations process. As the Office of Management and Budget has demanded metrics to gauge the success of all federal programs, those without the ability to prove their economic worth have been particularly

vulnerable to budget cuts. This has been the case for the Save America's Treasures program, the only federal historic bricks-and-mortar grant program in the United States; Preserve America, a program designed to promote historic preservation through heritage tourism, education and historic preservation planning; and the National Heritage Area program, all of which have come under attack during the budgeting process. As became clear in the Task Force's public meetings and subject matter and stakeholder interviews, a lack of economic and other data has played a major role in marking programs to de-fund:

We have met with OMB and know what they are looking for: we need more metrics and evidence that these programs are effective in educating the public. [We] will be altering the application and reporting process to build in the measurement tools that we need. OMB understands that we don't have the information now but we have made a pledge to make sure we will going forward. -Interview

The Task Force believes that an improved administrative structure with significant expertise in economics, data gathering and analysis would better position the Partnership Programs for success in these difficult economic times and enable the programs, which are public/private partnerships, to better leverage the federal dollars that they do receive to spur private investment.

Economic and quantitative expertise would help Partnership Program administrators make a stronger case for the preservation of these programs when confronted with internal arguments that the heritage programs are outside NPS's "core mission," as occurred in *The National Park Service FY 2011 Budget Justifications* rationale for de-funding (or cutting the funding in half, in the case of the Heritage Areas) of the Save America's Treasures, Preserve America and Heritage Area programs: "This proposed reduction would allow the Park Service to focus on *those park activities that most closely align with its core mission.*"¹⁶ Recognizing that it might take many more years for historic preservation to be accepted as nearer to the core mission of the NPS, the Partnership Programs need quantitative and economic data now to combat those who believe that their benefits to communities and to America as a whole are unquantifiable and thus not worthy of further support.

The federal Historic Rehabilitation Tax Credit program ("HTC"), administered by NPS, implicates each of these issues. To date, consistent with the broad mandate of the Act, the HTC program has indirectly contributed to the federal government's influence on development, urban revitalization and affordable housing—all while achieving the correlative goal of stewarding our nation's heritage. Nonetheless, Task Force research also demonstrated that the HTC Program would be greatly enhanced by the development of expertise within the NPS in the dual arenas of real estate economics and sustainability. Real estate economics have always played a central role in redevelopment, and, as such, have been a key factor and cause for concern in NPS administration of the Historic Tax Credit program from the time of its origin. Sustainability issues have come to play a much more significant role in recent years.

Subject matter experts and survey respondents felt that the National Park Service has largely not addressed these demands of the NHPA, preferring a "curatorial" approach that has had adverse results for historic structures whose developers were either denied funding due to relatively minor preservation issues or chose not to participate at all due to the complexity and unpredictability of the process.¹⁷ As one discussion session attendee expressed it, "We need to balance the voice of the historian with the voice of the CFO." Further, the program would benefit greatly from streamlining and simplifying the process, which would benefit both State Historic Preservation Offices and developers.

[NPS is] good at protecting landmarks, but that's not what the tax credit is about, which is keeping old buildings in service. The program itself ought to be 30 times what it is. ... -Interview

As an end user of an historic tax credit, if we knew how much time and how complex the program was we would not have opted to use the historic tax credits. It's too complicated to make it easy for real estate developers. A lot of good could come if the program was useable. -NPC Session

16. Emphasis added. The Heritage Area justification also mentions that cutting funding "would comply with the FY 2010 Congressional directive for Heritage Areas to work towards becoming self-sufficient." National Park Service FY 2011 Budget Justifications, NR&P- 51.

17. See also the National Park System Advisory Board Report "Federal Historic Rehabilitation Tax Credit Program: Recommendations for Making a Good Program Better," September 2006.

Lack of leadership has also been an issue. The post of branch chief administering the HTC program was left vacant for three years. Even now that it has recently been filled, questions remain about access of NPS and Interior-level decision makers. All of this is occurring at the same time that HTC administration needs updating to meet the challenges of the 21st century. The HTC is often paired with the New Markets Tax Credit, run by the Treasury Department's CDFI Fund, which has been named as one of the government's top innovators. The dynamism with which that program is administered, its vigorous outreach and constant management innovations pose a counterpoint to the static, isolated administration of the HTC. Issues include the need for effective interface between the HTC program and complementary federal housing, energy and transportation goals, and for improved data collection, metrics and online interface.

The Partnership Programs also would benefit from a firmer grounding in energy independence, environmental sustainability and the role that historic preservation can play in these arenas. A lack of understanding of and knowledge about sustainability issues on the part of NPS were often mentioned as a matter of grave concern to users of the Historic Rehabilitation Tax Credit program:

My main concern is with the historic tax credit program and technical services program not being up to date on current challenges such as solar energy, energy issues therefore, we don't have a strong preservation voice with the appropriate skills and expertise addressing these issues. -Interview

Since this interview took place, the Secretary of the Interior has updated the *Standards for Rehabilitation with new Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings*, the "first set of official guidelines on how to make changes to improve energy efficiency and preserve the character of historic buildings." As the NPS notes, the new guidelines replace material not updated since 1992, indicating the difficulty that the NPS has encountered in staying current, let alone in addressing energy issues. Moreover, while the new Guidelines are a first step, more is needed. For example, there have been calls for a release of "best practices" or recommended treatments usable by owners of millions of historic buildings seeking to meet new efficiency standards called for by the DOE. There should be a way to measurably tie specific strategies to these standards, factoring in climate zone and building type. To do this, the NPS should be actively seeking a collaboration with the DOE and the EPA.

The preservation community envisions a future in which the NPS is able to fully participate in interagency initiatives and to develop educational and other programs of its own to protect historic resources from the onslaught of builders advocating new "greener" building at any cost and, in particular, historic window replacement in the name of increased energy efficiency. In the arena of window replacement, an entire industry has developed to replace old windows when in many cases the original windows would be more energy efficient to restore. If the federal preservation program was organized more effectively, the widespread destruction of historic windows might have been averted and might yet be slowed. In addition, the economic benefits of restoration, preservation and historic resources could be linked to both window restoration and preservation in general, to give only one example of the many contributions that historic preservation can make to this issue.

A stronger voice on the part of the ACHP and a presence on the CEQ would also assist the NPS in increasing interagency interaction in the administration of the Partnership Programs, and developing and pursuing economic revitalization and sustainability-related goals in program administration.

- 3. Closer integration of the Preservation and Heritage Partnership Programs into the administrative structure of parks-based cultural resource management will not serve either the individual parks or the Partnership Programs well. The goals and cultures of these two areas of activity are very different. Placing both of these responsibilities under a single leader puts parks and the Partnership Programs in competition with each other for resources, and it puts curatorial preservation concerns ahead of efforts to harness the nation's heritage resources for the broad array of public goals envisioned by the 1966 Act.**

In 2008, the National Academy of Public Administration recommended that either the Associate Directorate for Cultural Resources become a high-performing organization or that it be reorganized in order to better manage the historic parks and cultural resources under its care, noting that:

Stewardship of park cultural resources involves direct fiduciary responsibility for, and management of, structures, sites, and objects under NPS custody and control. In contrast, the national historic preservation program involves making grants, creating incentives, and issuing regulations designed to mitigate adverse consequences to historic resources that are under the control of others. The policies and skills required for the former are very different than the policies and skills required for the latter.¹⁸

The Task Force's findings support a similar conclusion: the co-management of the parks-based cultural resources and the external Partnership Programs ultimately benefits neither entity.

Since their placement in the NPS in 1966, the Partnership Programs have frequently suffered from their perceived competition with parks and parks-based cultural resources. For the past 25-plus years, the "external" programs have been managed alongside the parks' "internal" (i.e. federally-owned) cultural resource programs. The historic preservation and heritage community generally believes that this has not benefited the Partnership Programs due to the priority that parks' resources take in the time, focus and advocacy of NPS cultural resources leadership:

Based on my experience and all those things that have been tried, from a bureaucratic point of view the core mission of the NPS will always be overwhelming. The external programs will always be much lower in priority than the parks. –NPC Session

"I think it would be self evident that of the three missions for Cultural Resources in the NPS, the park-centered programs receive the majority of attention (and I think that is probably valid given the needs and priorities of the parks.) Therefore it might make sense to have Director of External programs who reports directly to the Park Service director without having to compete with the internal park issues at three levels before reaching administration." –Survey

As alluded to in the NAPA 2008 report and echoed in Task Force survey comments, a primary detriment of the internal/external program alignment is a structural inability on the part of NPS leadership to fully develop and pursue the particular skills needed by the Partnership Programs. Rather than spending much of his or her time looking *inside* to Parks and mastering the bureaucracy and politics of internal parks administration, a Deputy Director for Historic Preservation and Heritage could focus time and resources on understanding the needs of the States, Tribes and local communities and organizations served by the grant programs; furthering the economic development and sustainable potential of historic resources as demanded by the NHPA; and visiting non-federal sites of significance in order to raise the visibility of the programs. In short, the outward-focused and multi-disciplinary nature of historic preservation will be much better served by a leader and management team devoted solely to realizing its potential:

"Many people have argued that the way historic preservation is nestled in the NPS doesn't make a whole lot of sense considering the broader scope of preservation issues in the country. Surely, there must be a better organizational structure that expresses the multidisciplinary quality of preservation." –Survey

"... [I]t has been my experience that cultural resources within NPS parks are dominated by Internal Programs and Superintendents of the parks. The current structure does not

18. NAPA 2008, Op. cit., p. 55. The report continues: "The Panel urges NPS to weigh the overall advantages, disadvantages, and tradeoffs involved in creating a separate Associate Director for Park Cultural Resources. In the Panel's view, there is a strong argument for the equal organizational status of park cultural resources with natural resources."

operate in a way that is constructively collaborative even within the Park Service itself, to say little of the visibility and collaborative engagement of other federal agencies.” –Survey

Throughout its research, the Task Force was urged by research participants to encourage close cooperation between parks cultural resources and the Partnership Programs, especially in order to protect standards that need to be held in common between the two. Certainly, the Task Force strongly advocates close and sustained communication between inside-park and historic preservation Partnership Programs. Nonetheless, our findings, similar to NAPA’s, suggest that a separate organizational structure would improve the efficiency and effectiveness of both the Partnership Programs and cultural resources within the National Park Service.





There is no shortage of opportunity regarding historic buildings. Vacant, deteriorating or underutilized buildings either on the National Register of Historic Places or in National Register Historic Districts, such as the Vanity Ballroom in Detroit, Michigan are in need of rehabilitation. Strong leadership in the administration of our federal historic preservation program can help leverage existing programs as well as private investment to return these buildings to service.

“...external programs are not a good fit with management of park units. The issues, stakeholders, clients, relationships with local governments and constituencies are very different.”

Interview

Chapter Three: Recommendations

The deep budget cuts exacted in 2011 and proposed again for 2012 have created both an imperative and an opportunity to revitalize the Partnership Programs so they are unambiguously seen as realizing the promise of the National Historic Preservation Act and meeting the urgent needs of the twenty-first century. To do this, the Federal Historic Preservation Program Task Force posits that the federal component of the program currently administered by the NPS must be realigned and strengthened to create a structure fully supportive of the provisions of the Act and of furthering the economic development, energy and resource conservation and community-strengthening potential of historic resources.

The Task Force firmly believes that significant improvements in these critical areas can be achieved at little cost through the reallocation of existing resources. The Task Force’s goal is not to criticize NPS for its prior administration of the programs under its care, but rather to provide the dedicated preservation and heritage professionals at NPS a new platform better adapted to accomplish the nationally important goals declared by the 1966 Act and more relevant today than ever.

The Task Force envisions an administrative structure for the Preservation and Heritage Partnership Programs that propels these programs into a leadership role in heritage conservation, job creation, energy independence, and the forging of efficient and effective public-private partnerships to advance these goals.

A broad consensus exists within the preservation community that transferring the Partnership Programs to a separate federal preservation agency or a separate bureau within the Department of the Interior would be the best structure to empower property owners and local agencies to use heritage preservation to create jobs and advance community sustainability, develop heritage tourism, and inspire citizens with a pride of place and sense of history. However, the Task Force and preservation community as a whole also believe that in keeping with the current imperative to do more with less, benefits will derive from less dramatic changes that can be accomplished with the realignment of current resources. Therefore, the Task Force proposes four essentially budget-neutral improvements that work within existing agencies and councils.

Our member organizations and constituents are in agreement about the need for these changes and will work together to see that they are enacted. Optimally, the individuals tasked with the positions described below will

meet on a monthly basis to coordinate work more efficiently and effectively across the federal government and raise awareness of the contributions that heritage preservation brings to the life of this nation. The preservation community will revisit the results of these changes two years after implementation to determine if they have been effective.

The Task Force's recommendations are:

1. Make historic preservation visible and accountable by realigning responsibilities for the Preservation and Heritage Partnership Programs within the National Park Service under a Deputy Director for Historic Preservation and Heritage who reports to the Director of the National Park Service.

The National Historic Preservation Act provides that it “shall be the policy of the Federal Government . . . to provide leadership in the preservation of the prehistoric and historic resources of the United States and of the international community of nations and in the administration of the national preservation program in partnership with States, Indian tribes, Native Hawaiians, and local governments.”

The Task Force findings indicate that the Preservation Partnership Programs will not thrive in the NPS unless they gain a more elevated and independent position within the Parks hierarchy. This is not an issue that individual leadership can overcome in the long term, but one of structural necessity to institutionalize and elevate historic preservation within the federal government so that true national leadership again becomes feasible. The Task Force envisions a single Deputy Director who reports directly to the Director of the National Park Service. The sole responsibility of this Deputy Director would be overseeing the various Partnership Programs described in Title I of the 1966 Act and administered with Tribes, States, and localities, as well as National Heritage Areas.

The Task Force envisions a Deputy Director who will:

- Engage with States, Tribes, local communities, and non-government organizations to fully realize the goals of the 1966 NHPA
- Initiate and participate in interagency projects reflecting the multidisciplinary nature of historic preservation and heritage
- Focus on urban, suburban, small town and rural sustainability and revitalization needs and the heritage tourism potential of historic resources
- Develop a culture of innovation within NPS responsive to the economic needs and potential of historic resources
- Provide leadership on international preservation matters
- Engage historic preservation in the national quest for energy independence
- Work closely with Parks Cultural Resources to ensure consistent standards and adherence to the vision and principles of the NHPA
- Advocate and be accountable for the Partnership Programs
- Raise the visibility of historic preservation and heritage in the United States and the world

A director solely responsible for Partnership Programs will provide leadership that is accountable solely for the advancement of the outward-focused preservation partnership/assistance programs. Further, to insure success, this department will need expanded staff expertise in the areas of economic development, energy efficiency and environmental sustainability to complement existing resource protection expertise. This can be accomplished in a budget-neutral manner by reassigning some existing staff positions. Together, these actions will facilitate more efficient and effective administration of local designation activities, tax credit investment projects, and Heritage Area administration.

The establishment of such a Deputy Director position can be accomplished in various ways that do not require additional full time equivalent employees. For example, parks-based responsibilities could be consolidated under another existing Deputy Director. Or, inside-park cultural resource management responsibilities could be assigned

to either a new Associate Director for Parks Cultural Resources, if this can be done in a budget-neutral manner, or to the Associate Directors of Park Planning, Facilities and Lands and of Partnerships and Visitor Experience. Then the existing Associate Director for Cultural Resources could be elevated to a Deputy Director position, with the responsibility for the Partnership Programs. Either of these would serve to integrate inside-park cultural resource protection with other inside-park management activities and could be carried out in a way that responds to inside-parks cultural resource program issues identified in the NAPA 2008 “Saving Our History” report but not yet addressed. The reorganization should achieve greater efficiencies at current staff levels in light of the current challenging economic climate. Further, the Task Force stresses the need for continued close coordination between the Partnership Programs and internal parks historic and cultural resources in order to maintain the integrity of the Secretary of the Interior’s Standards for Rehabilitation.

2. Designate a Senior Policy Officer for Historic Preservation and Heritage in the Department of the Interior to serve as a Special Advisor for Heritage to the Secretary of the Interior.

The Task Force strongly believes that it is time for the Department of the Interior to take a strong leadership role in historic preservation. As steward of the federal preservation program, and as the Agency designed by Congress to be responsible for much of the National Historic Preservation Act, the DOI needs to become a true leader and advocate for historic preservation across the agency and throughout the Administration.

The Task Force has identified a need for a dedicated historic preservation and heritage official within the office of the Secretary of the Interior. In their role as Senior Policy Office for Historic Preservation and Special Advisor for Heritage to the Secretary, this person will oversee the implementation of the National Historic Preservation Act throughout the Department of the Interior’s bureaus and offices, as required under Executive Order 13287 (Preserve America). This officer will advise the Secretary of the Interior on all matters related to heritage preservation, including preservation’s ability to contribute to departmental and national goals and ensure that the Partnership Programs have a place in departmental priority setting and resource allocation. The information gathered by this officer would also allow the Secretary to consider preservation-informed strategies when addressing national issues and to bring this knowledge to the deliberations of other executive entities such as the Domestic Policy Council.

Designation of this officer will provide cultural resource coordination across the bureaus of the DOI as initially sought by the 1966 Act. The current structure attempts to accomplish a piece of this by combining Partnership Programs with parks-based cultural resource management within the NPS, but the Task Force believes that the Partnership Programs need to have identity and resource allocation separate from inside-park functions, as described above. A SPO/Special Advisor to the Secretary would accomplish coordination between stewardship of Interior-managed resources and the Partnership Programs while at the same time maximizing the effectiveness of these separate programs.

3. Make the Advisory Council on Historic Preservation Chairman a full-time position.

The Task Force has identified a need to strengthen leadership and increase visibility for historic preservation and heritage at the federal level. The Task Force believes that a full-time ACHP Chairman appointed by the President will help accomplish this. It will allow the Council to fulfill its Congressionally-mandated responsibilities to advise the President and Congress on matters relating to historic preservation and improve coordination of preservation activities of Federal, State, and local agencies and private institutions and individuals, while also carrying out its critical responsibilities for administering the Section 106 review process. Furthermore, a full-time chairperson will be better positioned to engage in government-to-government consultation with Indian tribes; international agencies and organizations; and with other key Executive Office initiatives, panels and councils.

A full-time ACHP Chairperson will work closely with the Deputy Director for Historic Preservation and Heritage to facilitate interagency collaboration and policy coordination in the administration of the Partnership Programs. The

full-time Chair would also be better positioned to work with the Secretary of the Interior to provide leadership and advocacy for historic preservation within the Administration and across agencies. In order to accomplish the goals of the National Historic Preservation Act in a budget-sensitive manner, the Task Force recommends that the full-time chair initiate a process to identify opportunities for greater efficiency in the allocation and execution of preservation responsibilities between the ACHP and the NPS.

In the Task Force's research, several opportunities for cost-saving and redundancy-elimination were identified between the ACHP and NPS. For example, the administration of the Preserve America program could be undertaken by the NPS via the Certified Local Government program, whereas the Federal Preservation Institute could be located within the ACHP in keeping with the ACHP's daily interactions with Federal Preservation Officers. A full-time chair will be able to address issues such as these which the part-time nature of the position until now has rarely permitted.

The Task Force recommends that consideration be given to initially pursuing a full-time ACHP chairmanship through an administrative action by the President under Section 5317 of Title 5 of the US Code authorizing the President to create Executive Level IV and V positions "when he considers that action necessary to reflect changes in organization, management responsibilities, or workload in the Executive Agency." This approach would allow the appointment of a full-time Chairman in the immediate future and without amendment to the NHPA.

After an evaluation period, the full-time chair if successful, could then be established statutorily in a legislative amendment to the National Historic Preservation Act. The amendment would be simple and of a largely technical nature: it would establish the position as full-time and permanent, subject to appointment by the President and confirmation by the Senate, and set the compensation on the Executive Level Scale. Obtaining the necessary appropriations would be the obligation of the ACHP through the normal appropriation process. The amendment could be introduced as stand-alone legislation, with the likelihood that congressional action would come as part of a larger legislative package.

4. Designate a senior staff position for cultural and historic resources on the President's Council on Environmental Quality.

The National Environmental Policy Act of 1969 (NEPA), which the President's Council on Environmental Quality (CEQ) helps to implement, promotes a national policy designed to protect both the natural environment and to "preserve important historic, cultural, and natural aspects of our national heritage." The fact that NEPA has always included cultural and historic resources has often been overlooked. Natural resource programs have had an Executive Office champion in the CEQ but the agency with comparable responsibilities for the preservation program (the ACHP) is not currently represented in the Executive Office. Having a voice for historic preservation on the CEQ would ensure that historic preservation and the roles it plays in energy savings, sustainability, and cultural resource preservation are part of Council deliberations as intended by NEPA.

A senior officer for cultural and historic resources at CEQ would gain a voice for these areas of concern within the Executive Office of the President. This officer would also correct the lack of coordination between natural, cultural and historic resources present since the groundbreaking environmental and historic preservation legislation of the late 1960s. The position could be accomplished at minimal cost and without legislation as the CEQ Chairperson "may employ such officers and employees as may be necessary to carry out [the Council's] functions under this Act."

We have no doubt that on the front lines there are talented professionals. But, like a plant, these individuals need the roots to support the bureaucratic structure.

- NPC Discussion Session



APPENDIX A:

Task Force Members and Staff

CO-CHAIRS

David Morgan

Board Member, Preservation Action; Former Kentucky State Historic Preservation Officer and Vice-Chair, Preserve America Expert Panel

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Past-Chair, National Alliance of Preservation Commissions and Deputy Commissioner, Historic Preservation Division, Dept. of Zoning and Land Use Planning, City of Chicago

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Thomas Moriarty
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Principal, The Eisen Group

Ellen Moyer
Former Mayor of Annapolis, Maryland and Member, Preserve America Expert Panel

Loretta Neumann
President, Takoma Theatre Conservancy and Former Board Member, Preservation Action

Ruth Pierpont
Chair, National Conference of State Historic Preservation Officers and Deputy NY State
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Allen Sachse
Board Member, Alliance of National Heritage Areas and Executive Director, Delaware and Lehigh National Heritage Corridor

Nancy Schamu
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Katherine Slick
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A. Roy Smith
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Lola Spradley
Board Member, Preservation Action

Will Tippens
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Jeanne Ward
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President, Applied Archaeology and History Associates

Shanon Shea Peterson
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Bradford J. White
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We would also like to acknowledge the efforts of staff of both the Advisory Council on Historic Preservation and the National Park Service who attended many of our meetings and provided valuable insight and observations.

APPENDIX B:
Subject Matter Expert and Stakeholder Interviewees

Brenda Barrett, Director of Recreation and Conservation, Pennsylvania

Janine Bowechop, Tribal Historic Preservation Officer, Makah Tribe, and Executive Director, Makah Cultural and Research Center

Peg Breen, President, New York Landmarks Conservancy

Allyson Brookes, State Historic Preservation Officer, Washington

August R. Carlino, President, Steel Industry Heritage Corp. and Rivers of Steel National Heritage Area; Board Member, Alliance of National Heritage Areas

Pratt Cassity, Director, Community Design Center, University of Georgia

Linda Dishman, Executive Director, Los Angeles Conservancy

Wayne Donaldson, Chairman, Advisory Council on Historic Preservation; State Historic Preservation Officer, California

Alan Downer, Tribal Historic Preservation Officer, Navajo Nation and Board Member, Preservation Action

John Fowler, Executive Director, Advisory Council on Historic Preservation

Annie C. Harris, Executive Director, Essex National Heritage Area and Board Member, Alliance of National Heritage Areas

Alferdteen B. Harrison, PhD, Director, Margaret Walker Alexander Research Institute, Jackson State University

Eric Hertfelder, Executive Director, Fort Adams Trust; former Executive Director, National Conference of State Historic Preservation Officers

Audie Huber, Intergovernmental Affairs Manager, DNR, Confederated Tribes of the Umatilla Indian Reservation

Russell V. Keune, FAIA, Longtime historic preservation leader at the National Park Service, the National Trust for Historic Preservation and the United States Committee, International Council of Monuments and Sites (US/ICOMOS)

John Leith-Tetrault, President, National Trust Community Investment Corporation; President, Federal Historic Tax Credit Coalition

David Lindsay, Manager of Government Affairs, Society for American Archeology

J. Rodney Little, State Historic Preservation Officer and Director, Division of Historical and Cultural Programs, Maryland

Nellie Longworth, Government Affairs Consultant; Founding President, Preservation Action

Bruce MacDougal, Executive Director, San Antonio Conservation Society; Board Member, Preservation Action

William MacRostie, Principal, MacRostie & Associates; Board Member, Historic Tax Credit Coalition

Bobbie Greene McCarthy, Director, Save America's Treasures, National Trust for Historic Preservation

Marty M. McCune, Chair, National Alliance of Preservation Commissions; Principal, Skylark Consulting, LLC

Elizabeth Merritt, Deputy General Counsel, National Trust for Historic Preservation

Vincent L. Michael, PhD. John H. Bryan Chair in Historic Preservation, The School of the Art Institute of Chicago

Hugh Miller, Former Chief Historical Architect, National Park Service

Mark Mitchell, *Tribal Historic Preservation Officer, Tesuque Pueblo*

David W. Morgan, *Former State Historic Preservation Officer, Kentucky; Vice-Chairman, Preserve America Expert Panel; Co-Chair Federal Historic Preservation Program Task Force*

Ellen Moyer, *Former Mayor of Annapolis, Maryland*

William Murtagh, *First Keeper, National Register of Historic Places, National Park Service*

Joseph K. Oppermann, *Architect*

Theresa Pasqual, *Executive Director, Historic Preservation Office, Pueblo of Acoma; Site Director, Acoma-Sky City, National Trust for Historic Preservation*

Suzi Pengilly, *Deputy State Historic Preservation Officer, Idaho*

Ruth Pierpont, *President, National Committee of State Historic Preservation Officers; Deputy State Historic Preservation Officer, New York*

Constance Ramirez, *Director, Federal Preservation Institute, National Park Service*

Jerry Rogers, *Former Associate Director of Cultural Resources, National Park Service*

Donovan Rypkema, *Principal, PlaceEconomics*

P. Lynn Scarlett, *Former Deputy Secretary and Chief Operating Officer, U.S. Department of the Interior*

Nancy Schamu, *Executive Director, National Conference of State Historic Preservation Officers*

Carol Shull, *Chief, Heritage Education Services, National Park Service; Former Keeper, National Register Historic Places, National Park Service*

Timothy Slavin, *State Historic Preservation Officer, Delaware*

Katherine Slick, *Former Executive Director, US/ICOMOS; Former State Historic Preservation Officer, New Mexico*

Jon C. Smith, *Assistant Associate Director, Heritage Preservation Assistance Programs, National Park Service*

De Teel Patterson Tiller, *Former Deputy Associate Director for Cultural Resources, National Park Service*

Ron Tipton, *Senior Vice-President for Policy, National Parks Conservation Association*

Stephanie Toothman, PhD., *Associate Director for Cultural Resources, National Park Service*

Alicestyne Turley, PhD., *Director, Underground Railroad Research Institute, University of Louisville*

James A. Turner, *Owner, Turner Restoration; Board Member, Preservation Action; Advisor, National Trust for Historic Preservation*

Jay D. Vogt, *State Historic Preservation Officer, South Dakota; immediate past President, National Conference of State Historic Preservation Officers*

Emily Wadhams, *Former Vice-President of Public Policy, National Trust for Historic Preservation*

Shanon Shea Peterson, *Historic Preservation Officer, San Antonio; President, Preservation Action Foundation; Vice Chair, Preservation Action*

Douglas P. Wheeler, *Partner, Hogan and Hartson; Chair, Preserve America Expert Panel*

Bradford J. White, *Citizen Member, Advisory Council for Historic Preservation; Principal, Brad White & Associates*

APPENDIX C:
Subject Matter Expert and Stakeholder Interview Questionnaire

1. How have you been involved with or exposed to the National Park Service's so-called "External Programs" for historic preservation?
2. What does NPS do well within your area of expertise?
3. What does NPS not do well or could do better within your area of expertise?
4. Regarding leadership and policy development in historic preservation, who, if anyone, currently provides this?
5. What is your perspective on the current structure of the "External Programs" within the NPS? Within the Department of the Interior?
 - 5.1. If you have experience with past structures, please tell us more about these
6. Several options for reorganizing or improving the National Historic Preservation function have been proposed in the past. We would like to hear your assessment of these:
 - 1) **Create an independent agency** for all federal preservation activities (separate from the Department of Interior)
 - 2) **Consolidate** all federal preservation programs **into Advisory Council for Historic Preservation (ACHP)**
 - 3) **Create a freestanding bureau within Interior** Department for federal preservation programs
 - 4) **Keep organizational structure the same but create stronger leadership structure** for federal preservation programs: for ex., Full-time ACHP Chairman; Associate Director for Cultural Resources within the Council on Environmental Quality; Associate Director for Historic Preservation within NPS; Oversight Office within DOI
 - 5) **No change:** keep the structure as is
7. What do you think would be the ideal organization for these programs?
8. What do you think, given the current climate, would be a realistic way to organize or improve these programs and their management?
9. In your opinion, what traits are necessary for an improved Federal Historic Preservation Program? Some suggestions include:
 - 1) Supports interagency, tribal, state, local and non-governmental organization engagement and coordination
 - 2) Sustains and increases funding for adequate resource management
 - 3) Encourages innovation and flexibility
 - 4) Increases accountability
 - 5) Dynamic leadership and program visibility

Do you agree with these? Are there other characteristics that you would add?
10. [If applicable]: Within your organization or constituency, how do we go about winning consensus regarding the Task Force's Final Report and Recommendations? What should we be aware of?
11. Do you have any suggestions for how to generate political support for the Task Force's recommendations?
12. Is there anything you would like to add?

APPENDIX D:
Discussion Session Guide

Purpose: *Seek participants' thoughts on strategies for enhancing the effectiveness of the Federal Historic Preservation Program's organizational and leadership structure*

Introduction to the Discussion Session

- introductions and brief history of the issue/problems
- current Task Force: role, assumptions, activities, timeframe
- questions?

Topic #1: Proposals for Improving the Functionality of the Federal Historic Preservation Programs' Leadership/Organizational Structure

Options being considered to enhance effectiveness:

- **Independent Agency:** Create an independent agency for all federal preservation activities (separate from the Department of the Interior)
- **Consolidate into ACHP:** Consolidate all federal preservation programs into Advisory Council for Historic Preservation (ACHP)
- **Freestanding Bureau within Interior:** Create a new bureau within the Department of the Interior for federal preservation programs separate from the National Park Service (NPS)
- **Same Structure with Leadership Adjustments:** Keep organizational structure the same but create stronger leadership structure for federal preservation programs: for ex., Full-time ACHP Chairman; Associate Director for Cultural Resources within the Council on Environmental Quality; Oversight Office within DOI; Associate Director for Historic Preservation within NPS

Key questions: *What are your thoughts on the strengths, weaknesses and feasibility of these options? Are there other options or variations on these the task force should consider?*

Topic #2: Identification of Key Selling Points

Key question: *What are the most compelling arguments for change that should be considered in developing and seeking support for our "proposals for change?"*

Topic #3: Other Issues/Possibilities

Key question: *What other issues/possibilities should the Task Force consider as it seeks consensus and moves into the implementation phase of the effort?*

APPENDIX E: Survey Questionnaire

Background

The organizational structure and effectiveness of the federal government's core historic preservation and heritage programs have been the subject of study for years. These are the programs that support historic preservation and heritage activities at the state, tribal and local levels, such as the National Register of Historic Places, historic tax credits, funding for State and Tribal Historic Preservation Offices, the Certified Local Government program, national heritage areas and other programs.

Most of these programs were created under the National Historic Preservation Act of 1966 and some are funded in part via the Historic Preservation Fund. The management and implementation of these programs is the responsibility of the Department of the Interior, which has delegated them to the National Park Service.

Dubbed "External Programs" by the NPS, these programs have been neglected as evidenced by budget cuts, key management posts being left unfilled for months or years, the shifting of staff and resources to other programs, a lack of coordination with other federal initiatives and a general lack of visibility.

The mission of the Federal Historic Preservation Program Task Force is to document the condition and trajectory of the External Programs; to arrive at a consensus plan for structural improvement of these programs; and, finally, to engage with our partners in an advocacy campaign for implementation of this plan.

In an effort to gain consensus and to build on the important work of the past (in particular, that of the Preserve America Expert Panel, which conducted a similar survey in 2008), the Federal Historic Preservation Program Task Force would appreciate your input.

Occupation

1. We would like to better understand different perspectives on the federal historic preservation and heritage programs and their administration. Please select a category below that best describes your role:

- Educator or student
- Preservation professional service provider (i.e. architect, archeologist, etc.)
- Owner/Developer of an historic property
- Private/non-profit preservation organization staff or volunteer
- Local government staff, commission member or elected official
- State government staff, review board member or elected official
- THPO or other Tribal or Native American staff, review board member or elected official
- Federal agency staff
- Heritage area staff or commission member
- Interested Individual
- Other: please describe below

If you chose "Other" above, please describe your involvement in historic preservation and/or heritage:

Criteria

The Task Force proposes 5 key criteria of effective federal preservation program management.

Effective program leadership is leadership that possesses the standing, authority and wherewithal to:

1. Be accountable for the performance of the federal component of the national historic preservation program and for the effectiveness of the entire national preservation partnership (as implemented by all partners including tribes, states, local governments and citizens).
2. Enable collaboration and partnership with other federal agencies, with state and local governments, Indian tribes and native organizations, and with organizations and individuals undertaking preservation by private means.
3. Advocate successfully for the national historic preservation program across the federal government, particularly advocacy that sustains and increases investment in historic preservation and funding for national, state, local, and tribal partnership programs.
4. Achieve innovation and flexibility while setting national standards that remain true to the purposes of the National Historic Preservation Act of 1966.
5. Make historic preservation and the External Programs visible to the public and at all levels of government, including within the program's home agency and across the federal government.

2. In your opinion, how well do these 5 criteria describe effective leadership objectives for the federal preservation program?

- very poorly
- poorly
- neutral
- well
- very well

If you would like to add anything, please do so:

Program Administration

Below is a chart of the current organizational structure of the External Programs for historic preservation and heritage (please note that the chart might not appear immediately):



3. How well does the existing structure of the External Programs meet the following leadership objectives?

	very poorly	poorly	neutral	well	very well
Is accountable for performance of national preservation program	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enables collaboration across all preservation constituencies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Advocates for the national preservation program, particularly in regard to funding	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achieves innovation and flexibility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Makes historic preservation visible at all levels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you would like to add anything, please do so.

Organizational Options

Many ideas for organizing the federal historic preservation program have been proposed over the past four decades. In the next several questions we would like your input on several of these options. Please rate the individual options on their merit rather than on their feasibility, which will be considered separately.

Using the 5 criteria listed below on the left, please rate the following organizational option's ability to achieve these objectives.

4. Create a new agency for historic preservation and heritage and centralize all historic preservation and cultural heritage programs in this agency, including the Advisory Council on Historic Preservation (ACHP). (Examples of similar agencies include the National Endowment for the Humanities and the National Endowment for the Arts.)

	very unhelpful	not helpful	neutral	helpful	very helpful
Is accountable for performance of national preservation program	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enables collaboration across all preservation constituencies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Advocates for the national preservation program, particularly in regard to funding	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achieves innovation and flexibility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Makes historic preservation visible at all levels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Organizational Options

Using the 5 criteria listed below on the left, please rate the following organizational option's ability to achieve these objectives.

5. Consolidate all External Programs for historic and cultural preservation currently administered by the National Park Service into the Advisory Council on Historic Preservation (ACHP). (The ACHP serves as the primary federal policy advisor to the President and Congress; recommends administrative and legislative improvements for protecting our nation's heritage; advocates full consideration of historic values in federal decisionmaking; and reviews federal programs and policies to promote effectiveness, coordination, and consistency with national preservation policies.)

	very unhelpful	not helpful	neutral	helpful	very helpful
Is accountable for performance of national preservation program	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enables collaboration across all preservation constituencies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Advocates for the national preservation program, particularly in regard to funding	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achieves innovation and flexibility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Makes historic preservation visible at all levels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Organizational Options

Using the 5 criteria listed below on the left, please rate the following organizational option's ability to achieve these objectives.

6. Make the Chairman of the Advisory Council on Historic Preservation (ACHP), which is currently a part-time position appointed by the President, a full-time position appointed by the President with the advice and consent of the Senate.

	very unhelpful	not helpful	neutral	helpful	very helpful
Is accountable for performance of national preservation program	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enables collaboration across all preservation constituencies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Advocates for the national preservation program, particularly in regard to funding	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achieves innovation and flexibility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Makes historic preservation visible at all levels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Organizational Options

Using the 5 criteria listed below on the left, please rate the following organizational option's ability to achieve these objectives.

7. Create a separate bureau within the Department of the Interior (DOI) to manage and coordinate all of the external historic preservation and heritage programs currently housed in the National Park Service. (Examples of other bureaus within DOI are the U.S. Geological Survey, the Bureau of Land Management and the National Park Service.)

	very unhelpful	not helpful	neutral	helpful	very helpful
Is accountable for performance of national preservation program	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enables collaboration across all preservation constituencies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Advocates for the national preservation program, particularly in regard to funding	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achieves innovation and flexibility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Makes historic preservation visible at all levels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

8. If a separate bureau within the Department of the Interior is formed to house the preservation programs, it should (choose one):

- include the Advisory Council on Historic Preservation
- NOT include the Advisory Council on Historic Preservation

Organizational Options

Using the 5 criteria listed below on the left, please rate the following organizational option's ability to achieve these objectives.

9. Create a higher-level division within the National Park Service to manage and coordinate ONLY external historic preservation and heritage programs. (The head of this division could report directly to the NPS director and would not have competing park cultural resource management priorities, for example.)

	very unhelpful	not helpful	neutral	helpful	very helpful
Is accountable for performance of national preservation program	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enables collaboration across all preservation constituencies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Advocates for the national preservation program, particularly in regard to funding	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achieves innovation and flexibility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Makes historic preservation visible at all levels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Organizational Options

Using the 5 criteria listed below on the left, please rate the following organizational option's ability to achieve these objectives.

10. Keep the organizational structure the same but elevate preservation leadership: for example, create posts dedicated to preservation and heritage within the White House and the Office of the Secretary of the Department of the Interior.

	very unhelpful	not helpful	neutral	helpful	very helpful
Is accountable for performance of national preservation program	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enables collaboration across all preservation constituencies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Advocates for the national preservation program, particularly in regard to funding	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achieves innovation and flexibility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Makes historic preservation visible at all levels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Organizational Options

11. Please rank the organizational options in your order of preference. Rank the options on their individual merit: political, fiscal and other factors affecting feasibility will be considered in the next question.

A. Create an independent agency for historic preservation and heritage.

B. Consolidate all programs into the Advisory Council on Historic Preservation (ACHP).

C. Make the Chairman of the ACHP a full-time position appointed by the President with the advice and consent of the Senate.

D. Create a separate bureau within the Department of the Interior (DOI).

E. Create a higher-level division within the National Park Service (NPS) to house the External Programs for historic preservation and heritage.

F. Keep the structure the same but elevate preservation leadership: for ex., create heritage posts in the White House and/or the Office of the Secretary of the Department of the Interior (DOI).

G. No change

	1st choice	2nd choice	3rd choice	4th choice	5th choice	6th choice	7th choice
Independent Agency	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consolidate into ACHP	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Full-time ACHP Chairman	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Separate Bureau within DOI	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Higher-level Division within NPS	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Elevate Preservation Leadership at White House and/or DOI	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
No Change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Organizational Options

12. A number of those interviewed by the Task Force expressed support for the concept of major structural changes in the system, but suggested that more limited and more targeted changes should be considered in light of the current political and fiscal climate. Taking the current climate into account, please rank the organizational options in your order of preference.

	1st choice	2nd choice	3rd choice	4th choice	5th choice	6th choice	7th choice
Independent Agency	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consolidate into ACHP	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Full-time ACHP Chairman	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Separate Bureau within DOI	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Higher-level Division within NPS	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Elevate Preservation Leadership at White House and/or DOI	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
No Change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Implementation

13. What other issues or possibilities should the Task Force consider as it seeks consensus on any proposals for change?

14. Do you have any suggestions for how to generate grassroots and/or political support for the Task Force's recommendations?

15. Would you like to assist the Task Force in its efforts to improve the federal historic preservation program? If so, please provide your email address below.

Thank you very much for your input!

Please visit preservationaction.org to learn more about the Federal Historic Preservation Program Task Force and its activities.

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The famous (one if by land, two if by sea) Old North Church in Boston, MA. by Ben Franske, used under the Creative Commons Attribution-Share Alike 3.0 Unported, 2.5 Generic, 2.0 Generic and 1.0 Generic license, obtained via the Wikimedia Commons, a freely licensed media file repository. (Recipient of a Save America's Treasures Grant.)

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A street in Annapolis, Maryland, by Dan Smith, used under the Creative Commons Attribution-Share Alike 2.5 Generic license, obtained via Wikimedia Commons, a freely licensed media file repository. (National Register Historic District.)

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Looking down Filbert Street in North Beach, San Francisco, by Daniel Schwen, used under the Creative Commons Attribution-Share Alike 2.5 Generic license, obtained via the Wikimedia Commons, a freely licensed media file company.

A street in Annapolis, Maryland, by Dan Smith, used under the Creative Commons Attribution-Share Alike 2.5 Generic license, obtained via Wikimedia Commons, a freely licensed media file repository. (National Register Historic District.)

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The Task Force held a series of Listening Sessions in Philadelphia, PA, Austin, TX and Salem, MA. Photos courtesy of Preservation Action.