Updating and Improving the National Historic Landmarks Program

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"… the production of historical narratives involves the uneven contribution of competing groups and individuals who have unequal access to the means for such production."

- Ralph-Michel Trouillot, Silencing the Past

Introduction

The National Historic Landmarks Program exists to identify, designate, and protect properties that illustrate and commemorate all of American history. The Program has changed and improved since its establishment, and it has struggled to respond to new technologies, new fields of academic expertise, and local and national exigencies. NHL staff, preservation professionals, and everyday residents of the United States have contributed to the Program's success over the past fifty years. This history has been described in published books and articles, in reports to the Director of the National Park Service, and elsewhere.

The meaning and urgency of the NHL Program has changed across decades, but it is clear that the Program must now take energetic steps to connect with a broad cross-section of the American public, with a population that is more urban, and with Americans who are younger and more multilingual than before. The National Park Service must also do more to represent

important histories that have been overlooked, marginalized, or slighted in the past. In pursuing these goals, our interpretations of American history must keep pace with the latest and best research and scholarship.

In the view of many preservationists, the Program's key principles and formal regulations have been obscured and complicated in recent decades by published guidelines, by administrative inertia or underfunding, and by other challenges. These concerns have been expressed in academic conferences, in meetings of the Second Century Commission of the National Park Service, at gatherings of the National Trust for Historic Preservation, and elsewhere.

Driven by a desire to see all American histories preserved for future generations, members of the NHL Committee have devoted considerable time and energy in recent years to considering how to help improve the Program. We have been guided in these efforts by the hard work of others. Members of our Committee have reviewed past preservation efforts, discussed theme studies published since 2000, consulted with staff members, and studied NHL processes and priorities. We have met with members of the American public who are not formally affiliated with the NHL Program, and we have attended conferences and other gatherings to hear multiple perspectives on the Program.

We have done this work in partnership with NHL staff both in Washington, DC, and the regional offices, and with State Historic Preservation Officers, Tribal Historic Preservation Officers, the National Trust, and various individuals and organizations devoted to historic preservation. We heard, too, from preservationists and communities that have not felt welcomed by the NHL Program in the past, and from critics of the Program who expressed frustration with

its regulations and apparent priorities. Thanks to support from the Kellogg Foundation, committee members had the opportunity to hear perspectives from around the country in a series of meetings in 2015 and 2016. Multiple voices at those gatherings expressed the urgency of updating the Program to meet the needs of the 21st century, to be consistent with best practices in the field of historic preservation, and to remain responsive to new discoveries in history, archaeology, and other fields.

Recommendations:

Members of the National Historic Landmarks Committee remain convinced that a vibrant NHL Program will be critical for preserving the histories of all Americans in the 21st century. We believe that our NHLs must do more to energize and excite the American populace, and that steps must be taken immediately to assure that the Program better engages local communities in our shared efforts to preserve and learn about the nation's collective past. We offer four key recommendations for updating and improving the Program.

1: Affirm the Importance of Transparency, Accessibility, and Representation

The National Historic Landmarks Program must be accessible and representative. It must also be seen as collaborative and committed to civic engagement and dialogue. Too many Americans have viewed the NHL process in the past as difficult to access and understand, and as too hierarchical in its approach. The Program must continue working to be receptive to emerging scholarship and the interests of a very broad public, and it needs to do more to share authority

with many audiences and experts.

Our committee applauds recent efforts by the NHL staff to make the NHL Program more transparent, accessible, and representative. The Program must engage more effectively and energetically with new audiences, and it should continue to grapple with how best to encourage NHL nominations that preserve under recognized histories. The process as it currently stands often has unintended, exclusionary effects.

We urge staff to confront that problem head-on in the coming years. Perhaps most importantly, working to create a more transparent, accessible, and representative NHL program will require rethinking the nomination process. It will also require energetic education and outreach efforts to Americans who know little about the Program, or have not in the past seen themselves represented in the Program.

This work demands a consideration of how criteria are interpreted and guidelines written, and how the work of a very busy staff is prioritized. The Committee urges the Program to set its future priorities, to revise its guidelines, and to consider new, creative initiatives with transparency, accessibility, and representation foremost in mind.

2: Eliminate Barriers to Public Participation

Many Americans have viewed the NHL nomination process in the past as discouraging and expensive. The standard for achieving National Historic Landmark status should be high, but the nomination process itself should be less difficult to initiate and complete. In recent years nominations have cost tens of thousands of dollars to produce, taken several years to resolve, and produced documentation of several hundred pages.

The NHL staff has taken steps to reset expectations, to guide nominators through the process, to establish a clear timetable and scope of work, and to improve communication. Much more must be done in the 21st century, and State Historic Preservation Officers and others outside of NPS should be encouraged to provide suggestions on how best to remove barriers to participation and eliminate unnecessary delays.

The NHL Program must look for ways to reduce the various costs associated with its nomination process. A standard, preliminary questionnaire might be developed to allow staff and NHL Committee members to provide early responses on potential nominations. Nominations that are approved to move forward should receive consistent staff feedback and be completed within a reasonable time frame. Paperwork should be streamlined and the length of nominations reduced. The National Park Service should explore what new infrastructure might be required to support a more accessible and more robust NHL nomination process. And nominations of properties that might deserve National Historic Landmark designation should be actively encouraged — with energetic outreach by NPS that explains the aims of the program and any future changes made to the Bulletin.

3: Develop a New Strategic Plan and Standardize Best Practices

The NHL regional offices should actively solicit and contribute to nominations of future sites, but basic procedures should be standardized across regions. Staff should adopt similar approaches to letters of inquiry, accepting and reviewing nominations, working with local communities and organizations, and cooperating with State Historic Preservation Officers and other stakeholders. A spirit of encouragement and cooperation should be communicated to those

outside of the Program whenever possible. Steps have been taken in this direction, but greater standardization of these practices remains a high priority.

A new Strategic Plan for the NHL Program should guide those procedures, the prioritization of staff work, and how the Program's procedures and priorities are described to the public. Committee members, State Historic Preservation Officers, and other stakeholders should have input into the writing of that Plan.

NPS should move to develop a Strategic Plan for the NHL Program right away. That document should direct staff efforts towards major priorities for the NHL Program — including the preservation of threatened properties, work with underserved communities, and nominations of importance to one or more theme studies. And in the future it should be revisited, revised, and updated on a regular basis — perhaps every five years – with opportunities for public comment.

4: Revise the Bulletin and Guidelines that Describe the NHL Program

The National Historic Landmarks Bulletin (completed in 1999) must be revised immediately. It should be edited for clarity, its bibliography and appendices must be updated, and a more diverse slate of case studies should be included to assist preservationists facing 21st-century issues. Long out of date, the existing guidelines contribute to the great confusion and frustration surrounding the NHL Program. As written and recently interpreted these guidelines have made the NHL Program more rigid than it once was, and far less flexible than it should be.

A 21st-century Bulletin should communicate openness and engagement with a diverse American public. It should capture the complexity of issues such as national significance, periods of significance, and integrity, and it should emphasize that modern approaches to these

and similar topics must be careful and nuanced, requiring frequent and ongoing input from scholars and subject-matter experts outside of the NHL Program.

A revised Bulletin should describe the importance of "feeling" and "association" for NHL designation, and new guidelines should clarify when and how sites can be designated as NHLs even when physical integrity is compromised or key structures are non-existent. Guidelines should emphasize flexibility in approaches to integrity in considering threatened sites, sites that illustrate or commemorate under-recognized histories, and sites connected to recent theme studies. Flexibility must be communicated regarding property types, as well. Revised guidelines should note that many types of properties have already received NHL designation, and that new types of properties will likely receive NHL designation in the future.

Revised guidelines should also update explanations of how national significance is determined and recognized. For example, the Bulletin should note that sites frequently carry multiple meanings for different groups of Americans. It should urge staff to consider national significance from many different vantage points, and it should acknowledge that individual Landmarks often illustrate or commemorate different histories of national significance at once. Revised guidelines should be clear, as well, that significant events, individuals, organizations, and other features of the American past have been and should be represented in multiple, and not necessarily contiguous, NHL sites.

Finally, the revised Bulletin should be more clear regarding sites important to the recent past. It should note that the fifty-year guideline has not prevented, and should not in the future dissuade, preservationists from seeking NHL designation for sites critical to American history in the late-20th or early-21st centuries.

In these ways and others, a revised Bulletin should make the NHL Program more transparent, accessible, and representative; it should better represent the modern concerns of the Program; it should eliminate unnecessary barriers to broad participation in the nomination process; and it should guide staff and others to make flexible but informed decisions in the coming years.

Conclusions:

With its founding principles in mind, the National Historic Landmarks Program must change key procedures and guidelines so that NHL staff, State Historic Preservation Officers, and others can better work together to preserve and tell all American stories. This work is urgent. In the 21st century, preservation efforts must be energetic, forward looking, and democratic. They must engage and educate the broad public, embrace histories that have not been adequately protected and interpreted by the NHL Program in the past, and remain current with academic scholarship, best practices among preservationists, and the interests of local and national stakeholders. The NHL Committee should play a central role in pursuing the goals outlined in this document in the coming months, but NHL staff, preservation professionals outside of NPS, and others must also have a permanent voice in these and other future efforts to improve this important Program.