



8013 Bellona Ave, Riderwood, MD 21204 410-832-1812 www.preservationabc.org

To: Advisory Council on Historic Preservation Members:

October, 8th, 2024

Preservation Alliance of Baltimore County is Baltimore County's (Preservation Alliance) (previously known as the Baltimore County Historical Trust) non-profit organization, established in the 1970s & incorporated in 1981, dedicated to preserving our county's historic buildings, sites, communities, & landscapes.

As a consulting party to Maryland State & federally funded projects in Baltimore County, we are very troubled with the propose Program Comment on Accessible, Climate-Resilient, and Connected Communities. Not only are historic buildings already the greenest buildings that exist, but historic preservation is one of the hardest sells in America. We need historic preservation organizations & agencies to stand up for their purported missions & stand-up for preservation first, not water-down, & even further gut, the already too few protections for our irreplaceable historic buildings. Preservation Alliance therefore concurs with The National Conference of State Historic Preservation Officers' (NCSHPO) statement that the " proposed Program Comment should seek to harmonize, not subvert historic preservation, with other policy goals."

Preservation Alliance also concurs with NCSHPO's observations that "the proposed changes would be confusing, & potentially detrimental in that the proposed Program Comment conflicts with local preservation ordinances and will frustrate project reviews, ...as well as with the Secretary of the Interior's Standards for rehabilitation tax credit programs." Not only are these potential changes challenging in themselves, national standards often serve as a role model as to how other preservation agencies & organizations create their preservation rules & regulations; potentially causing these local entities to water-down their own preservation standards, & justifying doing so due the potentially new Advisory Counsel guidelines.

Also problematic is that, under the proposed regulations, many historic buildings would lose their status & protections. The potential that newer historic buildings, those built between 1928-1978, would be automatically approved, without review or comment, for replacement windows & doors is not acceptable. This is especially troubling for pre-1950 buildings, which most often have architecturally & aesthetically significant, along with efficient & quality built, original windows & doors.

Omitting historic buildings that are not officially deemed as "historic" by governmental agencies is equally troubling. Unfortunately, many times historic buildings are not officially deemed "historic" by agencies for political reasons, especially from governmental & developer pressure. So these buildings would fall through the cracks a second time with this potential policy.

Your agency's attitude towards Interiors & "non-primary" exteriors is concerning, as historic buildings should be viewed as a whole, & all components are integral & important. Most people spend far more time inside buildings, than admiring them from the outside; not safeguarding historic interiors strips them of their soul & character. The integrity of historic buildings needs to be valued as a whole, not in parts; as kitsch & facadism.

Environmental protection is not about making more stuff, it is about protecting far more & consuming much less. To have an historic preservation agency advocating for the destruction of historic windows is very troubling, on the levels of historic integrity, & environmental protection. The most efficient windows are historic ones with either wooden storms or interior storms. Most new windows only last 10-25 years, while historic windows can last 100-200 years, or more (please see New Hampshire Preservation Alliance's excellent analysis on historic windows

<https://www.nhpreservation.org/blog/why-preserving-your-old-wood-windows-is-an-energy-efficient-choice#:~:text=Wood%20windows%20are%20designed%20to,the%20need%20for%20full%20replaceme nt.>) Besides authenticity, destroying historic windows is horrible for the environment, as it adds to landfills, takes resources out of the environment to make news ones (greatly exasperating biodiversity loss) & spews more carbon in the production process, thereby escalating our climate crisis, * negating any potentially benefits.

We, at Preservation Alliance also support & concur with all the commentary by, & concerns of, the NCSHPO, along with those of the individual State Historic Preservation organizations, as attached to the NCSHPO commentary to the Advisory Council.

To reiterate, Historic Preservation should be viewed & appreciated as an important endeavor & end unto itself, not just a vehicle, as important as they may be, for other enterprises. It is the duty of all historic preservation agencies & organizations to uphold the significance of historic preservation, & its primary status in our landscape, & inherent role in environmental protection.

Sincerely,

Anne Gryczon,

Executive Director