

A 21st Century Investigation of Function

Recent criticism of the Standards results in a seemingly irreconcilable paradox...how do we meet the desire for both consistency and flexibility?



NATIONAL CONFERENCE
OF STATE HISTORIC
PRESERVATION OFFICERS

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Buckingham Industrial School Barn HTC project (Adamstown, MD)
Photo courtesy of Maryland Historical Trust

Our nation is composed of irreplaceable historic and cultural resources that ground generations in history, tradition, and community. Historic preservation rarely conforms to a one size fits all solution – rather, it is comprised of various policies and programs at the federal, state, and local level, in service of retaining a deep connection to our collective past.

Often a balancing act, historic preservation seeks to integrate our historic built environment, and landscapes into future planning efforts. One aspect of the federal historic preservation program that has faced increasing scrutiny in recent years is the [Secretary of the Interior's Standards for Rehabilitation](#) which are regulatory for the review of historic rehabilitation projects seeking to utilize the federal

[Historic Preservation Tax Incentives program](#), but are considered variably regulatory or foundational guidance for federal, state and local preservation efforts nationwide. Essentially, the rehabilitation treatment standard is used to determine if the proposed project is a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.

National Dialogue on the Standards

In response to national conversations about whether the Standards are still functioning appropriately, the National Conference of State Historic Preservation Officers (NCSHPO) established a working group to investigate. As a membership organization representing all 59 state historic preservation offices, NCSHPO is uniquely positioned to utilize the collective knowledge and experience of these offices – which the federal government entrusted to speak on behalf of their states to incorporate state and local values into [federal decision making](#). This undertaking empowered the NCSHPO membership as well as key stakeholders to weigh in on this national conversation. Relying on the collective expertise of historic preservation professionals, the working group coordinated a Research committee to collect known scholarship on the history of the Standards, a colleague engagement subcommittee to solicit feedback internally from state SHPO office staff and Certified Local Government (CLG) commissions (as well as a THPO perspective through the National Association of Tribal Historic Preservation Officers), and a Stakeholder subcommittee which solicited key external stakeholders such as architects, developers, and consultants.

“ Criticism of the Standards has surfaced that suggests that application of the Standards has become less predictable, consistent, and flexible in recent years, challenging successful rehabilitation efforts utilizing the federal historic tax credit – and resulting in [project delays](#). But contained in this criticism is a seemingly irreconcilable paradox – how do we meet the desire for both consistency and flexibility?

A central idea explored via a series of surveys was whether the perceived issue was with the Standards themselves, or whether it was their interpretation that is the root cause of any complaints. Our investigation revealed that 62% of SHPO survey respondents indicated they did not take issue with the Standards themselves, along with 60% of CLGs, and 64% of other stakeholders who responded to the surveys. The majority of respondents further indicated that use of the Standards contributes to positive preservation outcomes (SHPOs = 81%, CLGs = 62%, stakeholders = 68%). However, the majority of participating stakeholders (58%) do take issue with the interpretation of the Standards, even if they do not take issue with the Standards themselves. Interestingly, 39% of responding SHPO staff felt that the interpretation of the Standards has become somewhat more flexible within their organizations.

One thing also became clear– that by and large, preservationists (whether stakeholders or reviewers) are not only concerned with historic preservation, but also how it aligns with an ever-evolving landscape of policy goals. Those surveyed underscore the need for updated & new guidance which includes assessment of character-defining features, making properties accessible, more resilient to natural disasters, and how to evaluate technical and economic feasibility– indicating a need for case studies, additional guidance, clear do’s and don’ts, short videos, and on demand or online training. There also seemed to be a clearly expressed desire for more voices to be heard in the development of these resources.

When asked if the federal historic tax credit program was adequately incentivizing historic preservation, nearly half felt that rehabilitation incentives or public funding were not sufficient to offset the additional costs to meet the Standards in most cases. Coupled with misinformation that still surrounds the practice and requirements of historic preservation, there is also a feeling of confusion by the general public.

Through analyzing survey responses, several specific recommendations were conveyed including ways to

further discussion on the efficacy of the Standards. Regular evaluation of the Standards, as well as updated guidance and additional training have all been advised– especially in light of catastrophic destruction from hurricanes and wildfires, a need to increase affordable housing, and the needs of infrastructure projects. There is also interest in further understanding the effectiveness of the current dual historic tax credit review process between SHPOs and the NPS.

Overall, the Standards as written, appear poised to stand the test of time and continue to have a positive influence on retaining our nations historic assets. However, improvements to their interpretation, regular examination and dialogue, and the availability of relevantly updated guidance may hold the key to improving future evaluation outcomes.

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