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## Preserving Lighthouses Historic Lighthouse Inventory

## **Candace** Clifford

ighthouses are romantic reminders of our country's maritime heritage. Protecting vessels from dangerous headlands, shoals, bars, and reefs, these structures played a vital role in supporting this nation's maritime transportation and commerce industries. Sixteen lighthouses were already in place when the United States formed and lighthouses were one of the new government's first priorities. Subsequently, hundreds more lighthouses have been built along our sea coasts and on the Great Lakes creating the world's largest and most complex system. No other national lighthouse system in the world compares with the United States in size and diversity in architectural and engineering types.

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Cultural Resources Management Information for Parks, Federal Agencies, Indian Tribes, States, Local Governments and the Private Sector



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**Issues Paper: Conservation Districts** 

Cover photos from top: Drum Point Light, Calvert Marine Museum, Solomons, MD, NPS photo, 1991; Port San Juan Light, San Juan Harbor, PR, U.S. Coast Guard photo; West Quoddy Head Light, Bay of Fundy, near Lubec, ME, U.S. Coast Guard photo.

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## Historic Lighthouse Inventory

(continued from page 1)

Lighthouses were actually complexes of mutually-supporting structures that formed each lighthouse station. The light required oil and maintenance that could only be provided by keepers. Keepers, in turn, required housing and transportation; hence, a station might include an oil house, a keepers dwelling, a cistern, or a boathouse, in addition to the tower. If a fog signal was required, a separate structure might be built to house it as well.

Technological changes in the 20th century ultimately doomed the manned lighthouse station. Today, all but one light station is automated, eliminating the need for a keeper to maintain the light and its associated structures. Modern aids to navigation are more often placed on steel poles or on navigational buoys rather than inside the lantern of a traditional lighthouse. As the U.S. Coast Guard and other caretakers look for new uses for the

obsolete towers, the issues surrounding lighthouse preservation have become more critical. The popular appeal of lighthouses has created a tremendous body of support for their preservation, especially at the

local level. State and national groups have also organized to promote the cause of lighthouse preservation.

The National Maritime Initiative, a program within the History Division of the National Park Service (NPS), is responsible for the survey and evaluation of historic maritime resources preserved around the country. Inventories for three types of maritime resources are currently maintained by the Initiative: large vessels, lighthouses, and shipwrecks and hulks. In addition, an inventory of small craft has been developed in cooperation with the Museum Small Craft Association.

Initially, the Initiative's survey efforts focused on large preserved vessels, resulting in the NPS publication, 1990 Inventory of Large Preserved Historic Vessels, and the popu-



St. Georges Reef Light, near Crescent City, CA. Official U.S. Coast Guard photo, 1967.



Diamond Head Light, Honolulu, HI. NPS photo, 1991.

lar publication, *Great American Ships*, published through the National Trust for Historic Preservation's Preservation Press in 1991. The inventory of large vessels was produced in tandem with the large vessel phase of the

The popular appeal of lighthouses has created a tremendous body of support for their preservation, especially at the local level.

National Historic Landmark (NHL) Theme Study, Maritime Heritage of the United States, now nearing completion with 110 vessels designated and 43 vessels being studied.

While the large preserved vessel inventory continues to be maintained and updated, the focus of the Initiative's survey efforts in the past year has shifted to lighthouses. The lighthouse database is maintained on a personal computer using Dbase III Plus software. Fields within the database provide information on location; ownership; construction dates; the physical characteristics of the historic tower, keepers quarters, and sound signal building; what additional structures remain at the station; and both historic and present-day optics. Also included is information concerning whether the sta-

tion continues in operation as an active aid to navigation, what other functions the station presently serves, whether the station is accessible to the public, National Register and NHL status, and whether the station has been documented by the Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER).



Sand Island Light, near Mobile, AL. Official U.S. Coast Guard photo, 1963.

The information included in the lighthouse inventory was gathered primarily from the National Register of Historic Places, the U.S. Coast Guard Historian's Office, the U.S. Lighthouse Society, State Historic Preservation Offices, and survey forms provided directly to the owners and managers of

(Inventory—continued on page 4)

### (Inventory—continued from page 3)

the individual light stations. As of April 1993, 930 records are included in the database. The main file consists of 508 primary stations, generally coastal lights, with towers 50 years of age and older. Data has also been collected on an additional 192 secondary aids to navigation, generally harbor or river lights with smaller optics or a tower which had no facility to house a keeper. Additional files contain 37 modern stations (built since 1939) and 193 sites of for-



Point WIIson Lighthouse, Port Townsend, WA. NPS photo by Candace Clifford, 1991.

mer stations that no longer have buildings associated with them.

Of the 737 existing lighthouses, 440 support an optic operated by the U.S. Coast

Guard as an active aid to navigation. Many additional stations continue in operation as active aids with the optic placed outside the tower, generally mounted on a steel pole.

Boston Harbor Light is the last station to be manned in the country; all other lights have been automated.

Automation has permitted the Coast Guard to lease many stations to state, local, and private groups for use as museums, parks and recreation areas, research laboratories,



Whitefish Point Light, Shelldrake, MI. NPS photo by James P. Delgado, 1990.

and nature preserves. Finding an adaptive use for those stations in isolated, inaccessible locations has proved more challenging.

Lighthouses in accessible locations have become popular tourist attractions and educational resources. Some lighthouses report visitation in the tens of thousands. Approximately 250 stations are accessible to the public. In some cases a person may enter the tower and climb the stairs to the lantern room; in others only the grounds outside the buildings are open. Thirty-five lighthouse stations fall within boundaries of national parks.

> The Initiative plans to publish the lighthouse inventory in late 1993, highlighting the more than 400 stations listed in the National Register of Historic Places. Currently, the "Preliminary Inventory of Aids to

Navigation," a five-part, 100-page Dbase report, is available from the Initiative by writing the History Division (418), National Park Service, P.O. Box 37127, Washington, DC 20013-7127.

(Inventory-continued on page 7)



Conimicut Shoal Light, Warwick, RI. U.S. Coast Guard photo.



Point Betsie Light, Frankfort, MI.

Lighthouses ... have become popular tourist attrac-

tions and educational resources. Approximately

250 stations are accessible to the public.

## Restoring a Landmark Lighthouse in South Florida

## James H. Ross

he Cape Florida Lighthouse, one of south Florida's oldest structures, has endured through war and peace, use and disuse, reconstruction and hurricanes. Now it is in need of some serious restoration.

The first lighthouse at Cape Florida dates to 1825. Due to poor construction and the harsh environment, the original structure quickly began deteriorating. In 1830 the lightkeeper reported that settling of the tower had resulted in the breakage of window and lantern glass. Then in 1836, the lighthouse and keeper's quarters were destroyed when a band of Seminole Indians attacked. The assistant lighthouse keeper, John Thompson, and an unidentified helper, were trapped in the lighthouse when the Indians set fire to it. The helper was killed, but Thompson survived and was rescued by a passing Navy ship the following day. Due to the continuing threat of Indian attack, efforts to rebuild the lighthouse were abandoned and it remained out of service until 1846.

The structural problems of the original tower were in part explained by discovery that the brick walls were constructed hollow rather than solid as called for in the specifications. This defect, in addition to the Seminole attack of 1836 and the abandonment of the structure for ten years, resulted in the complete rebuilding of the tower in 1846. The new tower was constructed on the foundation of the old. Salvageable bricks were used in the 1846 reconstruction.

Almost as soon as the 1846 lighthouse was put into operation, it became obvious that the light was inefficient due to the distance from Key Biscayne to the outer reefs several miles off shore. Plans were soon underway to improve the efficiency of the Cape Florida light by raising the height of the lens focal point and installing an improved illuminating device in the lantern.

In 1851, the United States Army Corps of Topographical Engineers sent Lieutenant George G. Meade to the Florida Straits to complete the construction of lights south of Cape Florida. The Lighthouse Board assigned him to survey and chart the Florida Reefs as well as assist in the design and construction of several lighthouses for the Delaware River. The knowledge gained off the waters of the Keys and experience of building the iron screw-pile lighthouse in the Delaware River made him an obvious choice to complete the Carysfort Reef Lighthouse located 40 miles south near the present town of Key Largo.

Over the next several years Meade was instrumental in the completion of several lighthouses located south of

> Cape Florida. During this period he designed an improved hydraulic lamp which was soon adopted by the Lighthouse Board for use in American lighthouses. In 1854, Meade was assigned the task of designing the extension of the Cape Florida Lighthouse.

In 1855, the lighthouse was extended upward 30', raising the focal point to its present height of 100' above sea level. A French-made Fresnel lens was added at that time. A sectional drawing prepared by Lieutenant Meade depicts the outline of the original 1846 structure and the 1855 extension project, noting a distance of 100 yards to the Atlantic. The renovated lighthouse was put back into service and operated until the outbreak of the Civil War. George G. Meade went on to become the general in charge of Union forces at Gettysburg.

After the war, the lighthouse remained in service until it was replaced in 1878 by the more strategically located Fowey Rocks Lighthouse, approximately 7 miles southeast of Cape Florida. Soon the Cape Florida light was extinguished and abandoned by the government.

Over the next 90 years the lighthouse deteriorated due to vandalism and lack of maintenance in the extremely harsh coastal environment. A series of private individuals leased or owned the property largely for sentimental reasons. Each expressed interest in preserving the structure, although little was done until ownership by James Deering between the years of 1915-49.

One important accomplishment during the Deering ownership was the protective measures taken to stabilize the tower foundation during the 1920s. A hurricane hit the south Florida area causing severe erosion of the Key Biscayne coastline. The original out buildings, including the lightkeeper's quarters, were washed away. The tower was saved due to its massive weight and the construction of jetties and concrete reinforcement at the base. The Atlantic was then only 10 yards from the tower.

(Lighthouse-continued on page 6)



AutoCAD drawing by Dave Jones, project engineer.

## (Lighthouse-continued from page 5)

The original ironwork was mostly left to the elements during this long period of private ownership. It became so unsafe that the ground level door and window were sealed to prevent access.

In 1966, the southern tip of Key Biscayne became Bill Baggs Cape Florida State Recreation Area. This 400-plusacre acquisition included the lighthouse as a feature attraction and primary reason for inclusion within the state park system. In 1968, the state park service undertook a lighthouse renovation project. Due to the nature of the work without adequate historical research, this project is viewed as a step backward in the present attempt



Cape Florida Lighthouse. Photo by the author.

to restore the structure to the original George G. Meade design of 1855. This earlier effort was considered a means to render it safe and make it accessible to the public.

The lighthouse was in ruinous condition prior to the 1968 project. The brick work had continued to deteriorate and the lower portion of the iron stairway was completely missing. The original cast-iron spiral stairs, iron watchroom and lantern top were replaced with fabricated steel with little attention to historic detail. In addition to the severe weathering, the brick had been exposed to vandalism by removal of some exterior brick and by being covered with graffiti inside and out. This graffiti was removed by sandblasting, an abrasive process which removed the glazed finish of the historic brick. This treatment failed to meet contemporary preservation standards in several areas, altering the historic appearance of the brick and exposing it to accelerated weathering. This treatment ignored the fact that the tower had been historically white-washed to make it highly visible as an aid to navigation and also to protect the structural quality of the brick.

Although the 1968 project enabled public access for over 20 years, it became apparent the painted steel and exposed masonry would require new efforts if the structure were to be preserved. During the late 1980s, a new effort of historical research began that would lead to renewed interest in restoring the lighthouse to a period when it was operated as an aid to navigation (1855-78).

Over the last few years historic preservation consultants have researched and documented the history of this structure. Out of that effort and renewed interest of local organizations, a plan of action began to evolve by early 1991 which, when completed, will result in the restoration of the lighthouse to the early Meade modifications of 1855.

Latest cost estimates for total restoration have exceeded one million dollars. "With only about a quarter of what's needed having been raised so far, we have a long way to go," says Fran Mainella, Director of the Division of Recreation and Parks. The Florida Department of State, Division of Historical Resources has provided technical guidance as well as some funding through state grants. Restoration is going to rely heavily on such organizations as Dade Heritage Trust, a private group dedicated to the task, who has been leading the way by sponsoring grant programs, soliciting donations and organizing fund-raising events in the last two years. One local effort was establishment of a lighthouse tour patio site containing a display area of bricks with the names of those who donated \$100 or more toward restoration.

"We hope that with the help of dedicated organizations such as Dade Heritage Trust, the majority of the money can be raised privately and be supplemented by state and federal funds. We hope to find others who have a special interest in lighthouses or in Cape Florida," Mainella said.

One particular challenge has been the detailed design required to completely rebuild the cast-iron works of this 137-year-old structure. The task has been assigned to Mr. Dave Jones, a structural engineer with the Bureau of Design and Construction. Jones, who has been busy for months converting the original Meade archive drawings to computer-aided format, says, "What makes this project so challenging is trying to piece together partial archive drawings with historic castings recovered from a burial pit at the park and with physical evidence left in the tower." Due to the extensive deterioration of the 1855 metal work, all but the center column was replaced with steel elements in the 1968 project. Many of the cast-iron pieces were found in good enough condition to verify the archive drawings or to indicate changes apparently made during fabrication, construction, or subsequently to improve design. "One advantage we have in this restoration project is that we are replacing the entire iron components, including the original center column and bearing pad. While we are making every effort to be historically accurate with original drawings, photographs, physical research and typical craftsmanship of that era, our only extant constraint is the masonry envelope into which we are placing the new metalwork."

The new stairwell design has been changed to reflect the design specifications of 1846 so that, with the exception of the lantern itself, there is no interface of the stair metalwork and the masonry shell from the tower's base to the deck of the watchroom. "We have tried to represent the intended specification while keeping in mind the public role and current standards imposed on this type of facility. The end result we hope will be an interpretation experience of the authentic with subtle modifications that improve safety and serviceability by today's standards."

Although the project is well on its way with Phase I and replacement of the spiral stairway, there remains the critical need to complete the remaining phases of metal work and masonry restoration. Due to limited funds and the physical constraints of this type of restoration, the project is forced into phased construction. That means additional effort and expense to create design schemes and modify elements to allow smaller scopes of work and subsequent interfacing of phased steps.<sup>1</sup>

As a final effort, replacement of the original 2nd order Fresnel lens and expected reactivation by the U.S. Coast Guard will return the Cape Florida Lighthouse to its former glory as an aid to navigation and a true "landmark light" for south Florida.

<sup>1</sup> Since this article was written, the Florida Department of Natural Resources has entered into a contract with a metalwork foundry in Talladega, AL, to fabricate the stairs and center column to 1855 specifications.

James H. Ross is a planning manager at the Bureau of Design and Construction, Division of Recreation and Parks, Florida Department of Natural Resources. He coordinated research efforts and assisted with the design of the Phase I restoration project.

## (Inventory—continued from page 4)

In addition to providing an overall survey of light stations, the Inventory will serve as a starting point for researching and selecting candidates for study as part of the lighthouse phase of the NHL theme study, Maritime Heritage of the United States. Currently only three lighthouses are designated NHLs: Boston Harbor Light on Little Brewster Island in Massachusetts, Sandy Point Light on lower New York Bay in New Jersey, and Old Cape Henry Light at the entrance to Chesapeake Bay in Virginia. After a context study is completed on the development of the architecture and engineering of lighthouses within the U.S. lighthouse system, the Initiative hopes to select approximately 50 of the most nationally-significant lighthouses for study as potential NHLs. For each property, the Initiative will gather information on its history, significance, appearance, and integrity; make an onsite inspection; and prepare a formal nomination to be presented to the National Park System Advisory Board, which in turn makes recommendations to the Secretary of the Interior. Once designated as NHLs, these lighthouses will hopefully receive additional recognition and protection as the most treasured symbols of our maritime past.

Candace Clifford is a consultant now living in Williamsburg, VA. She was formerly associated with the National Maritime Initiative in the History Division of the National Park Service.

## For Further Information on Lighthouses

U.S. Lighthouse Society 244 Kearny Street - 5th Floor San Francisco, CA 94108 415-362-725

Great Lakes Lighthouse Keepers Association P.O. Box 580 Allen Park, MI 48101

Lighthouse Preservation Society P.O. Box 736 Rockport, MA 01966

U.S. Coast Guard Historian's Office G-CP/H 2100 2nd Street, SW Washington, DC 20593

Record Group 26 National Archives Washington, DC 20408 USLS provides its members with Keepers Log, an illustrated quarterly journal, lighthouse tours, and a general information service on lighthouse and lightship preservation.

GLLKA provides its members with a quarterly journal and hosts an annual meeting.

LPS is largely an advocacy group but does occasionally sponsor lighthouse conferences.

The Coast Guard History Office maintains operational records and historical materials relating to the U.S. Coast Guard and its predecessor agencies.

Record Group 26 includes records of the Bureau of Lighthouses and it predecessors, 1789-1939; U.S. Coast Guard records from 1828 to 1947; as well as cartographic and audiovisual materials from 1855 to 1963.

For those desiring a general guidebook/reference on lighthouses in the United States, *Great American Lighthouses* by Ross Holland is available from the Preservation Press. To order, call 202-673-4200 or write The Preservation Press, National Trust for Historic Preservation, 1785 Massachusetts Ave., NW, Washington, DC 20036.

## Wolf Ridge After Pearl Harbor Waiting for the Enemy Who Never Came

## Stephen A. Haller

n a recent article, "Early Warnings: The Mystery of Radar in Hawaii" (*CRM*, Vol. 15, No. 8), historian Harry A. Butowsky discussed how the events of December 7, 1941, at the Opana Radar Site reflected both the value of technology in modern warfare and the challenge of effectively applying it. This article reminds us of the importance of preserving other material remains from this era of our history and of the educational value of these resources.

On an isolated ridgetop in the Marin Headlands of Golden Gate National Recreation Area are the remains of an antiaircraft battery that was once a part of the Harbor Defenses of San Francisco. This site, Antiaircraft Battery No. 1, is the finest surviving example of an antiaircraft artillery emplacement of the World War II era in the system of seacoast defenses that protected the San Francisco Bay Area. It is the prime potential exhibit for interpreting the subject of antiaircraft defense in the park and illustrates America's response to the attack on Pearl Harbor. The extensive fortification system at Golden Gate comprises one of the most heavily-fortified areas in the United States and constitutes one of the best and most extensive museums of military architecture to be found in North America.

Since Golden Gate NRA is among the most heavily-visited parks in the national park system, these fortifications provide a unique opportunity to interpret the impact of World War II in the United States. The history of this particular battery, and its documentation, preservation, and use in education is the subject of this article.

Antiaircraft Battery No. 1 was constructed high on a bare knob of Wolf Ridge to command the skies over Fort Cronkhite, an Army post built to house the troops of the



Wolf Ridge. Photo by Dewey Livingston, 1992.

rapidly-mobilizing Army assigned to man the harbor defenses to the north of San Francisco.

As early as 1916, before the country's entry into World War I, plans had been made for three two-gun batteries of antiaircraft guns to be permanently emplaced to protect the harbor defenses of San Francisco Bay. By 1925, such batteries had been constructed at Forts Funston, Miley and Winfield Scott, south of the Golden Gate, and at Fort Barry to the north.

As the nation began to plan for rearmament in the face of the threats to peace, plans were prepared, which envisioned five three-gun batteries. These batteries consisted of permanent mounting pads for 3-inch Antiaircraft Gun Model M1917 A1M2 on Fixed Mount M1917M2. The battery at Fort Cronkhite was designated Antiaircraft Battery No.1 and consisted of a combined storeroom/powerplant structure and a magazine, both dug in near the guns and made of heavy reinforced concrete construction. Construction of permanent seacoast fortifications was designed and carried out by the Corps of Engineers through the U.S. Engineer Office, San Francisco. The mission of Antiaircraft Battery No. 1 was to fire at any enemy aircraft within range and thus protect the two huge 16-inch casemated rifles at nearby Battery Townsley which covered the sealanes approaching the Golden Gate from the north. In the tense and uncertain atmosphere that existed for months following the Japanese air raid on Pearl Harbor this mission was no longer theoretical, and carrying it out was perceived to pose a constant threat for the men who manned the guns.

In 1942, many Americans believed it was theoretically possible for the Japanese to launch a massive air raid on San Francisco. In fact the Japanese did follow their successful surprise attack on Hawaii by sending their naval striking force eastward to the Indies and the Bay of Bengal, thereby demonstrating the long reach of the Japanese Navy.

This perceived threat required round-the-clock watches and caused the Army to construct additional temporary facilities, including a buried quonset hut, bombproofed by a two-foot thick overhead layer of concrete, that was emplaced and in use by March 12, 1942. Additional temporary structures included a mess hall/day room, a battery office, an ante-room to the buried quonset hut, and machine gun pits for close-in defense.



Wolf Ridge, interior quarters, 1942. U.S. Army photo courtesy Golden Gate NRA.

By 1945, four 40-mm automatic cannon and four .50 caliber machine guns supplemented the battery's defensive fire. The three-inch guns and their associated fire control equipment remained in place until after November 1945, although they had been rendered completely obsolete by more powerful weapons used on overseas battle fronts during the war.

Prior to November 1945, a radar set, SCR-584, replaced the optical height finder and mechanical gun director computer. About 500 feet further up the ridge another radar set, SCR-682 was mounted by July 25, 1944. Its four concrete mounting pylons and concrete mounting pad remain to this day. Additional refinements to the defensive equipment continued after the war. The big guns of the site remained operational until 1956 when the Nike missile system came on line.

Much of the original equipment and facilities for the site have survived, including a height finder and director pits and a series of tunnels that once provided covered access between the structures of the complex. Camouflage techniques at the time generally relied upon overhead netting, which was used to break up the outlines of the buildings and tunnel entrances, while applique stone surfacing and artificial rockwork supplemented concealment efforts as the war progressed. This site contains outstanding examples of these techniques in the rockwork surrounding a generator pad and the applique surfacing on the director pit roof, which was mounted on rollers to be quickly uncovered when needed.

A National Park Service Historic Resource Study, written in 1979, recommended that these resources be preserved and stabilized and made safe for visitors as an example of the prime exhibit for interpreting the history of antiaircraft defenses of San Francisco.

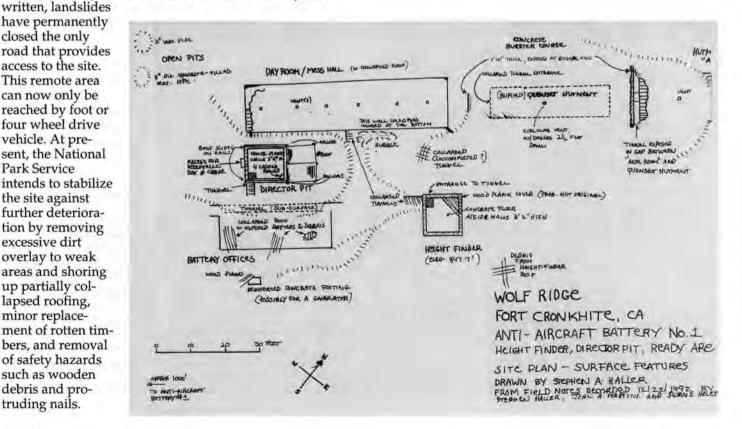
Unfortunately, since the Historic Resource Study was

Recently, park rangers have led special interpretive tours to the site under the intriguing title of "The Lost City of Hill 88."

During the remaining period of the 50th anniversary of World War II, Golden Gate will pursue a "World War II Initiative" with the intent of highlighting the variety of research, preservation and interpretation projects planned or underway that relate to the theme. Besides the recordation and stabilization of Antiaircraft Battery No. 1, these projects include the restoration, furnishing and interpretation (with costumed volunteers) of mobilization barracks at Fort Cronkhite, completion of the National Landmark nomination for the Seacoast Defenses of San Francisco Bay, and a self-guiding brochure on the area's defenses, interviewing veterans who manned those defenses, and further recordation of threatened defense structures. All of these activities will help to preserve and interpret the important resources and story for the visiting public. They remind Americans that while World War II was fought over wide stretches of Europe, Africa, the Pacific, and Asia, the people of San Francisco and many other American cites were also under the threat of military attack from hostile enemy forces.

For further information the reader should consult Seacoast Fortifications of San Francisco Harbor, Golden Gate National Recreation Area, California, by Erwin N. Thompson; Denver Service Center, National Park Service, Denver, CO; 1979.

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## Linear Frontiers

## David M. Gaines

n 1988, the Branch of Long Distance Trails was established in the Southwest Regional Office of the National Park Service (NPS) to help plan and operate the Santa Fe National Historic Trail and the Masau Trail. Excluding the Appalachian Trail Project Office in Harpers Ferry, WV, which is a Washington Office function, our program was then—and still is— only the second regional office long distance trail operation managed with full-time staff. (The Midwest Region's Trail Project Office in Madison, WI was first.) In the future, more regions will establish fully staffed programs in response to an expanding National Trails System and a backlog of needs.

"Long distance trails" is the euphemism for the national scenic and national historic trail components of the National Trails System, but the term can include some non-traditional linear entities like

the congressionally designated Masau Trail auto tour route, which will connect Puebloan sites in New Mexico and Arizona using modern highways; and also Route 66, which is under NPS study, per Congress' interest in preserving and commemorating it.

Such extensive linear resources offer tremendous potential for spreading the Service's stewardship ethic beyond the traditional "Islands of Hope." In fact, we have opportunities to take that ethic and put it to work in people's backyards. This year marks the 25th anniversary of the National Trails System Act, and efforts are underway to strengthen the Act and to develop the first National Park Service policy for administering its National Trails System units (nine historic and five scenic). The U.S. Forest Service and the Bureau of Land Management administer the remaining five units.

Our own program began with the Santa Fe National Historic Trail and the Masau Trail, and has grown to include the Trail of Tears National Historic Trail, encompassing the land and water routes (2,200 miles) used in 1838-39 to forcibly remove the Cherokees from their homelands in the Southeast to Indian Territory. The Trail of Tears Comprehensive Management Use Plan was only recently finished, and implementation has just begun. The Route 66 study, which is being prepared by the Denver Service Center, should be completed next year, and poses major philosophical and practical questions about what—if any—federal role is needed to preserve and commemorate it. Legislative efforts on the near horizon include studying, for national historic trail status, El Camino Real Para Los Texas (The Royal Road for the Texas) and El Camino Real de Tierra Adentro (The Royal

Road of the Interior Land). The Santa Fe National Historic Trail, our flagship, has been under development for almost three years, and the following primer will focus on the linear frontier and the opportunities we have found that it provides.

> The Santa Fe Trail was the first of America's great trans-Mississippi routes, crossing over 1,200 miles of the central and southwestern United States (Missouri, Kansas, Oklahoma, Colorado, New Mexico) between Franklin, MO, and Santa Fe, NM. This trail played a critical role in the westward expansion of the United

States, and for more than half a century (1821-1880) served as an important avenue for international then national—trade and cultural exchange.

The Trail has been planned to be administered with the same level of commitment-and traditional objectives of resource protection and appropriate visitor use-found in traditional units of the national park system. The Trail parts company with traditional units by being managed in rather non-traditional ways: 90% of its designated 1,200-mile route is in private ownership. Based upon the grassroots management emphasis of the National Trails System Act, we use a certification program to negotiate good-faith mutual agreements with willing landowners and other managing entities to maintain trail resources (such as ruts, structures, natural/cultural landscapes), and to provide appropriate visitor use opportunities according to NPS standards and policies. This system helps to protect landowner rights; instills in landowners great pride in protecting and sharing a national treasure, and rewards them with due national recognition; and



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stimulates grassroots interest in managing Trail resources. With a limited budget and staff, we have certified 17 sites and have a backlog of over 30 requests. Certified sites display the official trail logo, which we use like the Good Housekeeping Seal of Approval. People have to work for it and to keep it—for it is not given out lightly. Certification is renewable and runs two to five years, depending on the status of the site. A mature site without any need for changes will run five years, while a site needing substantial improvements or in the midst of planning may warrant a more tentative approach.

We, in turn, commit ourselves to providing technical assistance in the areas of environmental and other legal

compliance; protection of resources; and planning of developments like trailheads, hiking and horseback trails, and interpretive exhibits and other media. Subject to funding, we can provide limited financial assistance for partnership projects undertaken with grassroots support. We can also grant Volunteer-In-Park status to a landowner to help protect against tort liability.

Can we acquire trail resources? We can from willing sellers. Do we? Generally not. We

have identified only two places where we feel the integrity of the resources and the potential benefits are of such a magnitude to justify federal acquisition. Our philosophy is predicated in the volunteer management emphasis of the National Trails System Act. We do not have a vision of "doing it all" ourselves because, frankly, we can't afford it— and in our estimation local cooperators, properly trained and tooled, can "do it." More important, local involvement and participatory stewardship are worthy ends in themselves.

The trail is managed by a multitude of parties, but all our partners, urban or rural, adhere to consistent standards for resource protection, facility design, and quality of visitor experience. Because most national historic trails are discontinuous, this consistency becomes all the more critical in creating the perception of a uniform trail system. The Santa Fe Trail Association, the non-profit group dedicated to trail preservation and public education, has been instrumental in developing a collective sense of community and shared purpose along the trail. Among other things, it has fostered certification requests, helped with cost-share projects, helped draft a preservation guide, and provided us with historical data. Chapters are adopting trail segments and sites, and helping landowners to maintain certified sites. (We do not ordinarily ask landowners to pay for needed improvements, only to

allow them.) Appointed by the Secretary of the Interior, the Santa Fe National Historic Trail Advisory Council, representing over 30 agencies and groups, has been highly effective in reviewing our progress, resolving issues, and being available as a sounding-board. A host of agreements also help to provide the foundation for trail-wide partnerships.

To the general public, the Santa Fe National Historic Trail experience will be largely perceived as a consistent, well-managed, and well-operated system—but one lacking an overt NPS presence. The kinds of things we will do will ordinarily take place behind the scenes, but we view the trail as an NPS unit having the same objectives

as those being implemented for a Yellowstone or a Statue of Liberty. The only difference will be a radical change in the concept of institutions, and the acceptance of the "inside-out park." This is a park where there is no fixed boundary, and no single entry portal; where the diverse resources are not in one institutional ownership; where the resource stewards and ambassadors of goodwill and hospitality don't wear uniforms, but rather, ordinary clothes;

and where visitors come not only to take pictures of and immerse themselves in resource values, but also to take away memories of friendly people from diverse backgrounds and cultures doing an uncommonly good job of being themselves, caring for their pieces of our collective heritage, and unselfishly sharing with others. It is a park because, while there is no physical boundary, there is a parameter of quality and consistency that sets its places apart from the everyday experience, and holds them together.

The Santa Fe National Historic Trail will take many years to reach its full potential. Essential to its success will be continued public support, adequate operating funds to meet our cooperative responsibilities, and development of new partnerships. The lessons we have learned will be applied to the other trails on our linear frontier.



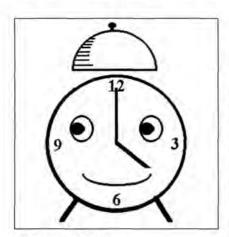
David Gaines is chief, Branch of Long Distance Trails, Southwest Regional Office, National Park Service, Santa Fe, NM.

## **Telling Historic Preservation Time Using Illusion with Care** to Reveal the Past

## A Viewpoint Kay Weeks

real clock tells "real time" (figure 1). The clock is not time itself, of course, but a representation of time. Without discussion or debate, scientists, historians, and poets would agree that time is the continuum of change, that a clock's rotating hands are synonymous with movement forward in time, and that, since the clock only represents time, if a clock stops, real time does not stop.

Real time is simple. It always moves one way, forward. The process and consequences are always the same: for



humans, birth to old age and death; building materials, from new usefulness through degeneration and disappearance; plant materials, from bud to maturity—and perhaps regeneration—but certainly change and often loss and even extinction.

Although stopping or reversing time is not a realistic endeavor, much human enterprise is based on this

Fig. 1. The Real Clock time, life-giver and destroyer, is represented here as a simple mechanism with an alarm

goal. Cosmetic surgery or treatments applied to faces or bodies may seem to slow the effects of time, but they cannot permanently reverse them. Similarly, treatments performed on the built environment—buildings, structures, sites, and objects—attempt to defy the physical and visual effects of time. Materials are maintained and repaired, but the advancement of time is absolutely equivalent to change, deterioration, decay, and, ultimately, loss or death. The real clock says that the built environment as we know it today will be the domain of archeology, in time.

Historic preservation clocks don't move in quite the same way that the normal one does (figure 2). What's different about these "interpretive" and seemingly arbitrary clocks is that they can be temporarily stopped in **preservation**; moved forward in **rehabilitation**; moved backward in **restoration**; or re-started and moved backward in **reconstruction**. It is these ideas about time that constitute the philosophical framework for historic preservation treatments.

It is true that people control the movement of all clocks, but, with historic preservation clocks, there are ongoing disagreements about *how and when to move them and what that movement means*.

In brief, historic preservation treatments manipulate "real time" in order to create interpretive contexts in which human behavior may be revealed or explained. The goal is to provide truthful and understandable explanations of the past. Even in the absence of written, graphic, or spoken explanation, what we choose to repair, replace or demolish ultimately shapes how the property's history exists in time and is perceived by today's and tomorrow's viewers.

If the real clock usually results in a property's decay over time through natural processes, then invoking one of the historic preservation clocks in order to "save it" is decidedly more complex.

At the heart of historic preservation are several notions. First, the idea that nothing is intrinsically significant. People ascribe significance to certain places or things from the past. It might be a design, an example of craftsmanship, a way of life or culture, a scientific finding, an association with someone who said or did something, or a place where something happened. These places are chosen based on popular and scholarly judgment and opinion. People tend to disagree about societal values, that is, what should be chosen to represent America's collective past. People may also disagree about who does the choosing. The highest ethics must be employed in designating historic places so that consensus is achieved on what we *mean* by historical significance prior to treatment.

Often the same people who designate places "historic"—on the local, state, or national level—are not the same ones who decide how these places will be treated.

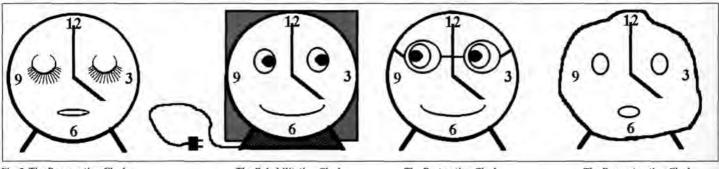


Fig. 2. The Preservation Clock time asleep for record-keeping purposes

The Rehabilitation Clock time plugged-in to current needs The Restoration Clock time looking backward to find significance The Reconstruction Clock time startled into new life by ghosts of the past Historians, citizens, and administrators may decide what is historic; owners, planners, architects, and developers may decide how they are treated. As a result, places are not always treated to save what the historians judged to be significant. And always, people who pay for the treatment of historic properties tend to control the work and, thus, the meaning of the work. Economics and the ethics of preservation are seldom equal partners.

Since real time—the accumulation of things, change, loss, and layering of events—tends to be cluttered, it does not usually constitute a logical or beautiful picture. The desire to depict a sanitized, but more inviting, past is a common one. No one can dispute what seems to be a compelling human need to reproduce the symbols perceived to represent a more harmonious past in order to



Fig. 3. Historic clock in historic setting (left). Photo by Jack E. Boucher, HABS. Reproduction clock intended to impart character to new places (right). Photocopy ad, Electric Time Company, Inc., Medfield, MA.

soften the impact of contemporary life (figure 3). Without historical documentation, these non-contextual features always create historical anachronisms; some of them will no doubt be taken more seriously than others by subsequent interpreters.

Setting the historic preservation clock at several different times within a single project to selectively restore those areas of history we find attractive or to selectively eliminate those areas we find unattractive or painful, creates "freaks of time" for our grandchildren and archeological puzzles for those who will live in future centuries. Most important, this type of random work neither reveals nor explains truths about our past; by omission, it can feed into our deepest and ugliest prejudices and fears.

The preservation of our physical past, when handled openly and truthfully, can convey powerful lessons. We can't ever, really, turn back the clock, but we can approximate, as best we can, what we know of the past. For example, if a wing of an early-19th-century plantation house were being reconstructed in order to interpret a property's pre-Civil War significance, then the vanished slave quarters should also be reconstructed because they were an integral part of the history—perhaps, in truth, the focus of it.

Dealing with the past is essentially like dealing with the present. We make choices about the way we relate to other people. We can lie, cheat, steal, ravage, and falsify. (It's easier doing it in historic preservation because the people historic places symbolize are all dead.) Because our predecessors can't speak for themselves, we become their voices whenever we take on a preservation project. We can silence the voices or we can listen and try to understand the complex circumstances that comprise the history, then choose to accept that as reality, even as we respectfully add to it with our own lives. Or we can choose to approach the past in varying degrees of ignorance and perhaps, while not willfully changing or destroying it, simply disregard its power. All the choices are there. That's why an ethical framework for making treatment decisions is critical. By subjecting ourselves to consistent "rules of the clock" we acknowledge the idea that historic preservation has more to do with social responsibility than subjective beautification.

Finally, and perhaps most important, historic preservation time is *emotional* time. Remember, these are real places we're talking about—with form, and features, and detailing. They may be in varying stages of deterioration, but they are still physically discernible; they have their historical integrity. At the same time they represent ideas or memories of former lives—our ghosts. People often disagree about the stories that are told about these real places that represent people who are gone. And who decides whether an ancestor will endure on the interpretive time line, or simply disappear?

The National Park Service stipulates four ways that a historic property may be treated within consistent frameworks: preservation, rehabilitation, restoration, and reconstruction. Even without explanation, the names convey something of the principles they contain. Whatever names are given to various approaches to project work and there are many—it is the difference in the way a property is made to exist in time that separates the focus of one treatment from another. In addition to factoring in the property's proposed use and the available budget, choosing a treatment for a property requires decisions about its historical value, what remains to convey that value, and how that value is to be expressed in the work itself.

In the treatment, **preservation**, the existing form, materials, features, and detailing of a property are maintained and conserved. This may include preliminary measures to protect and stabilize it prior to undertaking other work—or protection and stabilization may be an end in itself, for example, in an archeological project. Extensive alterations and additions for a current use are not undertaken; neither are features removed to reveal an earlier time. Repairs are made with the same materials and are documented so that old and new may be discerned. In the work and for interpretive purposes, an illusion is created that time has simply stopped (figure 4).

Rehabilitation is closer to the agreed-upon movement of a clock than the other treatments. That's because its definition says that a property, as evolved over time, may (*Time*—continued on page 14) (Time—continued from page 13) Preservation



Fig. 4. Drayton Hall, near Charleston, SC, was built in 1738-42. It was preserved in the 1970s as a record of an evolved 18th century plantation house and landscape. Photo by Jack E. Boucher, Historic American Buildings Survey.

## Rehabilitation



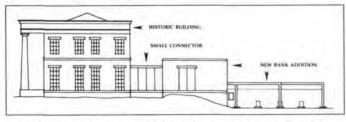


Fig. 5. The Stephen Upson House, Athens, GA, was built in 1847. It was rehabilitated in the 1980s with a major new addition in order to serve as a drive-in bank. Photo by Rodney Gary. Drawing by Christina Henry.

be altered or added to at this moment in a contemporary design, to meet continuing or new uses. Rehabilitation acknowledges that time moves forward and properties change, but some essential character remains. Deteriorated materials are repaired and some missing features may be replaced to try to recapture the overall feeling (some backward movement of the clock is acceptable). Of the four treatments, this is perhaps the most practical and realistic because it considers time present and time future, as well as time past. Contemporary or non-historic materials are used where the same materials would be impractical. Rehabilitation focuses more on how people continue to use and adapt properties according to changing needs than on historical interpretation (figure 5).

Restoration purposely backdates a property to make a point about its historical significance at a particular time. For example, a house built in the 1790s might have been changed and changed again through time to 1993, but in restoration it would be re-configured to look like it did in the 18th century or 19th century. In a dramatic sweep of the hands, the historic preservation clock is moved backward to make an interpretive point about an earlier time. This is "depiction," pure and simple. A problem occurs if people are led to believe that what seems to be, is, and that a restored building, for example, is actually an earlier building, not just the illusion or depiction of it. So this process is not really simple at all. In restoration, later historic materials are removed, and features from the period of significance re-introduced in all new materials to recreate an earlier appearance (figure 6). Backdating can be an extremely harsh treatment; or, it may be more a matter of revealing earlier craftsmanship that was covered over. Still, the loss of naturally occurring historical layering defines this treatment, and going backward in time is much like salvage archeology. The greater the need for historical focus and "authenticity" the more fabric will be sacrificed in order to get to a purified or simplified abstract ideal, which, in some cases, may not even be true.

In fact, the entire issue of dealing with missing historic features is a difficult one from an ethical standpoint, if "telling the truth" is the goal of project work. A feature may be missing due to lack of maintenance, an occupant's whim, gratuitous vandalism, or a host of other reasons. It is much easier to repair existing historic materials and features even if they are extensively deteriorated than to decide what to do if a feature is missing. If a feature is missing and documentation exists to replace it with all new material, then the preservation and restoration standards say that the new feature needs to match the historic feature and also be dated to assist future research. The end result is admittedly a "depiction" of past reality, but this is fair, since we have already accepted the consequences of arbitrary clocks in historic preservation. In rehabilitation, the missing feature can either be restored (based on research), or a compatible, contemporary feature fabricated. Rehabilitation is more flexible because of its connections to real time and the need for practical adaptation.

On the other hand, if a feature is missing, and there is little or no information available, ethical issues arise, and, with them, a lot of lively controversy as well as some inappropriate solutions. If real time declares that loss is inevitable, the most obvious solution would be to acknowledge it, leave a blank spot in the work, and sim-

## Restoration



Fig. 6. The Elizabeth Cady Stanton house, Seneca Falls, NY, was built in 1846 (Stanton lived there from 1846 to 1863). Because the house was substantially altered after her death, (see photo left), a decision was made in the 1980s to restore it to an earlier appearance in order to depict and interpret Stanton's important historical contributions (see photo right). Photo left: NPS files; Photo right: courtesy Eastern Monument.

ply interpret the loss. This solution doesn't mesh very well with the human need for a clear and visibly "finished" product, however, so is largely unacceptable; thus, where information is sparse or non-existent, the human mind—replete with illusions and expectations may be more apt to fabricate an idealized picture of what was, than to seek out and document the reality of the past. Leaving voids in projects to interpret loss also is not very practical if a missing piece is functional, such as a roof, door, or stairway.

Another ethical question generally accompanies restoration as well as reconstruction. Some would argue that if a design exists on paper which was never carried out historically—in real time—then it is appropriate to build it "in historic preservation time" for the sake of revealing and interpreting design genius, and thus, completing history (such as a planned, but unbuilt, wing to a building). These tributes to the mind, when carried out, put the viewer in a "might have been" theater, yet the public could easily view such a depiction as something

#### **Definitions of Four Treatments**

**Preservation** is defined as the act or process of applying measures necessary to sustain the existing form, integrity, and materials of an historic property...

**Rehabilitation** is defined as the act or process of making possible 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.

**Restoration** is defined as the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period...

**Reconstruction** is defined as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.

that occurred in real time. So there is a rule that says "if it was never built historically, it can't be newly constructed" because, in essence, that's cheating.

The fourth treatment is **reconstruction**. Somewhat like magic, it takes a property that has vanished over time, and re-establishes it in time. When a property has physically disappeared, a fabrication is undertaken to explain the truth about the past (figure 7). It would seem unnecessary to discuss the reality of this treatment. Because reconstruction brings a vanished property back to life, there is a greater burden to be precise. Accordingly, the National Park Service's Standards for Reconstruction are stringent.

Moving into the illusory past through restoration and reconstruction, even when accurate, is, at the least, entertaining. It is also perhaps somewhat soothing psychologically because a depiction of reality keeps us from confronting real time in the present—if even for awhile and, in consequence, creates even more distance between

(Time—continued on page 16)

#### Reconstruction



Fig. 7. The Governor's Palace, Williamsburg, VA, was built in 1706 and destroyed by fire in 1781. In the 1950s, it was reconstructed to interpret American colonial life in the 18th century. Photo courtesy Colonial Williamsburg, Inc.



Fig. 8. Independence Hall's Reconstructed Clock (1972-73). Cast stone and wood with fiberglass and polyester bronze ornamentation. Photo by Lee H. Nelson, FAIA.

Science and technology assist preservation by creating meaningful illusions from contemporary, substitute materials.

the illusion and our own death, i.e., the vast continuum of history. We also have no assurance of whether or how we will be remembered. There is, in reality, little time, and it is less frightening to move backward than forward. This may be one of the reasons some people eschew all things contemporary in favor of trying to recapture the feeling of the past.

The role that science and technology play in saving and replacing historic forms and features within historic preservation time carries its own ethical baggage which the Standards also address. Technology seeks to preserve historic materials on one hand; but on the other to fabricate substitute materials that look old for replacing deteriorated and missing features but are, in fact, new. Treatments undertaken on historic properties today will become the records of tomorrow (figure 8). The repairs and material replacement of today designed to fend off the effects of time will, in the future, become part of the record and they, too, will move through real time. Part of the ethical framework is making clear what is old and what is new, through documentation or other distinctions, such as simplification in detailing.

Reconstruction and restoration projects can open the door to human error in decisionmaking. Rehabilitation, because of its link with new uses and change, has the potential for changing a property's historic character. Of all the treatments, preservation is the gentlest because it focuses on the maintenance of existing materials, even while it endeavors to stop the historic preservation clock for interpretive purposes.

What can we call historic preservation time in general? We could call it "art" because it is more manipulative than real. Or we could call it "managed" because that is defined as "altering by manipulation." But we can't and shouldn't call it real: We can't recreate the past nor what has been lost, nor can we stop the present from becoming the future.

What conclusions can be made? Historic preservation is a blend of science and the humanities, a form of art, a task that is manipulative, reflective, interpretive, but, hopefully, not arbitrary and irresponsible. But even within this admittedly "theatrical" framework, our actions as keepers of the collective record need to be as honest and consistent as possible so that our successors can evaluate the overall record, and glean some meaning from it.

Responsible historic preservation means, in part, defining the real past—within admittedly artificial time constructs—and accepting our role as stewards rather than revisionist designers. However, sometimes in our historic preservation work, we seem more like perennial children, trying to leave our mark on time (figure 9).

Hickory Dickory Dock What can we do to shock? They built our past, Now it's ours at last, To make mockeries of the clock!

If historic places represent our ancestors—and they do—treatments shouldn't be undertaken at their expense. Real stories about real lives shouldn't be skewed or erased or manipulated to "make a buck" or "simply look pretty." Let new construction be innovative; historic preservation treatments should always be more cautious, careful, and respectful in their attitude toward people from the past, the built environment, and time.

Kay Weeks is a technical writer and editor in the Preservation Assistance Division, National Park Service.

Clock illustrations by E. Blaine Cliver, chief, Preservation Assistance Division, National Park Service.

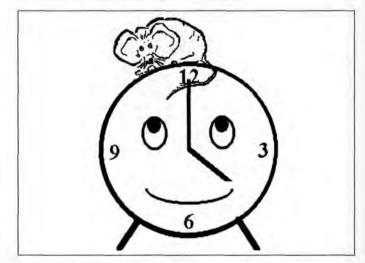


Fig. 9. Nursery Rhyme Clock time continues; frightened mouse runs away

## The Box City Project of Fredericksburg, VA

## Vanessa Matthews Karen Vossenberg

redericksburg is a small city located along the banks of the Rappahannock River in central Virginia. Nationally recognized for its rich historic, cultural, and architectural heritage, Fredericksburg is a city that exemplifies the benefits of historic preservation. The Historic Fredericksburg Foundation, Inc. (H.F.F.I.) is one of the oldest and most successful local preservation organizations in the country. Founded in 1955, the Historic Fredericksburg Foundation was instrumental in developing a comprehensive plan for local preservation. In the early 1970s, a 40-block area of Fredericksburg was placed on the National Register of Historic Places, due in large part to the efforts of H.F.F.I. The Women's Council of the Historic Fredericksburg Foundation was organized 23 years ago to support and assist the foundation in its misrounds them. The project involves a "hands on," interdisciplinary approach to the activity. The curriculum areas of mathematics, history, language arts, architecture, and art are all integrated in the production of the final project. Students participating in the project construct cardboard replicas of residential and commercial buildings in a selected geographic area of downtown Fredericksburg. The models are displayed at the Historic Fredericksburg Foundation's Market Square Fair, an annual event which highlights the importance of Fredericksburg's Market Square. The fair, which attracts several thousand people each year, provides the Women's Council with a wonderful opportunity to share the students' work with the community.

This year the Box City chairmen, Karen Vossenberg and Anne Holmes, were overwhelmed by the response they received after they had invited local educators to participate in the project. Twenty classrooms, representing eight local schools, responded favorably to the invitation to participate. Students in grades four through eight took part in the program. The children worked in small groups within their classrooms to complete the project. A 12-block area of Fredericksburg was selected to be represented by the students' models. This area is located largely within both the National Register and locally designated historic districts. The structures included both residential and commercial buildings representing many

sion. Realizing the important role that education plays in the preservation process, the Women's Council has recently rededicated itself to achieving preservation goals through education. As a first step in achieving this goal, the Women's Council initiated the "Box City Project," which recently completed its second year.

Vanessa Matthews, the 1992 chairman of the Women's Council, launched the Box City Project, having been inspired by a similar concept pio-



styles of architecture and spanning three centuries of construction. Each classroom was assigned a half block area of buildings to reproduce, although some of the older students were assigned an entire block. The classroom teachers were provided with a Box City educator's packet that included: a plat map of their assigned block; a map of downtown Fredericksburg, which highlight-

"Box City" the day of the fair.

neered by Ginny Graves, founder of the Center for Understanding the Built Environment. In its first year the project involved four classroom teachers and their students, and was enthusiastically received by the community. Encouraged by this initial response, the Women's Council adopted the project as an annual event.

The Fredericksburg Box City Project is an educational program designed to encourage area school students to become aware of the historic built environment that sured the 12-block area and provided perspective on the relationship between the project area and the entire downtown; photographs of the buildings that were to be constructed; information on local history related to the area and to specific structures; the mathematical formula necessary to calculate the dimensions of the model buildings; a directory of architectural terms; and a guide to Virginia's architectural periods and styles.

(Box City-continued on page 18)



House at 204 Fauquier St. Example of photo given to students.

(Box City—continued from page 17)

The students were encouraged to replicate the buildings' exterior details as closely as possible, choosing art materials that closely represented the building materials present on the actual structures. The scale models were assembled on tables at the Market Square Fair in an accurate representation of the 12-block area. Street signs were

placed at appropriate "intersections" and the Box City version of Fredericksburg was completed.

The students attention to detail was most impressive. Tiny strips of paper were attached to several models to represent clapboard siding. A standing seam roof was replicated using aluminum foil placed over thin plastic straws. From the detailed porch rails and the ornate Victorian trim of one house to the hipped roof and chimney of another, the children accurately reproduced their build-



The students who built the model of 204 Fauquier St.

ings. Although interior representation was not required, one group of students even recreated a commercial building's merchandise display!

The Women's Council received an overwhelmingly positive response to this project from both adults and children who viewed the display at Market Square Fair, as well as from the teachers and students who participated. The Women's Council is pleased with the progress that has been made with this project in its short history. Pleased, but not content. The enthusiastic response has inspired us to continue to enhance the project. In the instill the value of preservation into the citizens who will be making crucial decisions about it in the future.



The model of 204 Fauquier St.

coming years, we hope to expand the project by coordinating on-site visits to the project area where students would participate in an "architectural scavenger hunt." The Women's Council would also like to establish a classroom liaison program. The liaisons would meet with the students while they were working on the project to provide them with information concerning architecture and local history. By creating this type of liaison program we

> hope to further foster the appreciation of our rich local history and the importance of preserving the built environment.

It is our belief that through the knowledge of history and architecture, an appreciation for the built and cultural heritage is nurtured. The preservation of our community's architectural past greatly contributes to the quality of life that the residents of the Fredericksburg area enjoy. We hope that through such programs as the Box City Project we can

Vanessa Matthews was the 1992 chairman of the Women's Council of the Historic Fredericksburg Foundation.

Karen Vossenberg was one of the chairmen of the 1993 Box City Project.

## Special Report

## The Federal Preservation Officer: Responsibilities and Qualifications

## A Report and Recommendations to the National Park Service

By a workshop of Federal Preservation Officers convened January 27-28, 1993

## Thomas F. King Facilitator and Compiler

## Introduction

Section 110(c) of the National Historic Preservation Act of 1966, as amended (NHPA) requires that the head of each federal agency, unless exempted, designate "a qualified official to be known as the agency's 'preservation officer' who shall be responsible for coordinating that agency's activities under this Act." Section 110(c) goes on to say that such an official may be "considered qualified" if he or she "satisfactorily completes an appropriate training program established by the Secretary (of the Interior)."

Section 101(j) of NHPA, added to the Act by amendment in late 1992, directs the Secretary of the Interior (represented by the National Park Service) to "develop and implement a comprehensive preservation education and training program" in consultation with the Advisory Council on Historic Preservation, other federal agencies, and a wide range of involved non-federal parties. This program is to include "new standards and increased preservation training opportunities for federal workers involved in preservation-related functions."

Section 112 of NHPA, also added in 1992, provides for the Secretary of the Interior and the Office of Personnel Management to develop new performance and qualification standards for federal employees and contractors in historic preservation, in consultation with other agencies and concerned groups.

Collectively, these statutory mandates suggest, among other things, that the National Park Service (NPS), in consultation with the Advisory Council and others, should consider establishing an education and training program or programs under which federal Preservation Officers (FPOs) can be recognized as qualified pursuant to Section 110(c), and can retain and improve their qualifications<sup>1</sup>.

To initiate an exploration of the potential for such a program or programs, NPS's Interagency Resources Division organized a workshop on January 27-28, 1993. Assisted by the National Preservation Institute, NPS requested the attendance of 21 FPOs, representing a wide range of agencies and missions, and many years of experience in their work, together with representatives of the Advisory Council and the State Historic Preservation Officers (SHPOs). The workshop was designed to develop:

 An accurate general depiction of FPO responsibilities and qualifications, based on the collective experience and expertise of the FPOs; and  Recommendations to NPS regarding any actions the FPOs regard as desirable regarding FPO qualifications, education, and training.

This report summarizes the workshop results. A complete list of participants and minutes of the workshop are available as separate documents.

## How FPOs are Designated

The workshop revealed a great diversity in the manner and level of formality with which FPOs are designated by federal agency heads. In some cases there has never actually been a formal designation; the FPO has simply "assumed the title" and never been challenged. In other cases the title has been assigned in a more or less serendipitous fashion: the agency finds that in order to answer a questionnaire or the question of a Congressional committee, or to address a preservation problem, an officially designated FPO is needed, and therefore designates one with little explicit consideration or justification. The Navy is an example of an agency that recently has designated its FPO in a highly formal fashion, after detailed study, with an official articulation of authorities and responsibilities.

It was the unanimous opinion of the workshop that it is desirable for agencies to designate their FPOs officially, based on full consideration of the FPO's roles and responsibilities, and to spell out this designation and its implications in appropriate official promulgations to the field. It was also agreed that FPO functions should be spelled out in official position descriptions and performance elements and standards.

## What FPOs Do

The exact functions of FPOs vary from agency to agency. In GSA and NPS, for example, the FPOs regard it as an important part of their responsibilities to maintain inventories of their agencies' known historic properties. In FERC and the federal Highway Administration, which have no such inventories, this function is irrelevant, while in the Forest Service the inventory is so vast, and the agency so decentralized, that central inventory maintenance would make no sense. FERC is developing an inventory of historic properties affected by pipeline projects it licenses, and the Forest Service maintains inventories at the regional and forest level, but the FPO is not personally responsible for oversight of these inventories.

The workshop developed a list of FPO functions, but it should be recognized that not all FPOs perform all such functions. Besides the fact that some functions are more relevant to some agencies than to others, to a considerable extent all those listed are more accurately identified as functions that the workshop participants regard as desirable for an FPO to perform than as those that they regularly perform or are able to perform. Finally, the functions identified are really those that should be performed by a Federal Preservation Office, not necessarily by an individual FPO per se. The exact functions of the individual bearing the FPO title depend on the administrative model adopted by the agency (See "The FPO in the Administrative Structure of a Federal Agency," below).

With these caveats, the following were identified as major FPO functions:

Explaining historic preservation to others. Whether the FPO acts as advocate for preservation within the agency or merely explains legal requirements, most FPOs spend much time explaining to others in the agency what historic preservation is about—its principles, its processes, its legal requirements, the significance of historic properties and realistic means of preservation.

Point of contact. The FPO is, or should be, the agency's principal point of contact with such preservation entities as NPS, the

(FPO-continued on page 20)

#### (FPO-continued from page 19)

Advisory Council, the National Conference of SHPOs, and public preservation groups.

Policy development, interpretation, and implementation. The FPO drafts and advocates promulgation and implementation of preservation policy within the agency, and helps other elements of the agency interpret and apply it.

Correspondence control. If the FPO does not actually sign or surname all outgoing correspondence dealing with preservation, he or she should at least keep track of it and be able to influence its content.

Program and budget. The FPO oversees, directs, manages, or at least significantly influences the agency's historic preservation program, and has a substantial say in its articulation with the agency budget process. In agencies that manage historic properties (e.g. GSA), this function includes making judgements about the relative level and nature of a property's significance as a basis for allocating resources to its maintenance and rehabilitation.

*Project review.* The FPO plays a significant role in the agency's compliance with Section 106 of NHPA and related authorities (e.g. NEPA, AIRFA, NHPA Sections 110(b), 110(f), 111). The exact role varies from agency to agency, but the FPO is involved at least in explaining the review process to others (at other administrative levels or in other offices or bureaus), helping interpret it, helping move projects through it, and explaining the agency's mission and needs to such "regulatory" agencies as the Advisory Council and SHPO.

Implementing other legal requirements. Depending on the nature of the agency and its mission, the FPO may be involved in implementing the Archeological Resources Protection Act (ARPA), the Native American Graves Protection and Repatriation Act (NAGPRA), the Public Buildings Cooperative Use Act (PBCUA), the Americans with Disabilities Act (ADA), and other authorities bearing on historic preservation.

Evaluating and nominating properties; maintaining inventories. As noted above, this responsibility varies widely from agency to agency, but every FPO becomes involved at least in evaluating properties in the context of Section 106 review, and those that actually administer lands or buildings become involved in nominating them to the National Register of Historic Places and in maintaining inventories of significant properties. Most FPOs have signature authority on National Register nominations.

### The FPO in the Administrative Structure of a Federal Agency

The workshop participants vigorously debated the level at which an FPO should be placed in the administrative structure of an agency in order to enable him or her to coordinate the agency's activities under NHPA. Although there is considerable variability across the federal establishment, three basic models were recognized.

*Model 1:* The FPO occupies a relatively high level in the agency structure, at which he or she has coordinative authorities that reach across the entire agency. Examples include the Deputy Assistant Secretary for Environment Safety and Occupational Health in the Air Force, and the Secretary of the Federal Energy Regulatory Commission (FERC).

The major advantage of Model 1 is that the FPO has clear authority to ensure that the various requirements of NHPA are effectively addressed throughout the agency, and that they are understood and attended to at the highest levels of agency decisionmaking. The major disadvantages are that the FPO inevitably has responsibilities other than those of FPO, and in most cases is unlikely to have deep expertise in historic preservation.

It follows that in order to carry out the FPO's coordinative functions, a Model 1 FPO needs ready access to professional preservation staff, and at least sufficient general "sensitivity" training to understand the requirements imposed and opportunities presented by NHPA and other preservation authorities.

Model 2: The FPO is the head of a program office within the agency, to which historic preservation responsibilities are assigned. Examples include the General Services Administration (GSA), where the FPO is the director of the Arts and Historic Preservation office in the Public Buildings Service, and NPS, where the FPO is the chief of the History Division.

A Model 2 FPO is more likely than a Model 1 FPO to have great personal experience and expertise in historic preservation. As office head, the Model 2 FPO also is able to have direct influence on program and budget development. The extent to which a Model 2 FPO can influence agency-wide policy varies from agency to agency, and in some cases it may be difficult for a Model 2 FPO to know what other program offices are doing, even when these offices carry out programs that may have profound impacts on historic properties.

An agency that elects to follow Model 2 needs to establish clear lines of communication, coordination, and authority between the FPO and other program offices, as well as up and down various chains of command. Like the Model 1 FPO, the Model 2 FPO needs access to the expertise of specialist staff. Because Model 2 FPOs typically have functions other than those of FPO (though usually in more or less related fields), their training needs include introductory training when they assume their jobs, coupled with periodic updates on changing laws, policies, and programs.

*Model 3*: The FPO is a preservation expert within a program office to which preservation responsibilities are assigned. Examples include the Navy and the U.S.D.A. Forest Service.

The clear advantages of Model 3 are that the FPO is by definition an expert in some preservation-related field (typically the holder of an MA or PhD in an appropriate discipline, and with multi-year experience), and that he or she devotes full time or virtually full time to the FPO job. The disadvantages include a relatively low level of authority within the agency, difficult access to high levels of decisionmaking, and in some cases even to the budget process, and a high potential for being unaware of, and unable to influence, the actions of other program offices within the agency. A further disadvantage may be that an individual FPO's personal professional background may tend to bias the agency's approach to preservation; for example, an FPO trained as an archeologist may tend to give the entire agency program an archeological cast, to the disadvantage of non-archeological historic properties.

An agency that establishes a Model 3 FPO needs to pay very close attention to the administrative structure through which the FPO will exercise his or her coordinative responsibilities. The structure must be designed in a sense to amplify the authority of the FPO throughout the agency in order to ensure that the requirements of NHPA and related statutes are met by programs with which the FPO has no line relationship. To minimize the dangers of individual professional bias, the FPO-like the Models 1 and 2 FPOs-also needs structured access to an appropriate network of other preservation specialists. Training needs for the Model 3 FPO include introductory instruction in legal, procedural, and policy requirements when new in the job, periodic updates, and specialized training relevant to the historic resources and preservation issues with which the agency deals. This last kind of training is particularly relevant because the Model 3 FPO may be the only preservation professional in the agency, and because even in agencies with larger preservation staffs she or he is likely to be much more involved in 'hands-on" preservation work than his or her Model 1 or Model 2 colleagues.

No agreement was reached as to whether any of the three models was superior to the other two. Two things did seem to be agreed upon:

The decisions an agency makes about the FPO's functions and qualifications effectively define the position of the FPO in the administrative structure, and vice versa. If the FPO is to have agency-wide coordinative abilities and authorities, the agency virtually must either adopt Model 1 or something close to it. If the FPO is to have extensive professional qualifications in preservation, and perform "hands on" functions in the preservation program, the agency is almost automatically committed to something approximating Model 3.

The basic rule should be: place the FPO in a position where he or she can be effective. This means:

- Having access to money and FTE;
- Influencing policy;
- Having the authority to allocate resources (financial, personnel, historic);
- Having access to information (e.g. what different elements of the agency are doing or may do that can affect historic properties, negatively or positively).
- · Being able to require that decisions are implemented; and
- Being accountable for decisions and agency actions.

Another administrative matter that was briefly discussed, but on which no particular conclusions were reached, was that of the relationship between the FPO and regional or field offices. It appeared to be generally agreed that the accountability of regional and field offices to an agency's national preservation program—and the accountability of the FPO for the actions of regional and field offices—is a major, rather knotty, issue. Many FPOs find themselves effectively in only advisory positions vis-a-vis regional and field offices, or unable to influence such offices except through complicated and pitfall-laden traverses of the agency's chains of command. In comments on the draft of this report, one FPO succinctly articulated this problem as follows:

"Many agencies are decentralized, with FPO type functions being delegated to regional/state offices or field offices. The FPO certainly plays a pivotal coordination role, but in many cases, a great deal of the day-to-day work is performed by other individuals only remotely tied to the headquarters/central office. This issue is important to remember.... Let's not focus all of our attention on the relatively small group of FPOs and forget the larger community of historic preservation professionals that perform much of the meaningful work."<sup>2</sup>

## **FPO Qualifications**

The workshop participants discussed the qualifications that an FPO should possess, in other words, "what makes a good FPO?". It should be noted that this issue was put to the participants in the form of a question, in essence: "if you were recruiting a successor for yourself, what would you look for?" Since the participants were invariably FPOs in Model 2 or 3 agencies, or staff to Model 1 FPOs, the results cannot be taken to suggest the qualifications of a Model 1 FPO. Again, we are defining more the qualities of employees in a Federal Preservation Office than the qualities of an individual FPO.

Federal experience was widely perceived to be a prerequisite. Experience should be at a supervisory level. Multiple agency experience is desirable, and should include developing policy and procedures. Experience in contracting and consulting is viewed as desirable, as is experience in interdisciplinary work. Ideally, experience should include experience both within and outside preservation. Experience in preservation does not necessarily mean professional training in a particular preservation discipline. Although the FPO needs access to professional expertise, the actual FPO need not be a preservation professional.

Political awareness is necessary. The FPO must be able to balance preservation with other values intrinsic to or bearing on the agency's mission. He or she should be a good negotiator, and be flexible enough both to influence and to accommodate change. One participant stressed the need to be aggressive and to have a high pain threshold. Organizational and management skills are important, particularly for those who actually manage programs. Creativity, problem-solving abilities, and strategic sense are important to all FPOs.

*Knowledge of the law*—not only its letter but its intent—is important, as is an understanding of the external systems with which the agency must interact, such as the systems overseen by SHPOs and the Advisory Council.

Knowledge of the agency's mission and operations, or a readiness to learn, is of vital importance to the effective FPO.

Technical expertise in relevant preservation disciplines is important, but need not necessarily reside in the FPO herself or himself. An FPO without such technical expertise needs ready access to staff or consultants who possess it, and needs to know when and how to avail himself or herself of it. The kind of technical expertise that is appropriate varies from agency to agency, mission to mission. For example, GSA needs more expertise in architecture and landscape architecture than in archeology or cultural anthropology. Typically, however, each FPO needs access to multiple kinds of professional expertise.

### What Does NOT Work

The participants spent a little time identifying recurring problems with agency programs—in other words, what does not work. Major problems identified included:

Nobody at the center. Decisions about preservation-related issues are made without accessing relevant expertise. This may occur in a Model 1 agency when the FPO lacks effective access to, or does not avail himself or herself of such access to, knowledgeable advice, or in a Model 2 or 3 agency when the FPO is not consulted about agency decisions bearing on preservation. More rarely it may occur in a Model 2 or 3 agency whose FPO lacks relevant information or expertise.

Gridlock. Decisions are not made at all, or are unnecessarily delayed, because there is a vague, ill-defined, or simply inaccurate perception of what is required by the historic preservation laws. This typically occurs in an agency that has failed to spell out the authorities and relationships of its FPO, and/or failed to ensure that the FPO is appropriately qualified and trained. It also may occur in decentralized agencies where people performing FPO-like functions at the regional office or field office level are poorly trained or unable to access the FPO efficiently.

Too many layers. Decisions are encumbered by the need to clear them through multiple levels of bureaucracy. This is almost unavoidable in any line/staff or headquarters/regional office organization, and the problems it creates may be balanced by its advantages in many cases, but any agency that finds itself spending a great deal of time on internal coordination needs to consider whether its organizational structure is effective in getting its job done.

#### The 1992 Amendments

The workshop gave special attention to the implications of the 1992 NHPA amendments with respect to FPOs.

§§ 101(j) and 112 (Education, training, standards)

These amendments underscore NPS responsibilities and authorities with respect to FPO training, though they go far beyond this to address a wide range of other education and training issues.

The amendments stress consultation with others, and the workshop participants wish to underscore this stress. Many excellent education and training programs pertinent to FPO functions already exist, and many standards are already in place, either government-wide or in particular agencies, states, and regions. All these should be carefully considered in implementing the amendments. There is no reason to reinvent wheels. This is not to say that further training is not necessary;

(FPO-continued on page 22)

#### (FPO—continued from page 21)

currently available training by no means covers the ground. Any training that is developed, however, should be coordinated with, and complement, not duplicate, what is already available<sup>3</sup>.

§ 110(a)(2) (Federal agency programs)

The rewriting of § 110(a)(2) will require agencies to pay more attention to program development, in consultation with NPS, the Advisory Council, and others. This is an important opportunity for program improvement across the federal establishment.

§ 110(a)(2) does not necessarily in and of itself describe a complete program: other requirements of NHPA (e.g. §§ 110(a)(1), 110(b), 110(d), 110(g), 110(k), 111, 112) and other authorities (e.g. ARPA, NAGPRA, PBCUA, ADA) must be integrated into § 110(a)(2) programs.

The sequence of activities described in preamble of  $\S$  110(a)(2) are not to be taken as implying priority order.

§ 110(k) (Anticipatory demolition)

This provision has major implications for regulatory and assistance agencies, and requires further study.

It also has implications for land managing agencies that issue rights-of-way across federal land, for agencies that assist state and other programs of local land-use regulation, and probably for a variety of other agencies. The issues involved for such agencies are complex, and must not be ignored.

### **Conclusions and Recommendations**

Although many issues were left unresolved, and in fact are probably not resolvable by a group like the one assembled, certain definite conclusions were reached, which in turn form the basis for recommendations to NPS.

NPS should offer assistance in agency program development.

There was general agreement that NPS assistance would be useful in the further development, formalization, and improvement of federal agency preservation programs, including but not limited to the establishment and maintenance of qualified FPOs and other staff. The participants recognized that the 1992 NHPA amendments increase and clarify NPS authority to provide such assistance. Amended § 110(a)(2) of NHPA, providing for agency program development in consultation with NPS, the Advisory Council, and others, could be the primary statutory basis for a collegial enterprise in agency program improvement across the federal government.

The workshop discussed the pros and cons of NPS-issued "standards and guidelines" for agency preservation programs. Considerable concern was expressed about the promulgation of "standards"; many FPOs do not feel that NPS understands how agencies must balance preservation against mission requirements well enough to promulgate standards that would be realistic. Most of the participants felt more positively about nonbinding "guidelines" that FPOs could use selectively in encouraging improvements in their agency programs. At the same time, however, some felt that binding standards are necessary in order to help them prevail upon their agencies to pay attention<sup>4</sup>.

The needs of Federal Preservation Offices vary widely, and must be worked out on an agency-specific basis. The Advisory Council can be helpful in agency program development under Section 202(a)(6) of NHPA, but NPS can and should use its various authorities under NHPA in a compatible manner.

The sense of the group was that NPS should work toward developing guidelines and/or standards for agency historic preservation programs, as long as it does so in a collegial manner, in full, open, consultation with the FPOs, the Advisory Council, the SHPOs, Indian tribes and Native Hawaiian organizations, Certified Local Governments, and other interested parties. A number of participants expressed appreciation for the collegial nature of the meeting in which they were taking part, and the hope that this sort of spirit would be retained in any ongoing development of guidelines and training.

Any guidelines, standards, or other forms of assistance should address not only the qualifications and functions of the FPO as an individual, but those of the Federal Preservation Office, and its relations with other elements of the agency, including regional/state offices and field offices.

Agencies must be helped to recognize that no individual FPO can effectively handle all preservation problems and issues. Even in the smallest of agencies, or the agency with the least potential involvement with historic preservation issues, there will be the need at least to have access to a wide range of preservation specialists to handle circumstances where preservation issues do arise. Often, specialist expertise is particularly needed in regional/state offices and field offices, and the kinds of such expertise needed may vary from region to region.

While § 110(a)(2) of NHPA is the primary obvious authority for improved federal program development, it must be clearly understood that—as noted at u.3.2 above—§ 110(a)(2) provides only an organizational framework upon which an effective federal preservation program can be hung. The requirements of, and opportunities afforded by, such authorities as § 110(a)(1), § 110(b), § 110(g), § 110(k), § 111, § 112, ARPA, NAGPRA, NEPA, ADA, and PBCUA must be fully recognized and integrated into any federal preservation program to which they are pertinent, and addressed in any assistance provided by NPS.

NPS should further explore training program development. In consultation with the Advisory Council, FPOs, SHPOs,

and others, NPS should explore development of a training program to qualify FPOs, the staff of FPO programs, and others who work in agencies with FPOs. Like guidelines or standards, any such training program(s) should be developed in a collegial manner, and be designed to address the real requirements of the FPO's work as understood by the FPOs. This is not to say that the perceptions of agencies like NPS and the Advisory Council, as well as SHPOs, Indian tribes, local governments, and others are not important, or that preservation issues and developments that FPOs do not happen to give priority at a given time should not be addressed in training. It is only to say that the FPOs must be fully involved in the development of training, and that priority should be given to the real needs of FPOs, rather than to the interests and competencies of NPS or others who provide training—except where the two coincide.

Any such program should address not simply the qualifications of FPOs as individuals, but the qualifications of Federal Preservation **Offices** as wholes. It should focus on the professional and experiential qualities of individuals, but also on the organizational effectiveness of the structures within which they work. It should provide training for a variety of personnel who perform a variety of functions. It should address the needs not only of headquarters/central office staff, but of regional/state offices and field offices.

Any such program should relate positively to existing programs, including those of the Advisory Council, various SHPOs, agencies, and various academic institutions, rather than competing with them.

Elements of any training program that should be considered include:

- Establishment of training standards for different levels within an FPO organization, regardless of exactly where the title "FPO" is lodged. The head of an agency, for example, whether or not he or she bears the title "FPO," needs at least certain kinds of sensitivity training in historic preservation, while a technical specialist, again whether or not he or she bears the FPO title, requires other kinds of training.
- Multi-agency seminars and briefings tailored to agency mission. For example, assistance agencies have very different missions and mission implications for historic preservation than do land management agencies; particularly for

high-level officials, it is necessary to tailor training and education to agency responsibilities, rather than to assume that what applies to one FPO applies to all.

- Integration with, and perhaps accreditation of, existing education and training programs operated by other agencies and institutions, such as those of the Advisory Council and the Corps of Engineers.
- Annual, biennial, or quarterly update seminars for FPOs and key FPO staff.
- Establishment of a system of "continuing preservation education credits," similar to the continuing legal education credits required by the American Bar Association, that FPOs or key staff would be required to take in order to retain their qualifications.<sup>5</sup>
- Training targeted explicitly at regional/state office and field office staff, and at relationships between the FPO and such staff.<sup>6</sup>

First steps.

As an early step in carrying out the above recommendations, NPS should advise the heads of federal agencies that it is undertaking such an initiative, and request that each provide NPS with the following information to serve as a basis for further study:

The name, title, and position description of the agency's FPO; and

Copies of any and all documents describing the FPO's functions to the field, including any strategic plans, operating procedures, and internal delegations in which FPO functions are articulated.

The Federal Preservation Forum (FPF) should also be involved as a source of information and expertise in obtaining and reviewing information on federal programs.

## **Unresolved** Questions

A number of questions were raised during the workshop that were not resolved, and that should be considered during future discussions. These include the following:

- As a part of standards or guidelines for Section 110(a)(2) implementation, requiring or encouraging each agency to develop a "plan." Such a plan would constitute a formally articulated historic preservation program, which should address not only the requirements of § 110(a)(2) but other requirements of NHPA and related authorities. Although all seemed to agree that an organized response by each agency to the requirements of Section 110(a)(2) and related authorities was appropriate and needed, many were dubious about the notion of formal "plans." There was some feeling that the term "plan" carries unnecessary and confusing baggage.
- Maintaining an ongoing interaction group of FPOs that can share information, promote standards, and relate positively to NPS, Advisory Council, and other initiatives to implement the 1992 amendments. There is a clear desire to maintain a collegial relationship between the FPOs and NPS, the Advisory Council, and the SHPOs (among others), but no clear consensus on whether a definite group should be organized or recognized to maintain this relationship from the FPO side. It was not clear to what extent participants felt the FPF could perform this function.
- Environmental coordinators. Many agency programs use historic preservation or environmental coordinators at the regional and field levels. There seemed to be agreement that training specific to such coordinators might be appropriate, and that agency programs should address specifically how such coordinators are used, but there was insufficient time to explore their functions in detail.
- Environmental programs. Some agencies integrate their environmental protection and historic preservation programs. Time was not available to discuss the pros and cons

of such integration, which would be a fruitful topic for further exploration.

 Grade levels. At least some participants stated that they believe FPOs (at least in Model 3 agencies) are undergraded, resulting in reduced respect for FPOs within the agencies and a reduced ability to acquire and retain qualified FPOs. This question was not explored at all during the workshop.

<sup>1</sup> The NPS FPO, in comments on the draft of this report, asserted that this statement "seems potentially misleading," noting that "not until much later does the document affirm that existing training should not be duplicated" (Ed Bearss, NPS FPO 2/17/93). This statement was not intended to suggest that NPS should develop duplicative training; it was intended only to summarize the apparent direction of Congress. It may be worth noting at the outset, however, that the group was emphatic about the need for any NPS training efforts not to be duplicative, and to be coordinated with the training activities of other agencies. TFK

Kevin Kilcullen, Fish and Wildlife Service. Facilitator's note: It also must not be forgotten that many of the people performing "FPO-type functions" in regional, state, and field offices are not preservation professionals. On many military installations, for example, FPO-type functions are often among "other duties as assigned" performed by engineers, wildlife biologists, and others. TFK

<sup>3</sup> Facilitator's note: The NPS FPO, in comments on the draft of this report, drew special attention to the "roles the Advisory Council may play in this area. It seems that the Council is poised on the verge of some very constructive developments right now that could greatly facilitate meeting FPO needs for training" (Ed Bearss, NPS FPO, 2/17/93).

Facilitator's note: It might well be that a very short, general set of recommended standards would be in order, clearly grounded in statute and accompanied by flexible guidelines. The standard that "the FPO must be able to coordinate the agency's activities under the Act," for example, is directly derived from § 110(c) itself. It could be met through a variety of coordinative schemes, about which guidelines could be written. In comments on the draft of this report, the NPS FPO suggested that "some form of agency-specific advisory management assessment, based upon existing documents like the Secretary's Standards and Section 110 Guidelines, (might) be at least as helpful as another set of potentially overlapping 'recommended standards" (Ed Bearss, NPS FPO, 2/17/93). This suggestion may well be worth further exploration, taking into account that many agencies already have systems for periodic management assessments (e.g., the Environmental Compliance Assessment System [ECAS] in the Army), and the experience of NPS and the SHPOs in the management assessments now carried out by NPS under Chapter 30 of NPS-49. TFK

<sup>5</sup> The NPS FPO, in his comments on the draft of this report, suggested that "continuing preservation credits" and accreditation seemed "potentially duplicative, intrusive, and cumbersome." He also suggested that this paragraph in particular was a "possible problem area" in terms of the "precise limits of the NPS legal mandate" (Ed Bearss, NPS FPO, 2/17/93). These concerns obviously must be taken into account in further exploration of the possibilities raised by the group. TFK

<sup>6</sup> Facilitator's note: This was not explicitly suggested during the meeting, though it was implied. It was explicitly recommended by the Fish and Wildlife Service FPO in his comments on the draft report, and seems to be both an important point and one that is consistent with the general concerns of the group. TFK

## New Initiatives in Museum Archival and Manuscript Collections

## Diane Vogt O'Connor

Currently over 41% of NPS museum collections—11,800 linear feet or approximately 19 million items—fall into the category of museum archival and manuscript collections. These museum archival and manuscript collections include a broad range of document types essential for understanding and managing park sites, from architectural drawings, cartographic records, maps, photographs, oral histories, and park master plans, to files compiled for park administrative histories and historic correspondence.

These wide-ranging collections provide baseline data for managing parks and programs. Museum archival and manuscript collections include the following categories: 1) cultural and natural resource management records (such as records associated with park artifacts and specimens); 2) sub-official files (such as copy and duplicate documents used for reference); 3) personal papers (such as the records created or assembled by eminent individuals or families associated with a park or a park site); 4) organizational records (such as the records from Thomas Edison's laboratory); and 5) assembled collections (such as records gathered from various sources to document a specific topic, format, or individual).

A number of major archival initiatives are underway in the Washington Office of the National Park Service. First and foremost among these is the rewriting of the archival segment of the *Museum Handbook*, Part II (Appendix D). The new version of Appendix D has been expanded to contain guidance on appraisal, arrangement, and description of museum archival and manuscript collections.

The revised 94-page Appendix D includes a review of archival principles; guidelines for how to create archivalquality project documentation; descriptions of how to care for archival and manuscript collections; and explanations of archival techniques including surveying, appraisal, accessioning, cataloging (machine readable cataloging format [MARC] and the Automated National Catalog System [ANCS]), and arrangement. Appendix D also provides guidance on reference, access, and legal issues. This archival appendix is currently circulating to the regions for comments as a component of the *Museum Handbook*, Part II. Interested individuals should ask the regional curator for a chance to review the appendix.

In order to clarify what records belong in the museum property system, the archivist proposed changes to the *Records Management Guidelines* (NPS-19) based upon comments from the WASO cultural and natural resources division chiefs. The proposed edits, currently being reviewed by WASO records management staff, provide a clearer picture of the various categories of NPS resource management records and how to determine responsibility for records disposition and management.

Expanded and clarified guidance on archival and manuscript collections has also been incorporated in the revised draft of the Cultural Resources Management Guideline (NPS- 28) which was recently reviewed by the field.

Work has begun to reconstitute the Archives Advisory Committee. The Committee will be involved in planning for ANCS 4.0; developing servicewide archival training guidance; and preparing archivally-focused *Conserve O Grams;* as well as planning for the incorporation of archival and manuscript collections in all NPS management documents.

Since over 41% of NPS museum collections are archives, NPS must ensure that park and office staff have the resources necessary to manage these collections successfully. New servicewide initiatives in administrative histories, cataloging, preservation, and interpretation make it essential that archival collections be factored into all stages of park planning. A servicewide plan for NPS museum archival and manuscript collections is being developed.

We now have the opportunity to unearth these treasures and to manage them so that they effectively complement other park resources. Preserving, arranging, and describing these archival and manuscript collections will ensure that the memory of NPS staff and their achievements does not vanish when we do.

Diane Vogt O'Connor is the NPS senior archivist, Curatorial Services Division, Washington, DC. She was previously with the Smithsonian Institution Archives.

## Cellulose Nitrate Film Collections Survey

Manufacturers of photographic film used cellulose nitrate as the support for the photographic emulsion from 1889 to 1951. Because of its flammable nature, this film poses a risk to staff and other collections. Because nitrate film was the standard for the production of photographic negatives during the early-20th century, it is believed that National Park Service parks, centers, and offices may contain cellulose nitrate film.

Accordingly, the National Park Service has issued Special Directive 93-2, "Preserving NPS Cellulose Nitrate Film Collections." This directive states the NPS policy for preserving cellulose nitrate film and directs parks, centers, and offices to survey all their photographic holdings, including museum collections, library collections, park and administrative files, and division/office photographic files. Results of the survey are to be submitted to the Washington Office, Curatorial Services Division by November 2, 1993.

The survey is designed to document the types, quantities, location, and condition of all cellulose nitrate film held by the Service. The data gathered from this survey will be used to prepare a Servicewide Report that describes the findings and makes recommendations for managing cellulose nitrate film.

> Anthony M. Knapp Staff Curator Curatorial Services Division

## Preservation and Seismic Retrofit of Historic Resources NPS Technical Assistance in the Middle East

## David W. Look

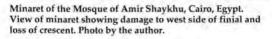
Lona Prieta Earthquake, which lasted only 15 seconds on October 17, 1989, damaged about 490 historic buildings in a seven county area surrounding the San Francisco Bay. Of these, over 20% or about 100, have been demolished and many others are now vacant and abandoned. The damage from this single earthquake for all structures (not just historic ones) is currently estimated at \$10 billion. Just as preventive maintenance costs

much less than deferred maintenance, seismic retrofit costs less because it reduces significantly the amount of damage from an earthquake and also saves countless lives. Unfortunately, once a historic building is damaged by an earthquake, owners frequently use this as their "golden opportunity" to get rid of their historic buildings which they consider "white elephants." Deferred maintenance and disasters are probably the two greatest threats to our cultural resources.

Most historic buildings were built only to take gravity loads. However, like wind, earthquakes apply horizontal forces on structures as well as uplift. Wooden structures usually ride out an earthquake well, even though they may slide off their foundations because they hold together like boxes, but they do less well during hurricanes. Unreinforced masonry (URM) buildings may do better during a hurricane than wooden buildings but behave poorly during an earthquake. URM buildings are vulnerable to localized failure of chimneys, parapets, gable ends, etc., which can lead to catastrophic failure of the building if the earthquake is strong enough or lasts for a long time (for an earthquake that can be 20 secal strengthening to resist the earthquake forces. For wooden buildings it may be as simple as bolting the building down to its foundation. Unfortunately, some wooden sill plates have deteriorated due to dry rot or insect infestation, and this has gone undetected because minimal maintenance or even periodical inspection has not been done. For small, simple URM historic buildings, seismic retrofit usually consists of bracing parapets, bolting roof and floor systems to the masonry so that they do not slip out of their masonry pockets during an earthquake, and anchoring heavy sculpture or other ornaments over entrances to the building to prevent them from falling during an earthquake. Flexible wooden roof and floor systems may also need to be stiffened by adding a diaphragm. For larger or irregularly-shaped (E, H, L, T, U-shaped) historic URM buildings, it may be necessary to design and construct bracing (X or Kshaped) or shear walls to resist horizontal or lateral forces. Special consideration may be necessary for large spaces or tall, thin masonry walls with a small thicknessto-height ratio (slenderness ratio).

The Loma Prieta and other recent moderate earthquakes were only "wake-up calls" to remind us that we

> are vulnerable. They were not the "Big One!" Much more damaging earthquakes are possible and inevitable in the not-so-distant future. Will we be ready for them? Unfortunately, earthquakes are relatively infrequent compared to other disasters (hurricanes, tornadoes, floods, fires, etc.) and, therefore, we have been lulled into a false sense of security. The Plate Tectonic Theory teaches us that the earth's crust consists of large plates that are slowly moving for reasons we do not fully understand. For example, Pinnacles National Park is the western half of an extinct volcano that straddles the San Andreas Fault in California. The eastern half of the volcano crater is 195 miles south on the other side of the fault. It is estimated that it has taken 23 million years for the Pacific and North American plates to move this distance. On an average, the San Andreas moves each year about the same distance that your finger nails grow. If it moved that slowly and evenly, it would not be much of a problem. In 1906, however, it moved 16 to 21 feet in about one minute. Undoubtedly, it can and will happen again. As Sir Bernard Feilding has stated in his book, Between Two Earthquakes, we are



onds or more). Architects and engineers can study a historic structure for months or even years, but an earthquake can find the weakest link in just seconds.

The seismic retrofit of buildings consists of analyzing the building to determine what are its inherent strengths and weaknesses and then designing a system of structuralways between two earthquakes. How will we use this time to prepare?

Recent earthquakes have shown that seismic retrofit does work to reduce or eliminate damage to historic

(Seismic—continued on page 26)



#### (Seismic—continued from page 25)

buildings. The added benefit is that it saves lives. If the \$10 billion had been spent on seismic retrofit **before** the Loma Prieta Earthquake, not only would there have been much, much less damage but many of the 65 people that died might have survived. Whether it is regular maintenance or seismic retrofit, we either pay less now or pay much more later.

In 1980, most preservationists believed that seismic retrofit was too destructive to historic buildings because it frequently results in a loss of historic character and/or fabric. In 1984, the WRO co-sponsored with several other preservation organizations its first conference on the Seismic Retrofit of Historic Buildings. The purpose of this conference was to look at the state-ofthe-art of seismic retrofit. In 1991, the WRO sponsored a second conference with over 30 co-sponsors which focused on evaluating alternative proposed seismic retrofit solutions to determine the least destructive method(s) for a particular historic building. The proceedings from these two conferences (edited by the author) have a number of case studies, a glossary, a bibliography, and other useful references and are available from the Western Chapter of the Association for Preservation Technology.

In 1992, I was invited to serve on a joint U.S.-Turkey team studying the preservation and seismic retrofit of two historic monuments. A symposium was organized by the U.S. Army Corps of Engineers' Waterways Experimental Station (WES) and funded by the National Science Foundation (NSF). At the symposium in Istanbul, May 31-June 2, 1992, I presented a paper on "Preservation on the Pacific Rim" which focused on sensitivity to the historic character and fabric when retrofitting for seismic loads. My paper stated that there are numerous technological approaches to seismic strengthening. No one approach is always better than any others. An approach that may be very sensitive to one historic resource may be very destructive to another. The development and evaluation of alternative solutions was emphasized. I also stressed the need for historic structure reports compiled by interdisciplinary teams that follow the project through to completion and are involved in the decisionmaking process.

On October 12, 1992, a moderate earthquake, only 5.9 magnitude on the Richter Scale, 30 kilometers southwest of Cairo, Egypt, caused at least 530 deaths, 3,500 injuries, and 5,500 damaged or destroyed buildings. Early reports observed damage to the minarets and domes of historic mosques. In response to a call for assistance from the Egyptian Antiquities Organization, a small committee organized by WES and funded by the NSF was selected to do damage assessment. The committee consisted of Team Leader David W. Sykora, geotechnical engineer, Earthquake Engineering and Seismology Branch, Geotechnical Laboratory, WES; Prof. Giorgio Croci, structural engineer, Department of Civil Engineering, University of Rome, Italy; Dr. Erhan Karaesmen and Dr. Ergin Karaesmen, both civil engineers from PARLAR Research Institute, Middle East Technical University, Ankara, Turkey; Tamer Kafafi, civil engineer, U.S. Army Corps of Engineers, Cairo, Egypt; and myself. We inspected 29 Coptic and Islamic Monuments between October 26 and November 5. Our report will soon be published. Highlights of our observations were given at a conference sponsored by the American Research Center in Egypt (ARCE) and other organizations at Johns Hopkins University, April 23-25, 1993, and at the University of Cairo, June 12-15, 1993. Mr. Sykora and I represented the team. We reported that the damage caused by this moderate earthquake was exacerbated by 40 years of deferred maintenance and an artificially high water table caused by leaking water and sewer pipes. None of the monuments recently restored had received any seismic retrofit strengthening, and the ones visited by the team had observable earthquake damage. Now additional damage will be done to these buildings to install seismic retrofit. Some of the earthquake damage and some of the seismic installation demolition could have been avoided if seismic retrofit had been incorporated into the earlier restoration.

We will not be judged by how much knowledge we have, but how we have used that knowledge to preserve our irreplaceable cultural heritage and to prepare for future disasters. Recent earthquakes have shown that buildings retrofitted for seismic loads survive better than those that have not been retrofitted. Regular maintenance and seismic retrofit go hand-in-hand. It makes no sense to brace a parapet back to a roof structure that is about to collapse from its own weight or to allow seismic anchors to be consumed by rust. The currently available methods of seismic retrofit are effective. By evaluating alternative solutions we can determine the method(s) that are the most sensitive to a particular cultural resource. Every method of seismic retrofit is somewhat destructive to the historic character and/or fabric of a cultural resource, but it makes sense to study the resource and make a rational decision as to how and where to strengthen the building rather than leave the fate of the resource at risk. In the future, we may have better methods of retrofitting buildings; however, if we wait until then, we are taking an enormous risk because in the meantime, even moderate earthquakes will damage and destroy hundreds or thousands of our historic sites and cause hundreds or thousands of deaths.

David W. Look, AIA, is chief of the Preservation Assistance Branch, Division of National Register Programs, Western Regional Office, National Park Service. After the Loma Prieta earthquake, Mr. Look was on a joint NPS-California SHPO damage assessment team. Mr. Look has also inspected damage to cultural resources caused by the Whittier Earthquake (California), Sierra Madre Earthquake (California), Mt. Angel Earthquake (Oregon), Hurricane Iniki (Hawaii), Typhoon Russ (Guam), and Super Typhoon Gay (Marshall Islands).

## The Vietnam Veterans Memorial Collection

## **Pamela Beth West**

Who would have thought of the general public as curators of a major museum collection—curators whose job is to chose objects which will be placed in a collection that will be preserved and interpreted in perpetuity? This is exactly what has happened at the Vietnam Veterans Memorial in Washington, DC, when the public began leaving "things" which later became known as memorabilia. These "things" do not fit the standard definition of an artifact or historical object, which are terms used to describe something over 50 years old. But whether they fit the definition or not, this was the start of one of the most interesting collections that the National Park Service would deal with in the 1980s and 1990s.

The phenomena of leaving "things" is reported to have started when someone dropped a purple heart ribbon in the concrete as the wall on which the panels would be mounted was being poured. It continued throughout the first two years of construction and by the time the memorial was dedicated on Veterans Day, November 11, 1984, leaving objects at the Memorial had gained momentum. Many of these objects were picked up by the public, but others were collected by the maintenance and ranger staff. Media attention to this phenomena focused our thoughts on how to deal with these things. We decided to keep them and store them at MARS (the Museum and Archeological Regional Storage facility in the National Capital Region). The first group of memorabilia sent to MARS numbered 554 objects and included objects left during the first two years. The most recent count is 25,000 objects.

Since 1984, we have continued to set museum precedent for modern documentary collections while deciding what to do with these things that the public was leaving. Our first step was to decide what type of accountability these objects fell under and once that was determined, how we would deal with them. Our solicitors determined that they were abandoned property and should be held for 30 days. After the 30-day period expired, we could take them into the regular property system or the museum property system. We chose to take them into the museum property system.

After several years of studying different ways to handle this collection, we have arrived at a solution that is workable for both the MARS staff and the park. Objects are collected and inventoried each night by park rangers who work for National Capital Parks Central. This is the park that oversees the National Mall as well as the monuments and memorials in the District of Columbia area. A curator from MARS then picks up the things and delivers them to MARS. Once they arrive at MARS, they are treated as part of a historic collection, where they are cataloged and placed in storage, as if they were extremely old and valuable.

The public brings not only the customary things that are left at other war memorials such as flowers and flags,



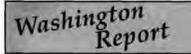
Portion of Vietnam Veterans Memorial Collection exhibit at the Smithsonian's Museum of American History.

but objects that are traditionally handed down from generation to generation such as medals, uniforms, dog tags and other military-related material of war. They also leave letters, photographs, plaques and other similar items that have been purposely prepared with the intent to leave them at the Wall.

In the beginning, people did not know that the National Park Service would save this material, but they left it anyway. Mothers and fathers left teddy bears and favorite pictures of their children. They left birthday cards, Christmas trees, and letters and poems to their loved ones who were lost in this war. Objects have also been left by individuals from foreign countries as well as from our own citizens who now use the Memorial to register their protest against many current social and political issues. While these objects are not usually Vietnam related, they are kept in the collection as part of the offerings left at the Memorial—a wall to which people feel drawn and a wall which is used to express their thoughts.

In October 1992, an exhibit opened at the Smithsonian Institution that put these objects on view for the first time. The exhibit has been extremely popular and was extended through June 1994. There are over 1,000 objects on display with many of them being service related such as military patches, dog tags, and service bars. Other objects are things of a more personal nature such as photographs, letters and teddy bears. We have tried to include objects that are representative of the different types of objects that are now part of the collection. It is our hope that this exhibit will also be able to share with the public the depth of this collection and the effect that the Memorial has had on the world. As with the objects left at the Memorial, every visitor to this exhibit will bring their experiences with them. These unique experiences will make the exhibit unique for each person. The sharing of these individual experiences with others viewing the exhibit will recreate a similar effect that the Memorial has had on its visitors. Future exhibits are planned in other cities to allow people who do not visit Washington to see this collection.

Pamela Beth West is the chief, Division of Curatorial and Museum Services, National Capital Region, National Park Service.



## Capitol Contact

#### Bruce Craig

On January 5, 1993, some 110 new members of the House of Representatives and 13 new United States Senators joined scores of more experienced lawmakers and opened the 103rd Congress. With the inauguration of President Bill Clinton, the first Democratic Administration in 12 years has brought renewed hope and new challenges for the cultural resource community. Although both Representative Bruce Vento and Senator Dale Bumpers reassumed their duties as the respective chairs of the House and Senate national park authorizing committees, there are many new faces on the committees of both the House and Senate. The House committee has also changed its name. The old Committee on Interior and Insular Affairs is now known as the Committee on Natural Resources with Bruce Vento's old Subcommittee on National Parks and Public Lands now renamed the Subcommittee on National Parks, Forests and Public Lands. These are more consistent with their Senate counterparts.

In part, because the new Administration is still placing new faces at old desks at Interior and in key positions in the National Park Service, Congress has focused much of its attention on political appointees' confirmation hearings and on the annual appropriations hearings. Action is likely to concentrate on some hold-over legislative initiatives that did not move last Congress, but have been reintroduced and assigned new tracking numbers: for example, Andrew Johnson National Historic Site, TN (authorizing legislation)-H.R. 310; a boundary expansion at Women's Rights National Historical Park, NY-H.R. 359; addition of the Truman farm to Harry S Truman National Historic Site, MO-H.R. 486 and S. 845; a bill to establish a Wounded Knee National Memorial, SD-S. 278; a bill to expand the boundaries of Fort Necessity, PA-S.523; and two identical bills that seek to establish a Hudson River Artists National Historical Park in the Hudson River Valley of New York-H.R. 803 and S. 112. One legislative initiative-a study of Revere Beach in Massachusetts which was vetoed by President Bush last Congress-has also been reintroduced as H.R. 1739 and S. 796 and will have to pass through the entire legislative hearing process again this Congress.

Several new legislative initiatives have also been introduced, including a major new proposal that emerged as a citizens response to a National Park Service study of the Civil War battlefields of the Shenandoah Valley of Virginia. After nearly a year of public meetings and consultation with scores of landowners, preservationists, and county officials, Congressman Frank Wolf introduced on February 2, 1993, his Shenandoah Valley National Battlefields and Commission legislation-H.R. 746. Based on the results of a Congressionally-mandated Park Service study, this bill seeks to establish a new Civil War battlefield park comprised of a dozen or so sites in the breadbasket of the Confederacy. Senators John Warner (R-VA) and Chuck Robb (D-VA) introduced companion legislation in the Senate (S. 1033). Many observers believe that should some variation of this legislation be enacted this Congress, it is likely to be the final Civil War battlefield added to the national park system as the actions in the Valley represent the last major campaigns not already represented in some form in the system.

Thus far only two pieces of legislation relating to cultural resources have been enacted into law: P.L. 103-25, a minor boundary revision to the George Washington Birthplace National Monument, VA; and P.L. 103-26, legislation seeking to revitalize and rehabilitate the Fort Hancock unit of Sandy Hook (NJ) at Gateway National Recreation Area.

If you have an interest in any of the public laws or legislative initiatives mentioned above, drop me a note at National Parks and Conservation Association (NPCA), 1776 Massachusetts Avenue, NW, Suite 200, Washington, DC 20036.

#### Interior Department Standards for Managing Museum Property

#### Ronald C. Wilson

On January 8, 1993, the Department of the Interior issued standards for Museum Property Management. Part 411 of the Interior Departmental Manual (411 DM) provides a comprehensive compilation of Department of the Interior standards, policies, procedures, and reports required to preserve, protect, document, and account for museum property for which the Department's bureaus and offices are responsible.

The effort to produce and compile these standards grew from a 1990 Inspector General audit report that noted lack of accountability for museum property in several Interior bureaus. The Department asked the National Park Service to coordinate a Departmentwide effort to correct the problems identified. A task force composed of representatives of all bureaus in the Department was formed in 1991, and deliberated for more than a year to produce the standards and policies in 411 DM. The Task Force, chaired by NPS Chief Curator Ann Hitchcock, adapted existing NPS guidance, such as the NPS *Museum Handbook*, Part I and Part II, and built on personal property management regulations in Part 410 of the *Departmental Manual*.

In December 1991, the Task Force completed the first Departmentwide survey of museum property: 37 million objects and 12,000 linear feet of documents were reported at 774 Interior locations. and an additional 32 million Interior objects were reported in non-federal repositories. A Checklist completed in April 1992 evaluated existing conditions against proposed standards, and discovered significant deficiencies. These data provided the basis for Departmentwide planning to correct deficiencies.

The issuance of Departmentwide standards in the three chapters of 411 DM points the direction for bureau planning in the area of museum property management. Through policy promulgated in Chapter 1 of 411 DM, "the Department will ensure the preservation, protection, and documentation of museum property to facilitate resource management, research, interpretation, and accountability, and to ensure that museum property and associated information are available for present and future use."

Standards required for long-term survival of museum property are defined in Chapter 2. Standards are provided for planning, housing, protecting, and monitoring museum property, including museum property displayed in administrative office space. Chapter 2 also provides documentation standards and assigns priorities for implementing museum property management standards.

Mandatory preservation, protection, and documentation procedures and reports for museum property management are described in Chapter 3. Reports required include the annual Museum Property Survey Report and the Checklist Report on the Preservation, Protection, and Documentation of Museum Property, which is to be completed every four years beginning in 1996. Annual inventory reconciliation and certification are also required.

Because Departmental standards were based on NPS documents, requirements of 411 DM are, in most cases, consistent with standards already recognized in NPS Museum Handbooks and other NPS guidance. Some adjustments are being made, however. NPS Special Directive 80-1 is being revised to incorporate documentation standards, and to address the special circumstances of museum property displayed in administrative office space. Development of 411 DM coincided with revision of NPS Museum Handbook, Part II, Museum Records. The revised draft of Part II includes changes in lending and deaccessioning procedures, and is currently undergoing field review.

NPS has been working for several years to implement museum collections management standards throughout the Service. With NPS collections at 324 parks totaling 28 million objects and 11,800 linear feet of archival documents, half the Departmental total, the challenge of full compliance will extend into the 21st century.

NPS curatorial staff in Washington are working closely with the Department's Office of Acquisition and Property Management to provide coordination and technical support throughout the Department to facilitate implementation of 411 DM requirements.

For more information, contact Ron Wilson, staff curator, Curatorial Services Division, National Park Service, P.O. Box 37127, Washington, DC 20013-7127; 202-523-0268.

Viewpoint

## Cultural Resources and National Parks: A Mandate for Heritage Education

#### Billy G. Garrett

We of the National Park Service are both stewards and storytellers. As stewards, we slow the ravages of rust and rot and infestation; as storytellers, we unlock the silence of chipped stone, notched logs, and yellowed paper. The stories tell of our origins, our struggles, and our heroes. They are a gift from the past to the present: an explanation and celebration of the American tradition for young and old, citizens and foreign visitors.

Stewardship and storytelling are universal human activities. Every society has ways of ensuring that its traditions are passed on from one generation to the next. The process is essential to the realization of civic order and individual wellbeing. It is instrumental to learning basic values, practical knowledge, and appropriate behavior. It is complementary to group identity, social justice, and the peaceful resolution of conflict. In our society we may speak of stewardship in terms of conservation or historic preservation; in turn, we may speak of storytelling in terms of interpretation or heritage education.

Sacred places and formal rites, national symbols and family heirlooms, public works and folk tales—these are instruments through which the past communicates with the present. In physical form, these instruments are known collectively as cultural resources. Cultural resources are the focus and the substance of historic preservation; equally important, cultural resources provide the impetus and the framework for heritage education. Archeological sites, museum objects and historic structures, cultural landscapes and ethnographic resources—each of these is a resource category; each is also a set of educational tools which in the hands of skilled teachers can nourish the

...the lives of most Americans have been largely unaffected by the cultural resources which are found in national parks.

mind and stimulate the spirit.

The role of the National Park Service in heritage education, our failure to adequately fill this role, and a suggested strategy for correction of this condition are the subject of this paper. Put simply, the National Park Service does not have a heritage education program to match the richness, diversity and significance of its cultural resources. We have gone to great lengths to protect and preserve our patrimony but, with the exception of cursory exposure during family vacations or school trips, the lives of most Americans have been largely unaffected by the cultural resources which are found in national parks. The efforts of the Service in heritage education have been too little, too narrowly conceived, too fragmented.

Absence of a strong heritage education program has had two other noteworthy consequences. First, legally mandated insistence on resource preservation without a clear understanding of the social and cultural benefits generated through heritage education has alienated many of the agency's management and staff. It is not intuitively obvious why scarce dollars and limited time should be spent saving "old buildings, moldy records and broken pots." This same sense of pointlessness has had a similar result among private sector preservationists. Park-based resources cannot be easily tied to pragmatic concerns such as "community revitalization" and they have not been convincingly presented in any more relevant context. As a consequence, public interest in cultural resources has tended to focus on measures such as conservation districts or tax incentives which apply directly to private sector issues. For many private preservation groups better care and interpretation of cultural resources in national parks is simply not a concern.

Disinterest in park-based cultural resources ought to be of grave concern to anyone concerned with preservation, national parks, or the future of this country. The cultural resources in our national parks are important social symbols with the potential to unleash great cultural energy. Social symbols are powerful and pervasive—they can be distorted or misapplied, they can be confining or liberating, but they cannot be ignored. Cultural references inspired the flowering of the Italian Renaissance and justified the horrors of Hitler's Third Reich. They motivated European conquest of the New World and provided a sense of order for the Iroquois Nation.

For the past 200 years our country has been involved in a great political and social experiment. We have sought to balance collective public needs against the rights of individuals, and have pursued aggressive industrial development within the context of an increasingly complex sense of nature. We have struggled with issues of race and religion, science and technology, urban life and country living. The way has been halting and uneven but it has produced a uniquely American legacy. We can point with pride to evidence of our ingenuity and hard work, our charity and compassion, our dedication to justice and freedom of expression. In shame we must acknowledge that too often we have been violent and abusive, bigoted and oppressive. With resolve we now face new challenges in global competition, social services, and environmental protection.

If this country is to remain vital, each generation-whether immigrant or native born-must learn what it is to be an American. If we are to build on our successes—in contexts ranging from local neighborhoods to the global village-each generation must discover, on its own terms, an association with the events which are considered representative of the American ideal. If we are to correct our shortcomings, each generation must understand the causes of our failures and the social framework within which these problems might be resolved. If we are to move ahead, we must know where we are in time and space, and what constellation of ideals we might use to guide our travels.

This process—the definition, integration, and renewal of the American people—is the context within which management of cultural resources by the National Park Service should be evaluated, developed and executed.

This process—the definition, integration, and renewal of the American people—is the context within which management of cultural resources by the National Park Service should be evaluated, developed and executed. Given the richness of our culturally diverse population, the shifting nature of international affairs, and the emergence of ecological ethics this is an exceedingly complex, but excit-

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### (Viewpoint—continued from page 29)

ing challenge. It is a challenge grounded in the nature of cultural resources as embodiments of events, ideas and values. It is a challenge rooted in the nature of social processes and of the role played by cultural resources in social and cultural renewal.

In spite of this mandate, National Park Service management of cultural resources has fallen short of the mark. Too often,

Not often enough have cultural resources been cherished, by staff and visitor alike, as lasting sources of inspiration, identity, and understanding.

cultural resources have been represented as well-photographed building details or backdrops for battlefield reenactment. Too often, cultural resources have been spruced up for historical celebrations and then forgotten. In too few cases have cultural resources been used to teach lessons in economic development, creative endeavors, or social change. Not often enough have cultural resources been cherished, by staff and visitor alike, as lasting sources of inspiration, identity, and understanding.

The irony in this situation is that those involved in management and preservation of cultural resources have, for the most part, accepted the premise that preservation efforts should minimize the loss of historic material and lessen the impact of modern change. This principle is closely linked to the assumption that people are better able to grasp the essence of the past when they can directly sense its physical evidence. In other words, exposure to a real cultural artifact offers different types of stimulation than does exposure to copies of that artifact or to texts which discuss or describe that artifact. This idea holds whether the resource is looked at in the context of science or the humanities, by lay people or specialists.

Recognition of the inherent value of cultural resources and of the stewardship activities needed to protect those values is at the heart of the National Historic Preservation Act of 1966. The act, which laid the modern foundation for cultural resource management, expanded our concern with cultural resources beyond properties of national importance to places of state or local significance; it created a basic partnership between the states and federal government in administration of the program; and, it established a clear mandate for the National Park Service to oversee the program and to exemplify its principles in day-to-day operations. Most important, it called for review and comment on Federal undertakings to ensure that cultural resources were not adversely effected.

Responsibility for cultural resources was not new to the Service in 1966. Fifty years earlier, the National Park Service Organic Act had established that the purpose of national parks

"...is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

The cultural resource aspect of this mandate has extended protection to Mississippian mounds and 18th century wharfs, presidential homes and public gardens, artists studios and Civil War battlefields. Most of the major themes in the history of American arts and industry education and commerce, science and social movements are represented by cultural resources in national parks. Some of these resources are of national significance; others have more localized associations. Looked at solely in numerical terms, the commitment of the National Park Service to cultural resources is truly impressive. Units of the national park system contain approximately 443,000 archeological sites, 28,000,000 museum objects, 25,000 historic structures, and hundreds of cultural landscapes. Fifty-seven percent of all parks in the national system were established for the principal purpose of preserving cultural resources.

...it is puzzling to consider the current disconnection between national parks and cultural resources.

Given a clear legal mandate emphasizing protection of cultural resources and the immense body of cultural resources under its stewardship, it is puzzling to consider the current disconnection between national parks and cultural resources. For sake of illustration, consider the posters and tee-shirts advertised in National Parks magazine. Here, in beautifully graphic terms, national parks are unmistakably equated with wildlife, natural vistas and native plants. Another example of this same line of thought is present in the recommendations of the National Research Council regarding science in the parks. Again, national parks are equated with natural phenomena. Occasional references are made to prehistoric cliff dwellings or the potential application of sociology to visitor use studies, but cultural resources, as a whole, and their support disciplines are essentially invisible.

This muted, almost indifferent, attitude toward cultural resources was pointedly evident at the Vail Symposium in October 1991. Convened as the climax to the 75th anniversary celebration of the National Park Service, the symposium brought to conclusion a year-long examination of the agency, its problems and its potentials. Cultural resources were woven into the proceedings from start to finish, particularly in sessions focused on resource management and environmental leadership. But as the discussions progressed and work groups finalized their recommendations, it was obvious that cultural resources were not central to any of the proposed initiatives. This downplay of cultural resources has continued into the present as the Vail Agenda moves into implementation.

The secondary role of cultural resources in national parks was reinforced in other ways at Vail. Most important, because of their typical eloquence, were the distinguished people who spoke at every plenary session. Neither by virtue of their respective backgrounds nor by the substance of their comments did these politicians, businessmen, and scholars elevate the value of cultural resources in national parks. In address after address, these individuals gave colorful, personal accounts of hiking and camping adventures; as for moving encounters with cultural resources in national parks, they had nothing to say. And between the speeches, there was sensuous New Age music based largely on natural themes.

The bias evident in the Vail Symposium is easily explained by the fact that national parks are currently dominated by concerns with natural processes and natural phenomena. Biodiversity and ecosystem definition, protection of endangered species and monitoring of air quality-these topics typify new frontiers in park management. Prodded by well organized environmental groups, supported by broad public interest, the Service has stepped forward to take a prominent role in the "green" revolution. Everything from planning to pest management has been framed in ecological terms. Parks have been recast as environmental laboratories, the explicit use of scientists as park managers is being debated, and expanded funding for scientific research in parks is under consideration. Under the rubric of "sustainable" design, even new park development has a holistic, environmental bias

In spite of this emphasis on natural resources, the cultural resources program has been making steady progress of its own. Increased funding has been secured for stabilization of endangered historic structures, the backlog of uncataloged museum objects has been greatly reduced, guidelines for the identification and protection of cultural landscapes are being developed, extensive areas have been surveyed for archeological resources, and discussions have been initiated with Native American groups about resources that are significant within their own respective cultural systems.

Without doubt, the cultural resource program is in many respects both vital and successful; but it is also out of balance. It is out of balance because it has focused almost exclusively on bureaucratic and quantitative issues—how many cultural resources do we have, what type of resources are they, and what are their

If cultural resources are to be preserved in order to better tell the story of America, then we must get on with telling that story—in all its aspects, of all its people.

various states of deterioration. Support for public outreach and exploration of the educational potential inherent in cultural resources has been very limited. The resultant emphasis on stewardship has cast cultural resources as either impediments to park development or as things to be protected at all costs. Preservation has become an end in itself, for better or worse.

If cultural resource management is to transcend its current self-serving agenda, the objective of the program must be clearly laid out and aggressively pursued. If cultural resources are to be preserved in order to better tell the story of America, then we must get on with telling that story-in all its aspects, of all its people. It is high time that the word pictures of O'Neill and Sandburg were used to enliven literacy programs, that discussions about environmental change were illuminated with evidence from Reef Bay and Mesa Verde, that information about the Saugus Iron Works and the Wright Brothers were added to debates about industrial development and innovation. If the strength of support for natural resources is based on an "environmental crisis," how much more support should cultural resources be given with the multitude of social problems we face every day?

Revitalization of the cultural resource program through the addition of a heritage education initiative will require action on three fronts. First, a broad policy paper is needed to outline a basic educational model for use of cultural resources, to identify special opportunities in heritage education for the National Park Service, and to suggest potential partnerships outside the federal government. Second, managers throughout the national park system should be encouraged to set up pilot projects using cultural resources within their jurisdictions for the explicit purpose of developing ethics, cognitive skills and practical information. Third, information about innovative heritage education projects like "Teaching

with Historic Places" and "Keepers of the Treasures" should be widely distributed. As a way to kick off the initiative, the Service might consider calling for a national conference on heritage education, organized around the preceding topics and focused on the problem of defining values in a culturally diverse society.

Clearly, the National Park Service cannot approach such an endeavor in isolation. Our outreach should extend beyond park boundaries to other levels of government, business and industry, schools and other cultural institutions. But most important, all aspect of the heritage education program should actively involve interested citizens, neighboring communities and effected ethnic groups. The reason for this involvement is simple: identification and interpretation of basic values, relevant skills and worthwhile knowledge should not be the exclusive domain of the federal government. Our role in heritage education should be that of a facilitator. Our primary concern should be to engage people in dialogue, to encourage intellectual struggle, to help people find their commonalities as well as their unique qualities. This effort, in itself, is a central part of the American legacy and an essential skill in perpetuating the democratic process.

Development of a heritage education program will not be easy. Traditional resource management activities such as survey, inventory and conservation must remain strong if we are to serve as responsible stewards. In addition, leadership and support will be essential if the new program is to overcome institutional inertia, address staffing requirements, and secure needed financing.

Perhaps most important, revitalization of the cultural resource program must not be seen as a challenge to natural resource interests. National parks encompass both resource types and both programs should be strong. Indeed, to the extent that national parks are themselves one of the most notable creations of the American experiment, heritage education can provide an invaluable perspective on the development of environmental concepts and management policy within these preserves.

In conclusion, if we are patient and diligent in our efforts, the potential inherent in park-based cultural resources will eventually be unleashed. Imagine a heritage education program which takes national parks into millions of homes every month by way of a magazine like the *Smithsonian*, regular features on National Public Radio, or special programs on MTV. Imagine at least some park visits as part of a structured educational experience made more meaningful by background preparation before each visit, reinforced by a variety of creative projects after each visit, and underpinned by a nationwide system of curriculum guides for heritage education. Imagine an enthusiasm and an understanding so well developed that the people, events and ideas behind park-based cultural resources are popular topics for school

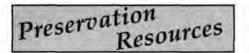
Imagine a heritage education program which takes national parks into millions of homes every month by way of a magazine like the Smithsonian, regular features on National Public Radio, or special programs on MTV.

plays, tee-shirts, video contests, and musical compositions.

At such a time, there will be other organizational watersheds marked by gatherings like the one at Vail. There will be other discussions about the mission of the National Park Service, our strengths, and our opportunities. There will be other work groups and other speakers. And at such a time we might well hear a keynote speaker say something like this:

The cultural resources contained within our national parks are a physical manifestation of the great American story. They are echoes of time immemorial: shouting out in anger at injustice, whispering of hopes and dreams, laying out in measured phrase the ideas which have powered our factories and drawn rich harvest from our soil. They illuminate the background of current events and foster dialogue about the basis for responsible choice. They embrace the lives of both women and men, of every race and faith which has been part of the American odyssey. Through heritage education these resources have transformed national parks into a special kind of classroom; through heritage education these resources have fulfilled their promise as a living testament-a promise born in the unique circumstances of each resource and brought to fulfillment through interaction with each succeeding generation.

Billy Garrett is chief, Falls Church (VA) Office of the Eastern Team, Denver Service Center, National Park Service.



## Publications

### Metals Sourcebook Updated

Initially developed in 1980 by Margot Gayle, David W. Look, AIA, and John G. Waite, *Metals in America's Historic Buildings* was updated in 1992 to reflect the newest technologies. It is intended for use by owners, architects, and building managers responsible for the preservation and maintenance of America's architectural heritage.

To order, indicate stock number (024-005-01108-1) and together with a check for \$10.00 (made payable to Superintendent of Documents), mail to Superintendent of Documents, Government Printing Office, Washington, DC 20402-9325. International customers add 25%.

### Secretary of the Interior's Guidelines

Designed to enhance overall understanding of basic preservation principles, The Secretary of the Interior's Standards & Illustrated Guidelines for Rehabilitation includes the revised 1990 Standards for Rehabilitation together with the familiar "recommended" and "not recommended" approaches and treatments.

Never before offered in an illustrated version, the new book contains over 150 photographs and drawings that emphasize repair over replacement and limited rather than wholesale change to accommodate new uses. To order, list GPO Stock Number (024-005-01091-2) and include a check for \$8.00. Mail to Superintendent of Documents, Government Printing Office, Washington, DC 20402-9325.

### **SAH Buildings Series**

The Society of Architectural Historians (SAH) has produced a publication series entitled Buildings of the United States. There are 55 volumes on American architecture compiled and written on a stateby-state basis. The primary objective of the series is to identify and celebrate the rich cultural, economic, and geographical diversity of the United States as it is reflected in the architecture of each state. The series has been commissioned by the Society of Architectural Historians, an organization devoted to the study, interpretation, and preservation of the built environment throughout the world. To order and for more information, contact Oxford University Press, 200 Madison Avenue, New York, NY 10016; 1-800-451-7556.

## Heritage Education Booklet Available

Heritage Education: A Community-School Partnership, by Kathleen Hunter, discusses the benefits of a heritage education program as an approach to teaching many subjects in the school curriculum. The booklet presents examples of heritage education programs and activities for communities and schools that want to initiate or improve their own heritage education programs. It is the most recent of the National Trust's Information booklets, a series of over 60 publications providing concise information on topics basic to historic preservation. The cost for each Information booklet is \$5.00, including postage and handling. For bulk orders of 10 or more copies, the cost is \$2.50 per copy plus a \$5.00 shipping and handling charge. Orders are shipped prepaid only. Copies are available from Information Series, National Trust for Historic Preservation, 1785 Massachusetts Avenue, NW, Washington, DC 20036; or for more information call 202-673-4000.

### **Potomac Valley Indians**

Commoners, Tribute, and Chiefs, by Stephen R. Potter, University Press of Virginia, 280 pp., \$29.95.

Using an innovative combination of archeology, anthropology, and ethnohistory, Stephen Potter traces the rise of the Chicacoans, whose domain on the south shore of the Potomac straddled the boundary between the Powhatans and the Conoys. By presenting a case study of the Chicacoans from A.D. 200 to the early 17th century, Potter offers readers a window onto the development of Algonquian culture in the Chesapeake and illuminates responses of its constituent societies to the invading Europeans. He examines the stratification of individual chiefdoms into elites and masses of tribute-paying commoners, and he demonstrates the progressive consolidation of Algonquian peoples in the century preceding the European influx.

Stephen Potter is the regional archeologist for the National Capital Region of the National Park Service. Funding for the research of his book came from a Horace M. Albright Employee Development Fund grant awarded by the National Park Foundation and administered by the National Park Service. He received his A.B. degree in anthropology from the University of Missouri at Columbia and his M.A. and Ph.D. in anthropology from the University of North Carolina at Chapel Hill.

To order the book, contact The University Press of Virginia, Box 3608, University Station, Charlottesville, VA 22903; 804-924-3468.

## Bulletin Board

### Call for Papers

The National Council on Public History solicits papers, workshops, and presentations for its March 1994 annual meeting to be held in Sacramento, CA. The theme of the conference is "Public History and the Environment." The program committee invites sessions that reflect the work of public historians in a variety of areas, as well as any other topics of interest to public historians. For more information or to submit your onepage proposal plus a brief resume due by July 1, 1993, contact 1994 Program Committee, c/o Alan S. Newell, Program Chair, HRA, Inc., P.O. Box 7086, Missoula, MT 59807-7086; Phone: 406-721-1958; fax: 406-721-1964.

The Third International Mining History Conference will be held at the Colorado School of Mines in Golden, CO, June 6-10, 1994. The conference will follow the format set in Melbourne, Australia and Bochum, Germany, and will include lectures, tours, and workshops. The main theme of the symposium is "Society and Technology"; lesser themes are "The State and Industry, "Third World Issues," and "Historic Preservation," particularly in Latin America, Australia, and North America. Individuals interested in presenting papers should submit a one-page synopsis of their topic and a one-paragraph vitae. Proposals should be submitted by July 1, 1993, to Robert L. Spude, Conference Coordinator, Mining History Association, P.O. Box 150300, Denver, CO 80215.

The George Wright Society Forum is planning a special issue for publication in 1994 on the preservation and interpretation of historic sites, landscapes, and environments. Essays of approximately 4,000 words from those involved in such activities are invited for consideration. Deadline for submission is November 30, 1993.

The George Wright Society was founded in 1980 to serve as a professional association for people who work in protected areas and on public lands. The Society is not limited to a single discipline or one type of protected area, but cuts across academic fields, agency jurisdictions, and political boundaries. Forum is a quarterly publication for the discussion of timely issues related to protected areas, including think-pieces as well as research-based articles.

Send essays for consideration, or inquires, to the special issue guest editor, (Bulletin—continued on page 35)

# **Reader Survey**

To help us plan future issues of *CRM* and better serve your needs, you are asked to answer the following questions. Please return the survey, along with the mailing list information requested at the end of this form, by August 31.

On a scale of A (Excellent), B (Good), C (Fair), D (Poor), how does CRM rate in the following categories?:

<ul> <li>Selection of topics</li> <li>Timeliness of information</li> <li>Quality of information</li> </ul>	A	В	С	D	
Ouality of information	A	В	C	D	
Quanty of indofination	A	в	C	D	
<ul> <li>Format/arrangement of material</li> </ul>	А	в	C	D	
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## Update our Mailing List

YOUR RESPONSE IS REQUIRED to ensure that you continue to receive *CRM*. Please complete this form and return it to us by **August 31, 1993**. If we have not received your response by this date, we will assume you no longer wish to receive *CRM* and your address will be deleted from the mailing list. Thank you for your cooperation.

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### (Bulletin—continued from page 32)

Dr. William H. Mulligan, Jr., Department of History, Murray State University, Murray, KY 42071-3311; 502-762-2231.

## **National Park Foundation Grants**

Founded in 1967, the National Park Foundation supports the overall enhancement of the national park system. The Foundation provides direct grants, to support park projects, in four primary areas:

- Programs that impact on protection of the parks, through outreach and education, with emphasis on those that reach young people, like Parks as Classrooms;
- Improvements for interpretive facilities and services throughout the national park system;
- Volunteer efforts of the National Park Service—Volunteers in Parks (VIPs), "Friends of" organizations, and other local park support groups;
- Activities that further education, training, and employee development opportunities for National Park Service staff.

Awards generally range from \$3,000 to \$40,000 and most are made directly to the parks. Grants are awarded three times a year. Upcoming application deadlines are October 15, 1993 and February 15, 1994.

For a copy of the application, guidelines, and criteria, call or write the National Park Foundation, 1101 17th St., NW, Suite 1102, Washington, DC 20036; 202-785-4500.

### Sandstone Research

The Architectural Conservation Laboratory of the University of Pennsylvania and the Southwest Region of the National Park Service have recently undertaken research and treatment on the conservation of a weathered calcareous sandstone column at the Convento of Mission San Jose, San Antonio Missions National Historical Park, San Antonio, TX. The project, conducted under a cooperative agreement established in 1992 between the university and the NPS provided practical conservation information and training. Funding was provided by the friends group, Los Compadres de San Antonio Missions National Historical Park who secured a grant from the Marcia & Otto Koehler Foundation. The project was scheduled for completion in May of 1993. Team members for the project included: Frank G. Matero (University of Pennsylvania), Jake Barrow (NPS/Southwest Regional Office), Anne Brackin (University of Pennsylvania), Keith Newlin (NPS/Denver Service

Center) and Diana Motiejuanaite (NPS/ICOMOS Intern). For further information, contact Jake Barrow, National Park Service, Southwest Region, Santa Fe, NM 87504-0728.

## NPS Curatorial Methods Training Program

The National Park Service (NPS) annually conducts a training program titled "Curatorial Methods" at the Stephen T. Mather Employee Development Center, Harpers Ferry, WV. The two-week course is designed to provide staff with the basic knowledge and skills essential to fieldlevel management and care of cultural and natural history museum collections. It is open to NPS permanent full- or parttime museum curators, museum specialists, technicians, and aids; and resource management specialists, interpreters, and others assigned collateral duties in managing park museum collections. Priority is given to park staff who have curatorial responsibilities as a critical element in their performance standards. Participants receive instruction through presentations, hands-on practicums, case studies, and field trips. The next offering of this course is scheduled for October 18-29, 1993.

Course emphasis is on museum object documentation and preventive conservation. Topics covered in this course include: scope of collections; accessioning, cataloging, photographing, inventorying, and deaccessioning museum objects; handling objects; environmental monitoring and control; museum integrated pest management; storage and exhibit planning, procedures, and techniques; museum security, fire protection, and emergency planning; use of museum collections; museum ethics; museum collection issues relevant to the Native American Graves Protection and Repatriation Act (NAGPRA); and planning, programming, and funding a museum collections management program.

As in the past, NPS is interested in inviting professionals from other government agencies and the private sector to nominate employees to attend this course. Non-NPS persons interested in attending this course should take particular note of the following information:

Participants: Any non-NPS employee nominated by his/her organization, who has curatorial responsibilities in their job description. The Mather Employee Development Center may select up to four non-NPS participants.

**Funding:** Tuition for this course is \$50.00 per day (\$500.00 for course). Dormitory fees (\$25.00 per night) will be charged, bringing the cost of the course to approximately \$800.00. Transportation costs to and from the Mather Employee Development Center and meals are in addition to this cost.

Application: A letter of nomination on the organization's letterhead is all that is required to nominate an individual. An announcement about the course is distributed Servicewide two months prior to the scheduled dates of the course. To receive a copy of this announcement, write to Curatorial Methods Course Coordinator, National Park Service, Stephen T, Mather Employee Development Center, P.O. Box 77, Harpers Ferry, WV 25425-0077.

> —Anthony M. Knapp Staff Curator Curatorial Services Division

## Museum Handbook, Part II, Museum Records Out for Field Review

The Museum Handbook, Part II, Museum Records, was distributed to the field in May 1993 for extensive review and comment.

The revised document represents the synthesis of extensive work by the National Catalog Steering Committee and the Archives Committee, several years of ongoing field comment, analysis of National Catalog submissions, evaluations by park curatorial staff at various Servicewide training sessions, and input from archeological centers.

The revised *Handbook* includes two new chapters on outgoing loan and deaccession, each with a new tracking system and set of procedures. Appendix D, Archival and Manuscript Collections has been revised and several new appendices on such topics as copyright and recommended cataloging guidelines have been added. Appropriate sections of the Automated National Catalog System have been incorporated. Several new and revised forms are provided.

The revised chapter format and new index to the *Museum Handbook*, Parts 1 and II, will facilitate access to information. Some major proposed departures from the Museum Handbook, Part II (1984) include open accessions for multiyear field collecting projects, temporary custody status rather than incoming loan status for items left at the park for less than 30 days, and the elimination of phased cataloging where registration data could be completed first, followed by cataloging data at a later date.

Because the document impacts NPS record keeping practices we are asking for a broad review including all regional and selected park curatorial staff and other specialists, e.g. archeologists, natural resources managers and conservators, for comment.

Interested parties wishing to review and comment on the Museum Handbook,

#### (Bulletin—continued from page 35)

Part II, should contact the regional curator. Comments are due back through region, to the Curatorial Services Division by August 6, 1993 in order that the final document be distributed Servicewide this year.

—Joan Bacharach Museum Registrar Curatorial Services Division

### MCN Sets Conference

The Museum Computer Network (MCN) will hold its annual conference November 3-6, 1993, in Seattle, WA.

MCN is a not-for-profit, international organization committed to fostering the cultural aims of museums through the application of computer technology. Founded in 1972, MCN serves professionals and institutions who wish to develop, manage, and convey museum information through the use of automation. It supports cooperative efforts that enable museums to play a more effective role in creating and disseminating cultural and scientific knowledge as represented by their collections and related documentation.

For more information about the conference, or to obtain registration materials, contact Diane Zorich, MCN '93 Program Chair, Peabody Museum of Archaeology and Ethnology, Harvard University, 11 Divinity Avenue, Cambridge, MA 02138; Phone: 617-495-1969; Fax: 617-495-7535.

### Reconstruction Workshop Proceedings

Last year, CRM published several papers on reconstruction, originally presented at a workshop held by Environment Canada in March 1992 (see CRM, Vol. 15, Nos. 5 and 8). Now the Proceedings of the Canadian Parks Service Reconstruction Workshop has been published and is available free of charge, while supplies last.

The issue of reconstruction is one of a number of significant concerns currently being addressed by cultural resource managers. Attending the workshop were some 80 people from across Canada and representing individual historic sites, senior management, and various conservation and interpretation disciplines. Their discussions included how to respond to the popular demand for reconstructed environments and how to deal with "reconstructed" features.

To receive a copy of the Proceedings write to National Historic Sites Publications, Parks Service, Environment Canada, 1600 Liverpool Court, Ottawa, Ontario, Canada K1A 0H3.

#### Georgia Observes Preservation Month

Citizens throughout Georgia joined others around the country in May to celebrate National Historic Preservation Month. The theme, Preservation and Livable Communities: Make the Connection!, emphasized that historic preservation enhances the livability of communities—from large metropolitan cities to small rural farming towns across America. Communities throughout the state highlighted National Register and locally designated historic sites, sponsored school exhibits and programs for children, featured walking and house tours in historic neighborhoods, and



U.S. Department of the Interior National Park Service Cultural Resources P.O. Box 37127 Washington, DC 20013-7127

OFFICIAL BUSINESS PENALTY FOR PRIVATE USE \$300 sponsored lectures and workshops for adults.

## **APT Conference**

The Association for Preservation Technology International's 25th anniversary conference will be held at the Chateau Laurier in Ottawa, Canada from September 29 to October 2, 1993. The conference will bring together architects, engineers, conservators, historians, craftspersons, preservationists and other professionals involved in the maintenance and preservation of built heritage.

With the theme, "Adapting in a Changing World," the conference tackles preservation's newest challenges, with sessions on achieving universal access in historic buildings, resolving environmental and planning issues in the rehabilitation of obsolete institutional and agricultural complexes, conserving modern architecture, and tapping the vast potential of computer technology in the management of historic resources.

Immediately preceding the conference, concurrent training courses from September 26 to 29 deliver intensive, high-level instruction in three areas: Historic Roofing surveys a number of traditional roofing materials and assemblies and explores maintenance, repair, and upgrading strategies; Masonry emphasizes hands-on site work to impart good masonry conservation theory and practice; and a colloquium on Conservation Management addresses real and perceived constraints associated with the management and development of heritage properties within political and corporate frameworks.

For additional information, contact Robert Hunter, APT CAN Conference Chair, at 819-997-6974 or Fax 819-953-4909.

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Cultural Resources Washington, DC



# Local Preservation

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# **ISSUES PAPER: CONSERVATION DISTRICTS**

INTERAGENCY RESOURCES DIVISION, WASHINGTON, D.C.

This is the first in what the Interagency Resources Division of the National Park Service envisions as a number of occasional articles on issues relating to local historic preservation. Published under the banner of the **Local Preservation** series, these articles differ from regular issues of **Local Preservation** by virtue of their focus on current concerns which have yet to be resolved and not on established preservation practice, as is the subject of the articles in the regular series. The intention of the **Issues Paper** format is to stimulate dialogue and encourage new and creative thinking about alternatives in pressing local preservation issues. We are pleased to be able to inaugurate this new format with two articles on conservation areas or districts, by Robert E. Stipe and Carole Zellie respectively.

Although the term has several meanings, conservation areas or districts suggest to many in preservation a method of achieving preservation ends at a neighborhood scale without some of the perceived burdens of the traditional historic district approach. The articles included here broach a number of important issues, among them: definition of conservation districts, consequences of designation as a conservation district (especially with regard to the regulation of alterations and new construction), relationship to existing historic districts, and the administration of conservation districts by local governments.

The article by Robert E. Stipe entitled "Conservation Areas: A New Approach to An Old Problem" presents a somewhat idealized concept of the conservation area as a neighborhood, by virtue of its special qualities, slated to receive coordinated and enhanced attention and service from local government. Mr. Stipe makes the case against including regulatory controls in the conservation area designation by arguing that to do so would deprive preservation of an important "carrot" to be used when the "stick" of the traditional historic district may not be appropriate. Carole Zellie's article, "A Consideration of Conservation Districts and Preservation Planning: Notes from St. Paul, Minnesota," presents the results of her study of 20 conservation districts in place around the country. The analysis was conducted at the behest of the Minnesota State Historic Preservation Office and the St. Paul Heritage Preservation Commission. Ms. Zellie finds that the conservation district approach, as it is currently implemented, can be characterized in two ways: those having a neighborhood planning focus and those with architectural or historic preservation aims. The author concludes that, in certain circumstances, conservation districts can be a useful complement to traditional historic districts. However, she warns against dismissing the design review component entirely by making the case that design review is critical in neighborhoods in which the housing stock has suffered from unsympathetic alteration.

The articles in this **Issues Paper** reflect the still evolving nature of the conservation district concept and its place in the preservation tool kit. This publication aims to assist local preservationists in evaluating the usefulness of conservation districts by highlighting multiple perspectives on the issue.

Stephen A. Morris, Editor, Local Preservation series, July 1993

# CONSERVATION AREAS: A NEW APPROACH TO AN OLD PROBLEM

by

# Robert E. Stipe Emeritus Professor of Design School of Design, N.C. State University

Ever since the first Old and Historic District was established in Charleston, South Carolina in 1931, American communities have relied heavily on local historic district regulations for the protection of neighborhoods of distinguished architectural and historic character. Presently there are approximately 2,000 such districts in the United States, and their number has roughly doubled each decade since the 1930s.

That this approach has proved its worth time and time again is beyond dispute, notwithstanding occasional difficulties encountered in the processes of administration and enforcement. But times have changed. Good planning and modern preservation philosophy, as well as an increasingly conservative public mood that is increasingly anti-regulation, suggest that it is time to supplement this traditional regulatory stick with a pro-active carrot. For descriptive purposes, this might be called the "conservation area" technique.

Discussion of the overall concept of conservation areas, which is the subject of this essay, is complicated somewhat by the fact that several dozen cities across the county have already designated areas called conservation areas or districts, each slightly different from the others. Whatever called, and for reasons discussed later, these are for the most part more closely related to the traditional historic district than to the concept of a conservation area as defined here.

The need for a supplemental approach springs partly from new thinking about the inherent value of neighborhoods and their associative values to both residents and the larger community, and partly from strategic necessity.

Preserving neighborhoods, historic and near-historic, takes on special significance in today's changed political climate. The designation of a local historic district, whether through zoning or some other source of authority, is a vexing issue for elected officials in many cities and towns. Historic district ordinances require all property owners within a proposed district to comply with a police power regulation that carries with it both criminal and civil penalties for violation. They are also seen as regulating "taste" through the review of proposed additions or new construction. Mistakenly or not, the process is often perceived as government interference with individual rights of free speech and the unfettered use of private property. Thus, the local political sieve through which additional regulations must be filtered is an increasingly difficult one.

The conservation area approach -- and the term "area" is used here throughout to make clear that ideally it is not a special kind of zoning district -- offers a number of distinct advantages. It fits well with contemporary thinking about what is worth preserving. It is more susceptible to local definition, more flexible in interpretation, and less threatening or restrictive to the average property owner. The conservation area approach melds easily with contemporary local planning processes and administrative structures; and, most important, admits to the evaluation process additional associative values, including human ones, without demeaning history or architecture.

# What Is A Conservation Area ?

In the best use of the term, the ideal conservation area is one that is crisply, if broadly, defined and easily distinguished from the traditional historic district. A working definition which originated in North Carolina more than a decade ago, defines a conservation area as one that "possesses form, character, and visual qualities derived from arrangements or combinations of topography, vegetation, space, scenic vistas, architecture, appurtenant features, or places of natural or cultural significance, that create an image of stability, comfort, local identity, and livable atmosphere."

This definition goes considerably beyond the defining element of a traditional historic district. The customary associative values, which focus on history and architecture and which stress the stylistic and material integrity of the place and its component parts, have broadened considerably. While architecture and its appurtenant features remain as explicitly enumerated values, history as such is expanded to take in the generically broader concept of culture. The form, character, and visual quality of the streetscape and landscape, as the staging area for architectural elements, predominates. Natural areas and landscapes are added to emphasize a special concern for a broader range of environmental considerations. Vernacular elements, now widely fashionable among preservationists, are also implicitly recognized as respectable associative values, as are aesthetics and spatial structure. Age, as such, is not a major consideration. Because the definition tends overall to place relatively greater importance on the preservation of a natural larger landscape, the word "conservation" seems a more apt descriptor than does "preservation."

Most important, it is the presence of any one of these values or several of them in combination leading to "an image of stability, comfort, local identity and livable atmosphere" that takes center stage. Thus, integrity is replaced by imagery, and the values and perceptions of local citizens are weighted equally with the academic and scholarly credentials of experts.

It is also useful to define this ideal conservation area in terms of what it is not. Unlike zoning historic districts, exemplary conservation areas are not regulatory in nature. While there are criteria by which they might be defined, they do not establish or even attempt to establish additional regulations above and beyond those that already exist. And the burden imposed by conservation area designation lies most heavily on the local government itself -- the mayor, manager, council, planning staff and several line and staff agencies of the city government -- rather than upon individual property owners. In other words, the ideal conservation area becomes a device by which a city or county imposes upon itself a special responsibility to undertake ambitious, specifically defined planning and design tasks targeted to the maintenance and improvement of the area so designated. From the standpoint of the property owner, conservation area designation thus becomes a carrot, rather than a stick.

# What Kinds of Areas Might be Designated ?

In theory, there are three kinds of areas or neighborhoods to which the designation might appropriately be attached.

First, the designation would be appropriate for those areas surrounding or bordering on an existing local historic district. In this sense, conservation areas might be regarded in customary planning parlance as "buffers," or transitional areas designed to protect the edges of an existing district.

Second, the conservation area approach would be highly appropriate as a tool to protect what might be called "pre-natal" historic districts that don't yet meet the usual 50-year rule or which have not yet acquired the patina of age or character associated with the traditional district, but which skilled observers feel certain will qualify in perhaps 5 or 10 years. Conservation area designation would thus provide incentives to the private sector to protect and maintain a maturing but not-yet-ripe historic district of the traditional kind.

Third, the designation would be appropriate for areas or neighborhoods that while they might never qualify for "historic" status, are important to preserve and maintain solely for their social and economic value, or for their utility as affordable housing. It is important to stress that regardless of motivation, the limits of the utility of the concept are local imagination and creativity.

# How is a Conservation Area Established?

Like a zoning historic district, the model conservation area is defined by precise boundaries shown on a map. Here the similarity to the traditional historic district ends. Since the designation of conservation areas does not impose on property owners any regulatory burdens other than those already in effect, the mapping and designation of conservation areas would best be accomplished by a resolution of the governing board as a policy directive, rather than by an ordinance. Designation might, of course, be accomplished through an executive order of the mayor or city manager, but this would not normally carry the political clout of a mandate from an elected board.

#### What Would Be the Consequences of Designation?

For the property owner, conservation area designation would have little impact insofar as restrictions or costly maintenance obligations are concerned. Although existing land use regulations would remain in effect, as would private deed restrictions of one kind and another, there would be no architectural review of additions or new construction, and there would be no restrictions on demolition. The impact of conservation area designation would fall primarily on public agencies and upon the city itself.

The designation resolution or order would simply state, as a finding of fact, that the area was one of special interest deemed desirable and necessary to conserve for present and future owners, and to that end it would direct various local government agencies to undertake a number of activities:

 to prepare or update, as appropriate, land use, transportation, public utilities, public facilities, housing, open space, historic preservation, urban design and other comprehensive plan elements for the area being designated;

 as part of such planning, to have special regard for and to give special attention to the design, construction and maintenance needs of public thoroughfares, pedestrian ways, open spaces, landscape elements (including street trees), recreation areas and comparable amenities of the area, and to prepare detailed plans, designs, sketches and models proposing public improvement of these facilities and areas;

 to prepare special and detailed recommendations with respect to improved housing, education, employment, health, protective and other human resource requirements of the area designated;

 to establish appropriate means of communication between and among the public authorities involved, and provide for the active participation by residents of the area in the preparation of plan elements and program elements noted above;

• to designate a responsible local government official to coordinate these activities, both from an inter-governmental and an intra-governmental standpoint;

• to recommend to the manager and council, by a date certain, ways and means by which the local government should step up its maintenance and operating programs within conservation areas;

 to recommend to the governing board specific changes or additions to both the annual operating and capital budget programs of the local government for implementing the plans and programs suggested for the conservation area; and

 to insure that no local government program of any kind resulted in adverse impacts on a designated conservation area.

The activities listed above are not an exclusive list of activities that should be included in a conservation area program. Such a list would vary according to the special problems and needs of each such area. The council should, of course, provide the necessary financial resources for the additional planning, design and other studies to be carried out in designated conservation areas. Target dates for the completion of individual tasks might be specified.

The main burden of implementing the council's mandate would fall upon the local planning, historic preservation, housing and renewal agencies. Other operating programs of the city, such as public works, parks and recreation, engineering, health and human services, etc., would also be involved. Depending on the organizational structure of the city, the city manager and/or mayor would be major players in the implementation process. In effect, designation as a conservation area would serve to force a variety of public officials and agencies, most of whom normally work in isolation from one another, to come together in a coordinated and energetic way, to focus their attention on the special character of designated areas.

# Should There Be Some Modest Additional Regulations in a Conservation Area?

Whether or not to impose regulatory restraints in a conservation area, such as one prohibiting the demolition of older structures that might in another setting be regarded as "contributing," or reviewing new construction, raises a policy issue that must be decided in each local situation. However, the basic concept of a conservation area strongly implies a presumption against such regulation. The reason, as noted earlier, is that the times call for a new approach -- one that maintains a balanced carrot and stick philosophy, so to speak. Unless the conservation area approach is perceived as one that is less burdensome or threatening to the average property owner, as well as one that is more positive and forward-looking, it will be perceived as more regulation in disguise.

### Legal and Administrative Aspects of Conservation Areas

Since local historic district regulation is an exercise of the sovereign authority of the state, whether carried out through zoning or stand-alone enabling legislation, it may be done only in accordance with state legislation and within state and federal constitutional limits. On the other hand, conservation area designation, as described in this article, does not involve the exercise of any additional regulatory authority, and so the planning enabling legislation of every state, coupled with the council's discretionary authority to manage the affairs of the city or town, is probably already adequate in and of itself. Depending on the form of government, the same would be true of the executive authority of the mayor or city manager to carry out the council's mandate.

In other words, new legislative authority for a city or county to undertake concentrated conservation area planning programs is probably not necessary, even though specific state enabling legislation would probably be useful for its educational or incentive value, or as a foil to the innate conservatism of most city attorneys.

What is required, however, is the political will to shower special attention on special areas of the city. Also required is the creativity and imagination to see the usefulness of the conservation area approach and to utilize it effectively. While it is a requirement in virtually all states that property taxes be collected on a uniform basis, there is no corresponding requirement that the public funds be spent equally on every

neighborhood. Given the special qualifications that lead to designation of conservation areas in the first place, justification for the extra expenditure involved should not be politically difficult.

Clearly, such studies, plans, designs, public consultation and other tasks related to conservation areas will impose additional responsibilities on city employees, and this can be a significant stumbling block to initiating the process unless additional fiscal and personnel resources can be found. Because of the absolute necessity in conservation area planning for extensive public and resident participation and consultation, the use of out-of-town consultants will usually be inappropriate.

As noted earlier, the limits to conservation area efforts are essentially the limits of local imagination and political and financial feasibility. For example, public conservation area planning efforts might in many cases be supplemented by such private sector initiatives as revolving loan funds. Or they might be supplemented by special education programs in local schools or the establishment of local city offices in affected neighborhoods. It remains crucial, however, that efforts targeted to improving the physical environment be balanced by programs that equally benefit the human aspects of the problem. It is clear that sound conservation area planning will require a more broadly based collection of special skills than those traditionally associated with historic preservation planning. The role of the local historic preservation community, lay and professional, will be even greater.

# What About Existing "Conservation Districts" ?

That something less restrictive than the traditional historic district is needed to round out the kit of local preservation tools is evidenced by the fact that several dozen cities around the country established conservation districts during the 1980s. Variously named ("conservation district," "historic conservation district," "historic conservation district," "historic conservation district," to be variations on the traditional historic district, notwithstanding the nominal difference.

Some are administered by a preservation commission; others by a planning or zoning commission. The nature of the activity regulated varies, the majority restricting demolition, and almost all controlling new construction to some degree, some less strictly than others. Who may nominate such districts also varies: in some cases designation is by property owners or a majority of them, and in others it is by a preservation commission or the governing board itself. Where there are specific design standards, application varies. In some there is control of architectural style, and in others only land use is regulated. The designated reviewing authority also varies: in some districts it is a preservation commission or architectural review board, and at others it is a planning or building official. Occasionally, design review is only advisory.

The existence of these districts raises the question, "What's in a name?" While called "conservation" districts, they rely heavily for their effectiveness on a regulatory approach and are in reality lenient versions of the traditional historic district. While this does not lessen or reduce their usefulness, the proliferation of names and the casual reference to "conservation" values engenders confusion and makes it more difficult for the conservation area planning effort described above to achieve their full potential.

# Conclusion

While historic zoning districts and their milder cousins continue as useful implements in the preservation tool kit, such regulations are essentially sticks. Conservation areas represent more of a carrot approach, in that they emphasize the possibility of significant public contributions to the maintenance of environmental quality. Of special importance is the non-threatening character of conservation areas, with their promise of "no new regulations" and, by implication, additional public investment in operations and maintenance and, through capital improvements, in neighborhood infrastructure. While there is always a tendency to concentrate on design issues and on the improvement of the physical environment, conservation areas, as the planning descendants of earlier approaches to urban renewal and community development, also offer an increasingly relevant and constructive means of dealing with human issues as well. In the long run, conservation area planning and designation, if and when it catches on in the somewhat idealized form presented here, may provide benefits that equal those of the traditional historic district with which we have been preoccupied for so many years.

# A CONSIDERATION OF CONSERVATION DISTRICTS AND PRESERVATION PLANNING: Notes from St Paul, Minnesota

by Carole Zellie Principal, Landscape Research St. Paul, Minnesota

# Introduction

At first examination, conservation areas or districts appear to offer appealing features to planners seeking an alternative to traditional historic districts with components such as binding design review for exterior alterations. As drafted in some cities, conservation districts offer a means to recognize the special historic and or/neighborhood character, and provide planning assistance and improvement without passing through the often arduous process of historic designation and design review. In 1991, the St. Paul Heritage Preservation Commission studied the conservation district concept to determine if other types of designation might be used to supplement the city's existing local historic districts. The study concluded that although a conservation district model might have some future utility, there were good reasons to continue with the city's program of historic district designation and design review. Combined with broad designation criteria, an aggressive public education program, and coordination with St. Paul's existing neighborhood planning effort, the sometimes controversial design review component can be supported as a critical tool for the maintenance and improvement of historic character.

The study was sponsored by the St. Paul Heritage Preservation Commission and the State Historic Preservation Office and conducted by Carole Zellie of Landscape Research. Prior to 1991, all of St. Paul's local historic districts, including high-styled residential areas such as Summit Hill and Irvine Park, were also listed on the National Register. Their architectural and historical significance was without dispute. However, a "new crop" of potential districts, characterized by older, largely vernacular buildings and a great need for housing improvement, provided some challenge to the past designation process. Although these areas meet the Heritage Preservation Commission's designation criteria -- which recognize the significance of urban and social history as well as architectural history -- as districts most of these new areas were not eligible for the National Register because of a low level of integrity. Planners and Commission members were interested in examining if a conservation district could provide special recognition and treatment for the architectural and landscape character of these areas without the burdens of traditional designation criteria and design review.

During the course of the study, an excellent test case was evolving in Dayton's Bluff, an historic neighborhood just east of downtown St. Paul. Dayton's Bluff is one of the earliest neighborhoods in the city with some fine examples of late nineteenth-century residential architecture. However, much of the current building stock includes unsympathetically altered houses as well as many simple vernacular houses of a type which is ubiquitous across the city. Many residents are of low to moderate income, and there are a good number of absentee landlords. Residents in the area have worked aggressively on strategies to improve the area and have employed several city-sponsored planning and rehabilitation programs. In 1991, Dayton's Bluff was under consideration for designation as a local historic district but did not meet National Register eligibility. Residents lobbied for designation as a local historic district, not as a conservation district, which they regarded as inferior in status and benefits. Design review was understood by many residents as an important new tool to halt further deterioration of the streetscape.

Although the public's distaste for the interference of design controls is widely discussed, this is not always the case, even in areas where private rehabilitation funds are limited. In Dayton's Bluff, residents viewed the design review controls as a positive benefit, and had a vision of the "Dayton's Bluff Historic District" rather than the "Dayton's Bluff Conservation District" from the beginning.

# The Conservation District Overview

The St. Paul study examined twenty ordinances in eighteen states and Vancouver, British Columbia. Interviews with a selection of planners were intended to learn how well the districts worked from a practical as well as the theoretical perspective. The relationship between co-existing historic districts and conservation districts was of particular interest. Concurrently, existing neighborhood planning programs and the operation of the Heritage Preservation Commission in St. Paul were examined in detail.

These twenty ordinances represented nearly twenty separate variations of a theme related to the conservation of neighborhood character. At one extreme, conservation has been interpreted with rigorous standards for exterior alterations with guidelines based on the Secretary of the Interior's Standards. At the other extreme, only a review of new construction was provided. In general, the ordinances showed how communities differentiate issues of historic character from those of general neighborhood character. Most conservation districts have <u>not</u> been created primarily to meet historic preservation goals; "conservation district" is most often an umbrella term for "neighborhood planning district."

# Definitions

In their introductory language nearly all conservation district ordinances addressed the need to promote the health, safety, economic, cultural, and general welfare of the public by encouraging the conservation and enhancement of the urban environment. The single term conservation (as opposed to conservation district) is seldom defined. Terms such as "built environment," "neighborhood character" and other elements vary in their usage. Language selected from three ordinances illustrates several approaches and conservation district definitions:

Boston, Massachusetts Architectural Conservation District:

'Architectural Conservation District', any area designated by the commission in accordance with section four (designation by commission) as an area containing any physical features or improvements or both which are of historical, social, cultural, architectural or aesthetic significance to the city and cause such area to constitute a distinctive section of the city.

Memphis, Tennessee Historic Conservation District:

"A local historic district established by the city council requiring architectural design review guidelines for demolition, new construction, or additions to habitable areas of buildings, structures, sites and objects in the public right of way and within the boundaries of the historic conservation district."

Omaha, Nebraska Neighborhood Conservation Overlay District:

"The NC Neighborhood Conservation Overlay District is intended to accommodate unique land use, urban design, and other distinctive characteristics of older established neighborhoods. The NC District, used in combination with a base district, allows variations in permitted uses and site development regulations that are adapted to the needs of a specific neighborhood."

# **Purposes and Characteristics**

The need for a conservation district with a historic preservation focus was apparent in Dallas in 1976, when the City was awarded a HUD 701 Demonstration Study Grant entitled "Conservation Strategies." Today there are eight conservation districts and eleven historic districts in Dallas; six of the historic districts and all of the conservation districts are residential. The conservation district ordinance authorizes the city to regulate and restrict the construction, alteration, reconstruction, or razing of buildings and other structures in "designated places and areas of historic, cultural, or architectural importance and significance." The ordinance notes that "whereas the city has historic district and areas, the conservation district is established to provide a means of conserving an area's distinctive atmosphere or character by protecting or enhancing its significant architectural or cultural attributes. A separate ordinance is created for each conservation district with a plan which includes design guidelines. While the historic districts in Dallas generally use the Secretary of the Interior's Standards for Rehabilitation, the conservation districts write their own. Many of the conservation districts appear to be eligible as historic districts but have used the conservation district as an alternative.

In other cities, preservation-oriented conservation districts have been created to perform primarily as historic districts. This occurred most often where there exists inadequate state or local legislation or local political support to create or administer historic districts. Conservation districts have often been created primarily to organize neighborhood planning efforts and coordinate housing rehabilitation programs as well as focus land use and zoning controls at the neighborhood scale. In some cities, such as Raleigh and Phoenix, the creation of the ordinance established a structure for creating neighborhood plans.

From the ordinances, it was difficult to determine which conservation areas were not eligible for local historic district designation because of low integrity or other issues. The designation process for conservation districts operates with diverse designation criteria. Conservation districts which evolved from a neighborhood planning base tended to have very broad eligibility criteria. Most of those districts developed as a means to assist historic preservation planning have designation criteria quite similar to those used for traditional historic districts, usually that based on the National Register of Historic Places criteria.

All of the conservation district ordinances reviewed were regulatory and over three-quarters were overlay zoning districts. The choice of form appears to relate primarily to local precedent and the provisions of state enabling legislation. The approval of a majority of residents is required for the creation of conservation districts in most cities and, in most cases, the application appears to have been initiated by neighborhood groups. Where required, application fees paid by neighborhood organizations partially covered the costs of a study, and fee waiver procedures are also provided. The level of citizen participation in the designation process and design review varied greatly.

Some conservation districts appear to serve areas that aren't physically "quite ready" or "quite there" for traditional historic district designation (to quote planners), or where it is thought that the needs of low and moderate-income homeowners are not well served by the creation of a traditional historic district. Conservation districts can offer recognition and some level of design review to these areas. However, several planners interviewed were careful to note that without design review for exterior alterations, they felt an important revitalization tool was lacking. Some planners endorsed the conservation district as a good interim measure for areas currently not eligible for historic district designation, with later redesignation as historic districts. However, no examples of this kind of transformation were identified.

# **Relationship to Local Historic Districts**

The relationship of local historic districts and conservation districts within each city varied greatly. In Nashville, the Neighborhood Conservation District, the Historic Preservation District and Historic Preservation Landmarks are created by the same ordinance and serve the same general goals. Known locally as Historic Zoning and Conservation Zoning, they are promoted as a coordinated pair of strategies designed to conserve areas of historic and architectural significance. Both types of zoning require review of demolition proposals and the design of new construction by the city architectural review board, the Metropolitan Historic Zoning Commission (MHZC). Nashville's Historic Zoning Districts, however, provide an additional level of review and protection, in the review of exterior changes such as alteration to porches, doors, windows and roofs. Similarly, the Cambridge, Massachusetts Historical Commission coordinates both the city's historic and conservation districts. In a number of cities, however, there is little relationship between the staff or programs which administer the two types of districts.

Some type of design review is a component of all conservation districts. However, <u>what</u> is reviewed varies greatly and this is the critical distinction between historic and conservation districts. Most ordinances provide for the tailoring of guidelines for design review to a specific area, but binding review of exterior architectural alterations is usually <u>not</u> a component of conservation districts. More typical in conservation districts is review of "built environmental characteristics," to quote Raleigh's ordinance, usually focusing on new construction considerations such as building height, scale, placement and setback, and materials. Review of demolition permits and the treatment of vacant lots are also standard components. Written guidelines and criteria for design review were included in all ordinances, but few examples included illustrations in the ordinance or in another document such as a handbook.

Public information directed at conservation area residents varied. Some programs, such as those in Cambridge and Nashville, appear to have carefully planned this component of the effort while other programs provided few if any special publications. Vancouver, British Columbia, is among the few cities where the ordinance and design guidelines were illustrated with many drawings and photographs.

Most planners gave mixed reviews of the success of the preservation-oriented conservation districts that they administer. Probably the most frequent critique of note for St. Paul was that some public as well as planner confusion seemed to prevail in cities with both heritage conservation and heritage preservation districts. Nearly all planners endorsed the positive public education role that conservation district designation played, but most wished for stronger design controls.

#### Nashville as a Model for St. Paul

The conservation districts in this study did not sort into tidy models. This is due in part to the architectural and historical diversity of the cities for which they were written, the diverse planning objectives at which they are directed, and the political frameworks in which they are administered. However, a primary division between the ordinances can be characterized as the "neighborhood planning model" and the "architectural or historic preservation model." In its final phase, the St. Paul study examined ordinances and conservation district programs in Phoenix, Dallas, Nashville, and Cambridge, in additional detail and concluded that the second model, with a focus on historic resources in addition to new construction, land use, and other neighborhood planning issues promised to be most useful for St. Paul.

Nashville was of particular interest. As noted above, Historic and Conservation Districts were created here under one ordinance which gives the two classifications equal status and similar operation. The districts and landmarks were provided "to ensure preservation of structures of historic value to Metropolitan Nashville and Davidson County." Among the specific purposes of the districts are the preservation and protection of the historical and/or architectural value of buildings, other structures, and historically significant areas, the creation of an aesthetic appearance which compliments the historic buildings or other structures, the stabilization and improvement of property values, to foster civic beauty and

strengthen the local economy. There are currently two conservation and two historic districts. The largest conservation district includes 1,200 buildings. The general designation provisions of the ordinance incorporate National Register criteria for both types of districts.

Nashville's planner, Shain Dennison, reported that the Conservation Districts "provide a choice." The difference between the Historic Preservation and Neighborhood Conservation Districts is that in the former, no structure shall be "constructed, altered, repaired, relocated or demolished" unless the action complies with the requirements of the ordinance. In the latter, only construction, relocation, demolition and increase in habitable area are reviewed.

By the criteria, both conservation and historic districts would appear to be eligible for the National Register although planning staff applied the criteria quite flexibly in the conservation districts. It appears that Nashville's historic districts contain the more high-styled buildings. Here, as in other cities attempting to supplement historic districts with conservation districts, the conservation districts were best suited to areas where there was already good maintenance, a pattern of relatively little exterior change, or where residents were strongly opposed to design review. The conservation district, although offering some control, did not offer much to low-maintenance areas where review of exterior alterations was regarded as critical.

The Nashville model provides a well explained process and rationale for its two-tier system. The recognition provided by the conservation district the Nashville planner noted, was regarded as a positive benefit and served to reassure new buyers that some type of control was in place. Well-designed public education materials included a handbook and several brochures.

# Conclusions for St. Paul

St. Paul's neighborhoods already benefit from 17 District Councils, each staffed with a community organizer and a District Planner, and there already exist specific long-range plans for each area. Each District has prepared a plan which inventories its physical, social, and economic components and makes recommendations for treatment. However, the District Council plans do not follow a standard format with regard to components of historic and/or neighborhood character. A Heritage Conservation District might encourage recognition and protection of historic neighborhood character in areas where the Commission or area residents do not feel existing Heritage Preservation District controls are appropriate. In particular, a Heritage Conservation District with limited design review, perhaps only of new construction and demolition, might be created in stable "newer" areas of twentieth-century residences where existing historical research does not fully support designation as a Heritage Preservation District. Here, historic architecture might contribute to neighborhood character, but if houses are not poorly maintained or subject to unsympathetic alteration, design review might not be critical but recognition of the area's special qualities would assist in focusing public interest and planning assistance. A Heritage Conservation District might also be created as a buffer around new or existing Heritage Preservation Districts. Review of demolition permits and new construction would be of great use in older areas undergoing selective building clearance and redevelopment.

The study recommended that a Heritage Conservation District for future study should be based on models where:

The District was administered by the existing Heritage Preservation Commission and planning staff and was well coordinated with historic district planning;

The District was perceived by residents as having equal status and recognition with other local historic districts;

The objectives of the Heritage Conservation District were clear and the review process efficient;

Public information and education were used to further the goals of the district and planning program.

It was also recommended that criteria for eligibility should be the existing Heritage Preservation Commission Guidelines. In their current form, these guidelines provide for broad interpretation of historical significance and would accommodate many types of areas. Activity regulated within the St. Paul Heritage Conservation District would include demolition, exterior design of new buildings, additions which increase habitable areas and relocation. Activities not regulated within the Heritage Conservation District would include exterior design of alterations to existing buildings, alterations to existing property (including fences, sidewalks, lighting and signs).

The designation process should include an inventory of buildings and features, initiated by the Heritage Preservation Commission or the District Council; the development of preliminary boundaries and guidelines; and provisions for presentation for approval by residents through a public hearing and informal meetings.

Design guidelines which address the exterior design of new buildings and the design of additions should be developed for each heritage conservation district. Additionally, this information should be made available to property owners in the form of a brochure or handbook.

Finally, the permit review procedure should follow that specified in the current Heritage Preservation Ordinance. (It should be noted that unless the Heritage Conservation District met National Register eligibility criteria, tax certification could not be extended to the area.)

# Study Follow-up

Heritage Preservation Commission members, St. Paul Planning and Economic Development staff, and State Historic Preservation Office staff were among reviewers of drafts of this study. Although the useful applications of the model proposed for St. Paul were recognized, several reviewers commented on the possibility for confusion between Heritage Conservation and Heritage Preservation Districts. Although it has been emphasized that the districts would be presented as of equal status, as has been done in Nashville, a number of reviewers reiterated that the existing guidelines were already flexible enough to designate a broad range of areas as historic districts. This does not, however, provide for special intervention in the buffer zones which usually lie at the edges of districts.

The Heritage Preservation Commission follows the Secretary of the Interior's Standards for Preservation Planning in its evaluation and designation processes. However, the Commission takes a broad view of the existing integrity of properties in evaluating their significance. Integrity is not specifically mentioned in the designation criteria. This contributes to the opinion that the existing Heritage Preservation District ordinance is sufficiently broad to protect many types of areas. The study recommended new opportunities be created to work with the District Councils on strengthening the relationship between historic preservation and neighborhood planning. A good deal of effort has been put into creating legislation and administering historic districts for specific areas. However, while many people recognize the value of a designated historic building, appropriate conservation of older housing stock everywhere in the city is desirable. Much could be accomplished if public education programs encouraged homeowners to use care in planning exterior alterations, and if city-funded rehabilitation programs took a leading role in setting a high standard for affordable maintenence and rehabilitation work, particularly for siding and window replacement and porch repairs. The entire city, with the great bulk of its traditional housing built before 1930, might be regarded--if not designated--as a conservation area. Here, public education and housing improvement programs rather than design regulations could be leading tools in the effort to maintain building condition and integrity.

(In August, 1992 the St. Paul City Council approved the Dayton's Bluff Historic District which contains over 500 properties. A design guidelines handbook has been prepared for distribution to all property owners in the area.)

# **General Conclusions**

Evidence from around the country indicates that architectural and historic preservation-oriented conservation districts with limited design review can be a useful supplement to the traditional historic district. They function best in this role when they are applied to areas with a history of good maintenance and little exterior change and/or where residents are strongly opposed to full-fledged design review. In areas where there is a pattern of low maintenance and unsympathetic exterior alterations, conservation districts with limited design review are less effective at preserving neighborhood character.

# Sources of Information on Conservation Districts

Conservation District Project Research Report for the National Trust for Historic Preservation, Deborah M. Kelley and Jennifer Goodman. Prepared by the Preservation Coalition of Greater Philadelphia. June 1991. Available from the National Trust for Historic Preservation, 1785 Massachusetts Avenue, NW, Washington, DC 20036. Phone: (202) 673-4000.

Innovative Tools for Historic Preservation, Planning Advisory Service Report Number 438, Marya Morris. American Planning Association. September 1992. Available from the Planner's Bookstore, 1313 E. 60th Street, Chicago, IL 60637-2891. Phone: (312) 955-9100.