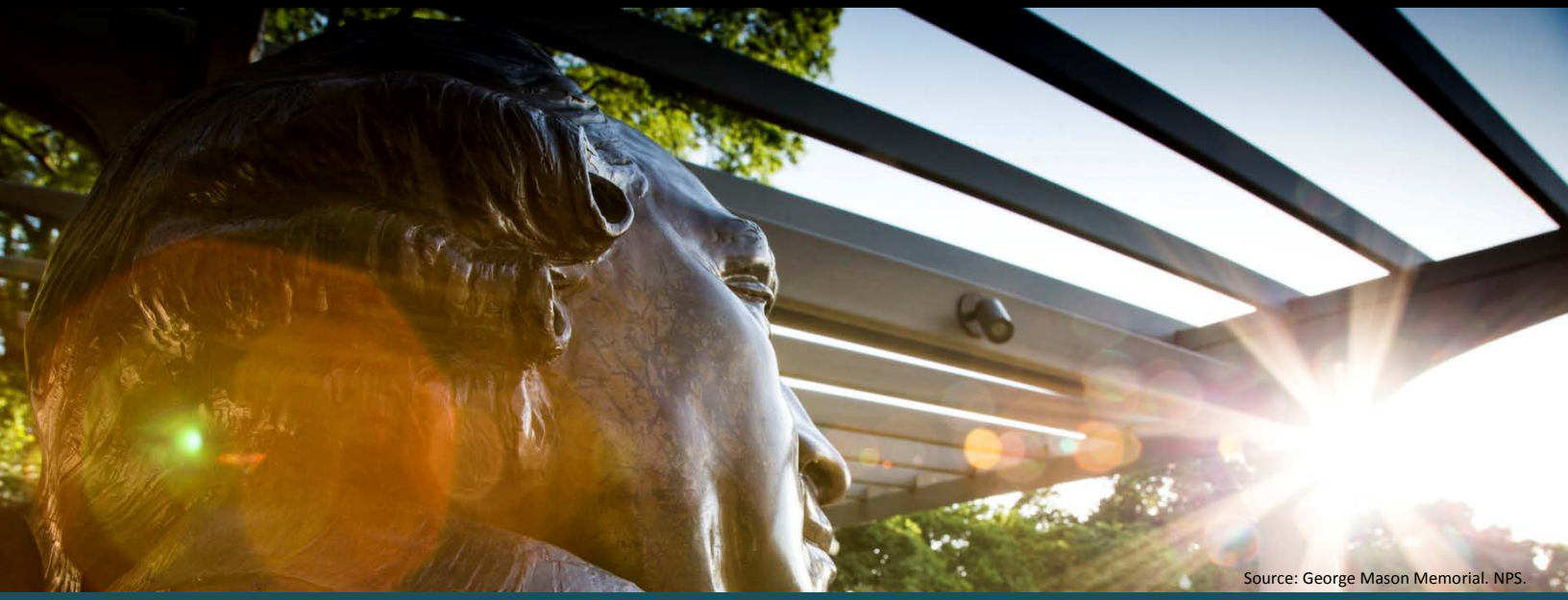
Historic Preservation Planning

National Park Service
U.S. Department of the Interior

Historic Preservation Planning Program
Washington, DC



Source: George Mason Memorial. NPS.

SHPO Perspectives: Program Analysis of Statewide Historic Preservation Planning

August 2014

Historic Preservation Planning Program
State, Tribal, and Local Plans & Grants Division
National Park Service
Washington DC

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Project Purpose and Overview

The National Park Service Historic Preservation Planning Program (HPPP) provides assistant to State Historic Preservation Offices (SHPOs) during the development of the Statewide Historic Preservation Plan (State Plan). The State Plan is a SHPO-produced document that provides a vision for statewide historic preservation and is meant to encourage broad public participation in planning for cultural resources, meet challenges unique to each state, influence historic preservation policy in state and local governments, and empower local communities, organizations, and individuals to action.

In 2012, Tanya Gossett, the HPPP's new program manager, began assessing the status of the program in general and its statewide planning component in particular. Recognizing that HPPP needed more information from states about their planning activities and about their perspectives on NPS requirements for State Plans, Gossett proposed hiring a National Council for Preservation Education (NCPE) intern to gather and analyze the information. NPS funded the internship in 2014 and Gossett selected Lindsey Morrison to undertake the project. Morrison began the project in June 2014 and completed it in August 2014. The project's purpose is to identify strengths, weaknesses, and opportunities in current HPPP programming for statewide planning, and to understand better the preservation planning challenges and achievements within the SHPO community.

Methodology

The 2014 program analysis of statewide historic preservation planning involved several data collection methods. The methods, listed below, served to attain a holistic understanding of the preservation challenges within the SHPO community and to directly develop practical recommendations for the National Park Service Historic Preservation Planning Program about ways to provide better guidance and technical assistance for states in the future. The recommendations from this program analysis are provided on page 13 and 14.

Method 1: Literature Review and Analysis of State Plans

- Reviewed key literature, including Historic Preservation Fund Grants Manual, National Historic Preservation Act, NPS HPPP Website, and a select sample of approved State Plans.
- Reviewed all current State Plans from 54 states, DC, and territories.

Method 2: Online Survey

- Created and distributed online survey to 57 states, DC, and territories.
- Collected and analyzed data from 65 respondents across 45 states.

Method 3: Interviews

- Interviewed and discussed key themes and trends with 12 SHPO professionals via 45 – 60 minute phone conversations.

Summary of Research Results

The following sections explain the methods and results of this 2014 program analysis of statewide historic preservation planning. While the most salient themes and trends are shown in the following pages, please refer to the companion guide, *SHPO Perspectives: A Reference Document of Research Materials and Project Results*, for a complete listing of the online survey results and data collection materials.

Literature Review and Analysis of State Plans

During the first two weeks of this project (June 2, 2014 through June 18, 2014), NCPE Intern Lindsey Morrison, reviewed key documents containing laws, regulations, and policies for developing State Plans. These documents included the Historic Preservation Fund Grants Manual, the National Historic Preservation Act of 1966, as amended, NPS website materials, and a select sample of approved State Plans. This literature review provided Morrison with a context, or a frame of reference, for understanding the rationale and significance of statewide historic preservation planning.

HPPP also wished to attain an in-depth understanding of current statewide preservation planning efforts within the states. For this, Morrison read and collected data from 54 current State Plans, focusing on NPS comments and email correspondence between NPS HPPP program managers and SHPO planning staff.

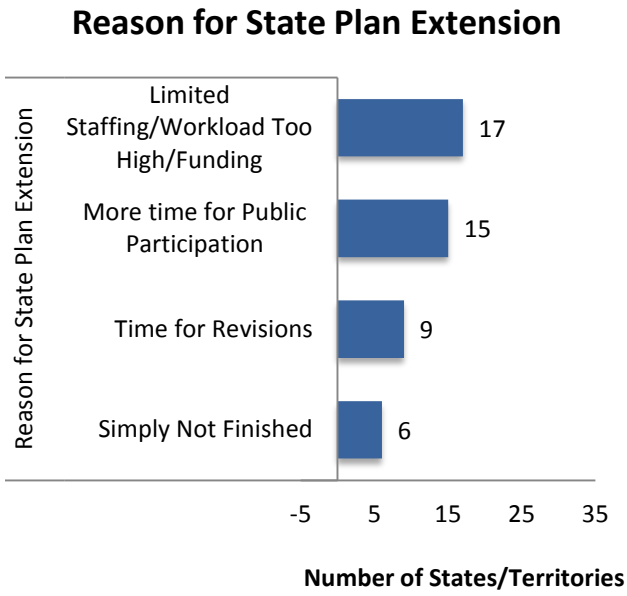


Figure 1. SHPO Reasons for State Plan Extensions

The review of the 54 current State Plan analysis indicated that **65%** of the states (35 State Plans) asked for an extension for their previous State Plan in order to continue working on the current draft. This concerns the HPPP because a large number of extensions illustrate a need for NPS to provide either more information or training for SHPOs to increase the successfulness of approving new State Plans before the expiration of a previous State Plan. From the analysis of current State Plans, the reasons for extensions (seen in Figure 1) include limited staffing/high workload/low funding, more time needed for public participation, more time needed for revisions, and simply not finished.

HPPP decided to conduct further analysis of previous plans, specifically focusing on NPS comments to determine if there were any common themes or trends that point to the underlying factors leading to State Plan extensions. Upon reviewing NPS comments to State Plans, most states (38, or 70%) were asked by the NPS to expand or adjust their section on public engagement. 28 of the State Plans (51%) were reported to have not adequately interpreted or explained raw data from cultural resource analyses or public engagement surveys. About half of the State Plans, furthermore, were deemed by the NPS HPPP program manager to be too SHPO-centric, or focused on SHPO actions and needs as opposed to statewide historic preservation needs. The results from reviewing NPS comments are seen below in Figure 2.

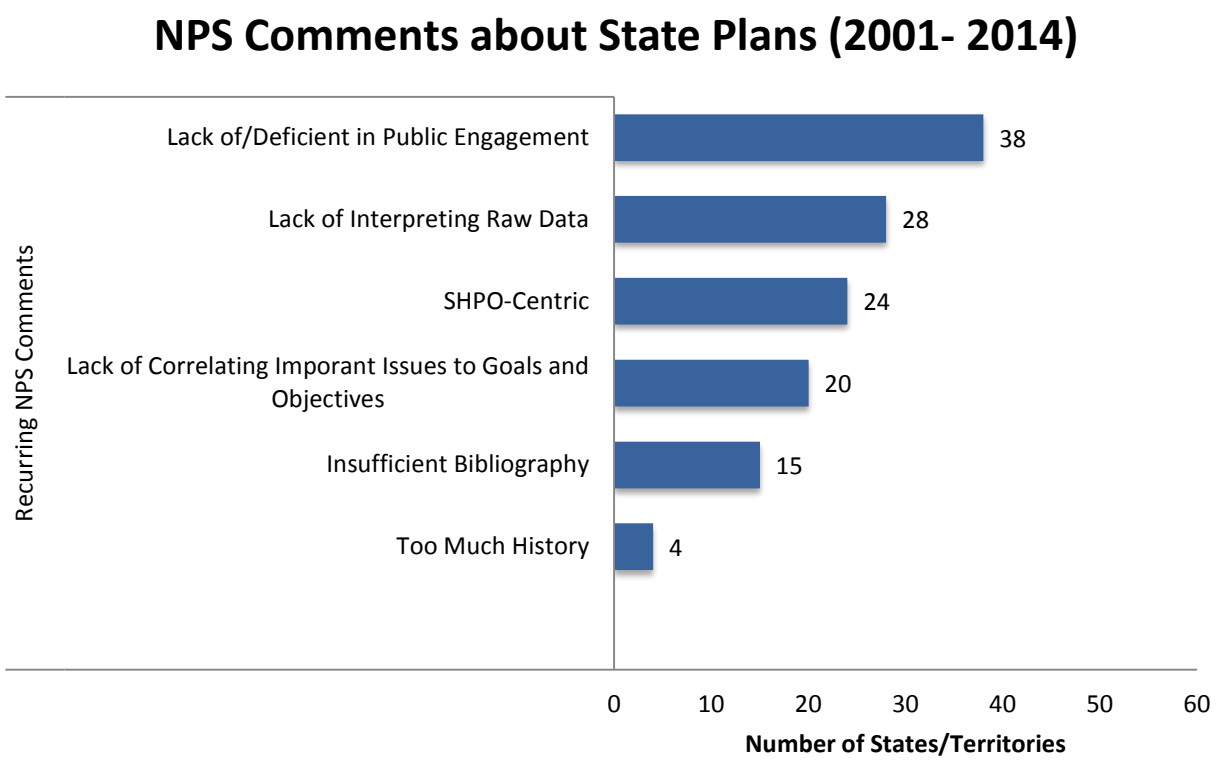


Figure 2. Recurring NPS Comments to State Plans, as gathered from within the plan as well as on the NPS Informal and Formal review forms

Planning Themes and Trends

The results from this initial literature review and analysis of 54 current State Plans illustrate a large number of SHPOs encountering challenges during the statewide preservation planning process. This review and analysis also indicated how low availability of staff and funding can diminish the SHPOs ability to develop and implement the State Plans, a critical issue that is mirrored throughout the remainder of this report. Finally, public engagement appears to be a particularly challenging aspect of the planning process, leading to extensions of previous State Plans, and often more than once.

Altogether, this review of key literature and current State Plans provided a window into the complex issues of statewide historic preservation planning. HPPP explored these issues further through bringing together the perspectives of SHPO staff in online surveys and interviews.

Online Survey Results

As a way to gather multiple SHPO perspectives from across the country in a short amount of time, the HPPP constructed and distributed an online survey comprised of 21 questions relating to the development and implementation of State Plans. Using the survey tool Google Docs, the data collection covered five main topics: including respondent information, planning for the plan, public and stakeholder engagement, training and assistance for plan development, and final thoughts on the State Plan.

The HPPP distributed the online survey to 164 SHPO staff in 57 states, DC, and territories with the goal of receiving feedback from at least 45 states. The online survey received **65 responses** representing **45 states, DC, and territories** (Figure 3), meeting the NPS target. Morrison "opened" and distributed the survey on June 20, 2014, sent weekly reminders to SHPO staff on June 26, July 1, and July 8 and July 16, and "closed" the survey on July 18, 2014.

The results of the online survey are broken down into the following themes.

1. Formal Training on Preservation Planning
2. Additional Guidance Documents and Learning Materials
3. Administrative Challenges during the Planning Process

States Responded to Online Survey

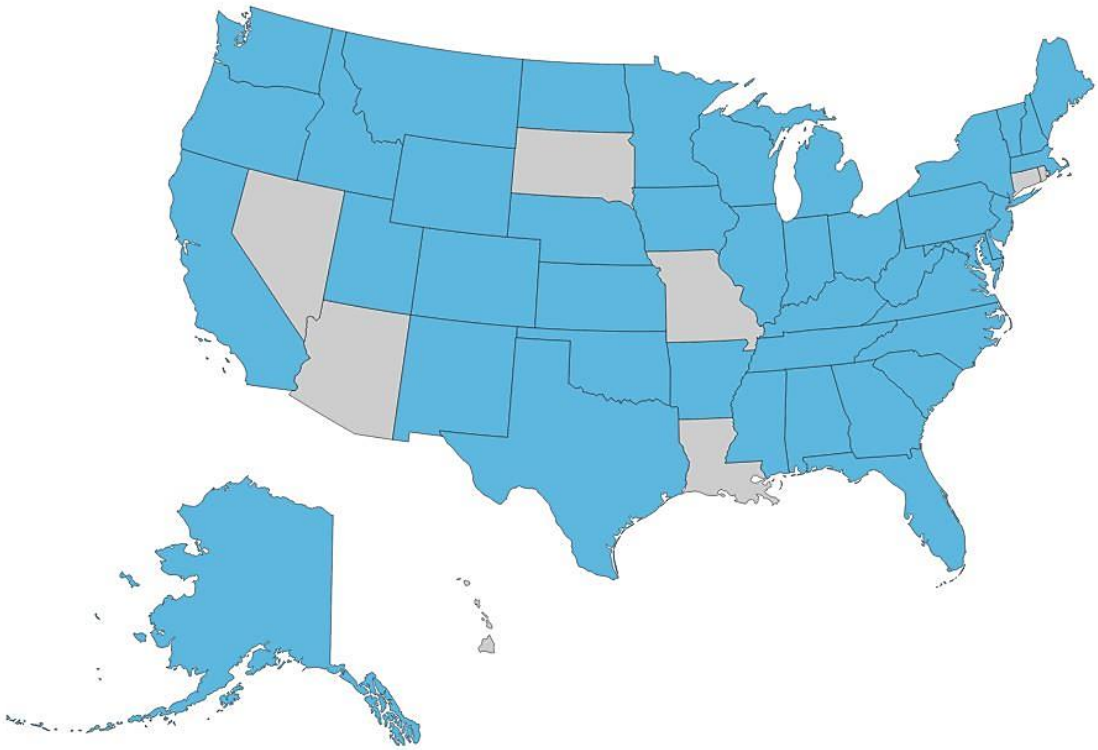


Figure 3. Map of United States showing the 45 states, distinguished in blue, which responded to the online survey. The District of Columbia, American Samoa, and the US Virgin Islands responded to the survey but are not shown on the map.

Formal Training on Preservation Planning

The results from the online survey indicated that SHPO staff charged with developing the State Plan mostly relied on their or other staff expertise, seen in Figure 4. During the development of the State Plan, SHPO staff reported that they also reference the Secretary of the Interior (SOI) guidelines, the *Historic Preservation Funds (HPF) Grants Manual*, and the NPS website. SHPO staff reported a moderate reliance on NPS staff, other State Plans, and outside research during the planning process.

While survey respondents indicated that SHPO planning staff rely most of their own or other SHPO staff expertise when developing the State Plan, only 29 out of 65 respondents, or **45%**, self-identified as a preservation or community planner. However, in another question on the survey, only **28%** of respondents identified their academic or professional discipline as a preservation planner. This difference likely corresponds to key SHPO staff who take on the role of preservation planner but do not have any formal training in planning.

Another component to this issue is the high turn-around rate at SHPOs. At the beginning of each planning cycle, it is common for new staff to take over as planner after experienced staff have moved on. While some SHPO have the fortune to use previous staff to act as consultants, their valuable knowledge in preservation planning is not always transferred to new staff due to high workloads, high turn-around rates, staff attrition, and low funding. Developing sustainable training on preservation planning from the National Park Service is therefore very important for the states.

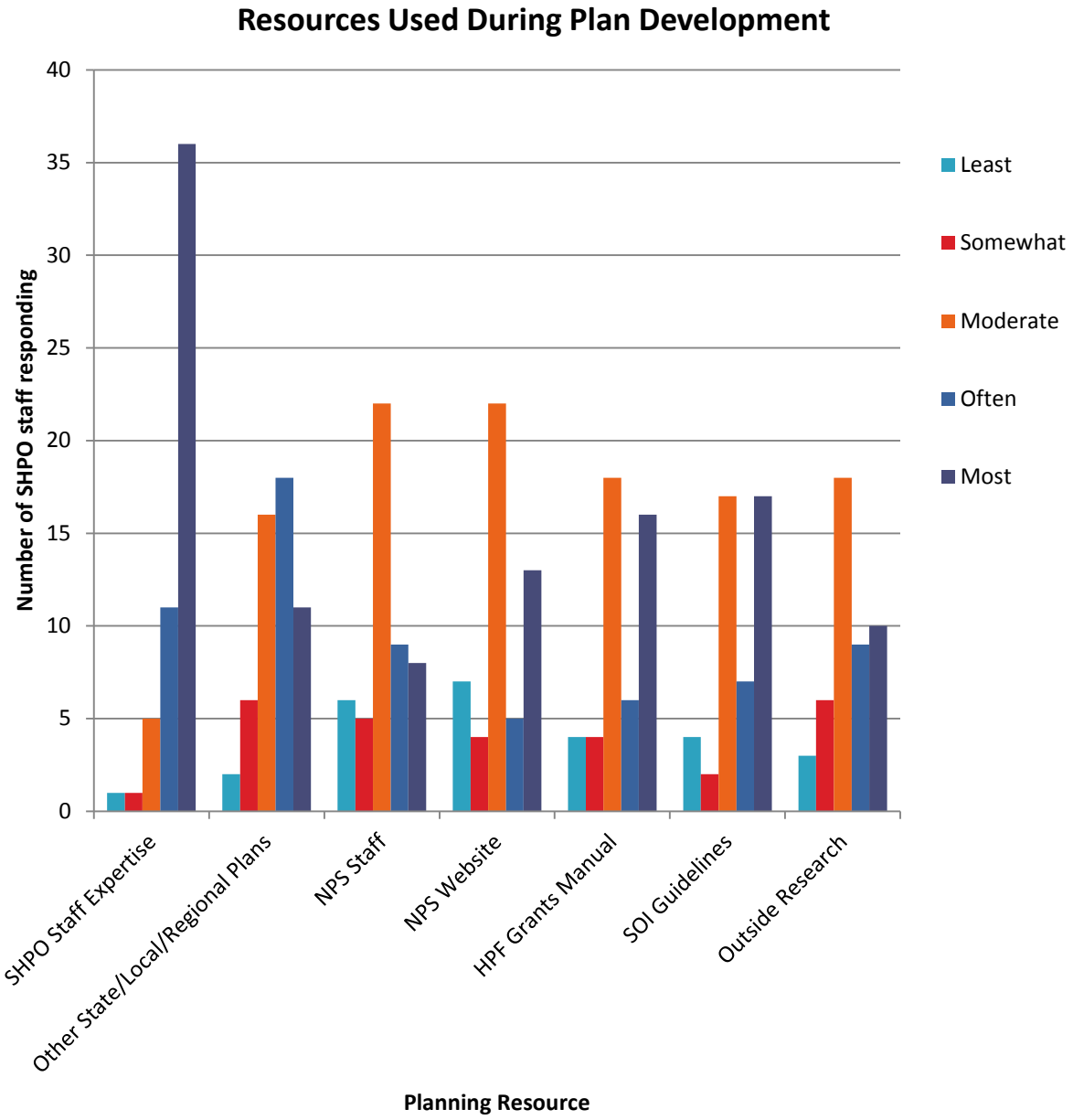


Figure 4. Resources used during the development of the State Plan. Survey results indicate a clear reliance on SHPO staff expertise.

Additional Guidance Documents and Learning Materials

As identified in the literature review and analysis of previous State Plans, the most challenging stage of the planning process for SHPOs is public and stakeholder engagement. The results from the online survey supported this finding, seen in Figure 5. While SHPO staff identified each stage of the planning process as at least *moderately difficult*, the most difficult tasks included public and stakeholder engagement, writing/revising the plan document, analysis of resources, and formulating goals and objectives.

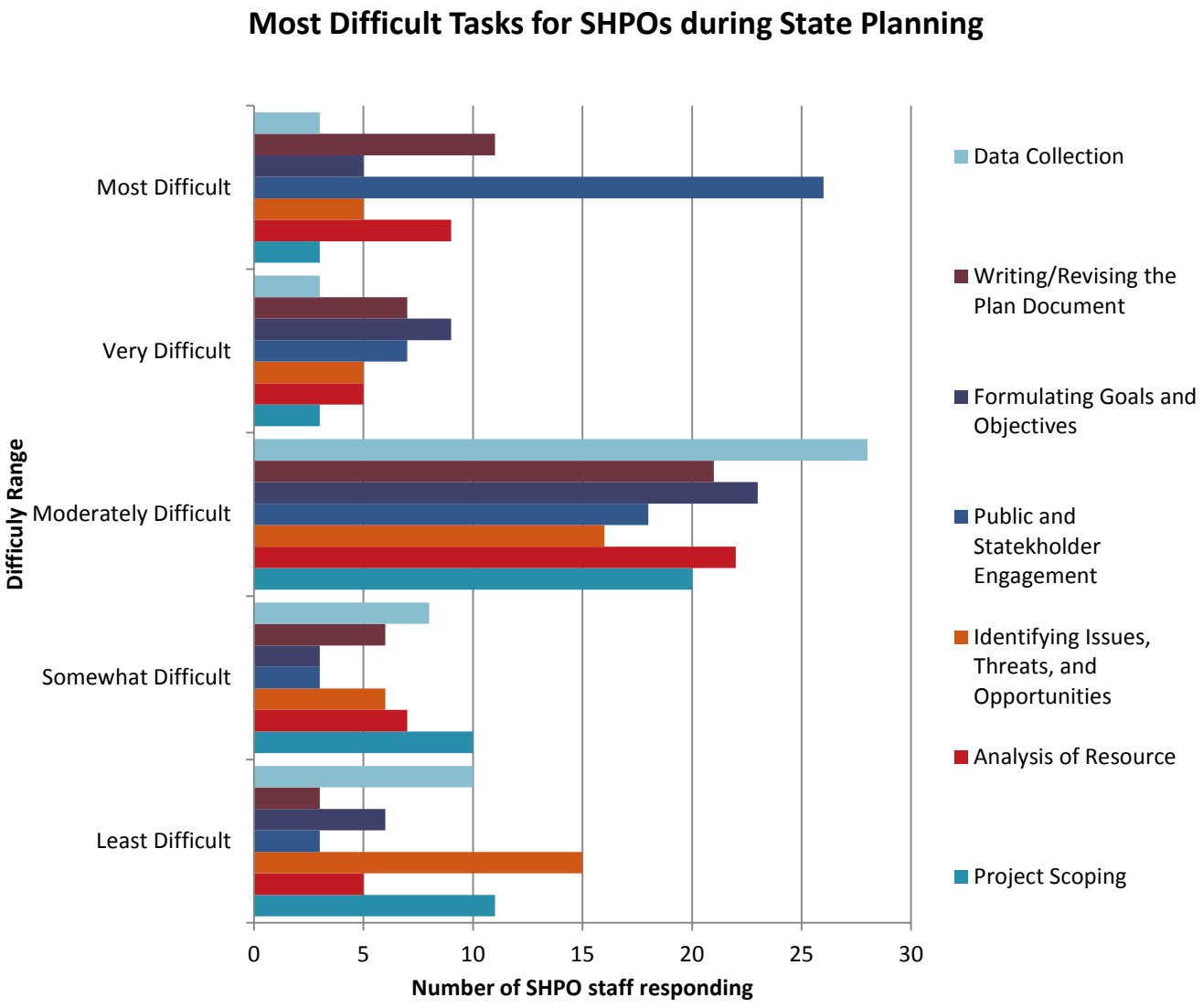


Figure 5. Statewide preservation planning tasks ranked by difficulty by SHPO staff directly involved in preservation planning.

Survey results indicated that engaging a variety of diverse groups, especially those outside of the normal preservation constituents, is a daunting task, especially for SHPO staff who are not permanent, trained, planners and who are juggling other duties.

In order to provide better guidance and technical assistance for states during the planning process, the HPPP also asked SHPO staff what types of training or learning resources states would be interested in receiving. **89%** of respondents expressed an interest in receiving training on developing and implementing the State Plan, clearly showing the immediate need to address this issue with the states. When asked what resources would be most useful for SHPO staff, the responses are as follows.

1. Examples of plan components that meet NPS requirements (**86%** of respondents)
2. Face-to-face workshops with NPS staff (**68%** of respondents)
3. Webinars (**62%** of respondents)
4. Planning process case studies (**60%** of respondents)
5. Written guidance (**60%** of respondents)
6. Face-to-face workshops with professional planners (**51%** of respondents)
7. N/A or Other (**5%** of respondents)

Administrative Challenges for SHPOs and Preservation Planning

Considering the results of the 54 State Plans analysis, HPPP thought to quantify the administrative challenges to the planning process which often leads to multiple extensions of State Plans. In the online survey, HPPP therefore asked SHPO staff, "what do you believe are the greatest administrative challenges your office faces or has faced in developing the State Plan?"

Seen in Figure 6, the results indicated that the greatest administrative challenges to the planning process are availability of staff (**67% of respondents**), capacity to engage the public and stakeholders (**67% of respondents**), and funding (**47% of respondents**).

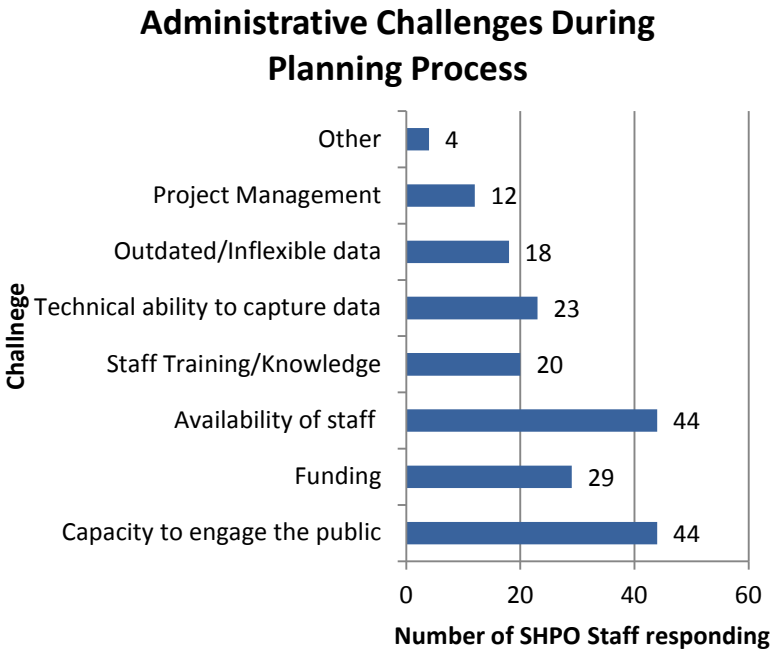


Figure 6. Administrative challenges for SHPOs during the planning process

Interview and Qualitative Response Results

The final stage of this 2014 program analysis of statewide historic preservation planning involved analyzing the short answer, or qualitative, responses from the online survey and contacting a select sample of states for in-depth interviews.

The HPPP constructed a list of select SHPO offices who either excelled at the planning process or were particularly challenged by an aspect of the planning process and overcame that challenge. Altogether, NCPE intern Morrison, interviewed professionals from 12 SHPO offices, seen in Table 1 and Figure 7. Morrison systematically identified the common themes and trends from the interviews and compared them to the results from the literature review and analysis of 54 State Plans as well as the online survey data.

Table 1. Professionals Interviewed from 12 SHPOs.

Interviewed State	Contact
California	*Jenan Saunders*, Deputy SHPO
Colorado	*Astrid Liverman*, Preservation Planner
District of Columbia	*David Maloney*, SHPO
Idaho	*Jamee Fiore*, Historic Preservation Review Officer
Indiana	*Steve Kennedy*, Assistant Director Administration
Maryland	Nell Ziehl, Chief of Preservation Planning
Nebraska	*Bob Puschendorf*, Deputy SHPO
Nevada	*Rebecca Palmer*, SHPO
New York	*Amy Facca*, Outreach and preservation planner
Oklahoma	Melvena Hiersch, Deputy SHPO
Virginia	*Catherine Slusser*, Senior Policy Analyst
Washington	*Greg Griffith*, Deputy SHPO

States Interviewed

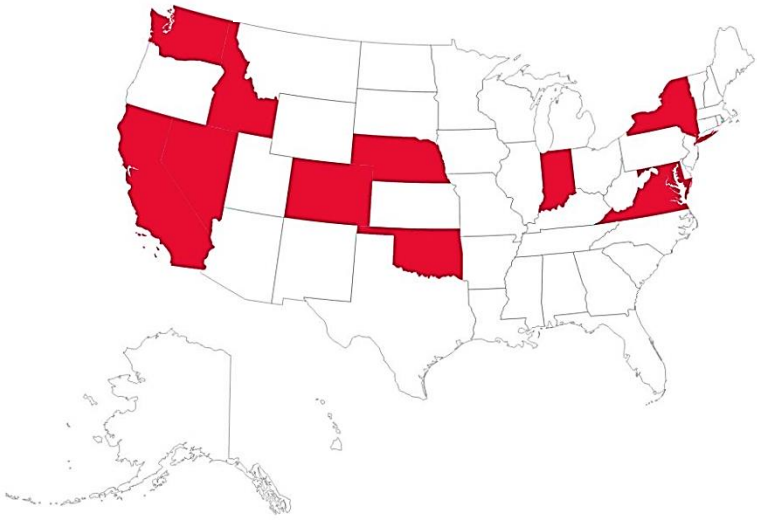


Figure 7. Interviewed states, shown in red, illustrating the geographic distribution of interviews conducted with representatives of 12 state historic preservation offices.

The following themes arose from analyzing the qualitative data collected from the online survey and in-depth interviews with 12 SHPO professionals.

State Plan morale | "What is the purpose of the Plan?"

Midwestern SHPO	"Staff would like to know **how the NPS utilizes the 50 + plans**…"
Midwestern SHPO	"**What is the purpose of it**, how do we develop it, where do we start?"
Western SHPO	"Implementation of the State Plan seems to **drop off the radar**."
Southern SHPO	"We need better clarity on who/what the plan covers…it is for the entire state, but the entity most closely following is the SHPO. How do we deal with this tension?"

Sustainable Training | "Next time, two of our people will not be on staff."

Midwestern SHPO	"We always review other states' plans to get ideas on how others have engaged the public, etc., but it would be **helpful to have a webinar**."
Northeastern SHPO	"I really like the idea of **hearing from NPS what** plans or parts of plans **they have found most impressive, useful or innovative**."
Northern SHPO	"For all of the states who are currently working on a new plan, it might be helpful to be **brought together as a group** or online forum where we are getting regular updates, training, and communication about how aspects of the plan are supposed to be developed."

Availability of SHPO Staff | "Special projects are a luxury."

Northeastern SHPO	"How to make the **process more manageable from the staff level**...or are we (the states) making the process more than it needs to be?"
Midwestern SHPO	"Although the planning process is important and worthwhile, it does come at the cost of **limiting some accomplishments in other areas** because of the amount of staff effort required."
Southern SHPO	"With a small staff **most of our time is focused on core programs** with little time left to develop new programs, publications, and policies."

Understanding NPS requirements | "That's on the website already?"

Midwestern SHPO	"I would like for NPS to **make their requirements for approval of the plan completely clear** before the SHPO begins its update process. We need confirmation that the primary purpose is to meet the needs of the respective states and to work in their own unique situations."
Northern SHPO	"[We would like the NPS to] initiate communications with states more."

1992 Report on Statewide Historic Preservation Plans

In 1992, the National Park Service, Interagency Resources Division (IRD), Preservation Planning Branch, conducted research with **33 SHPO staff in 29 states** to determine the effectiveness of the State Plans. In the 23 years since this research was conducted, many of the same critical issues that challenge SHPOs in 1992, seen below, still challenge SHPOs in 2014 – namely, low funding and inadequate levels of staffing at SHPO offices. One aspect that has increased, however, is the amount of work placed on SHPO desks, particularly Section 106 review and compliance projects.

Today, the NPS and many SHPOs are equipped with more advanced technology and communication capabilities than available in 1992, opening an avenue for advanced training and learning resources that can better assist SHPOs throughout the preservation planning process.

Critical Issues for State Plans in 1992…

Low SHPO funding, economic constraints in State
Low SHPO staff size
Inadequately trained staff
Lack of interest, limited public knowledge of historic preservation
Establishing relationships with local planners

In 1992…

36% of State Plans had been completed
- Completion dates range from 1979 to 1990.

43% of states had partially completed State Plans
- Planning process duration ranges from 4 – 64 years, average 14.4 years.

21% of states had no formal State Plan

*Numbers based on results from 28 SHPO respondents in 1992.

Recommendations from SHPO staff to NPS in 1992…

- Increase **funding** and number of **workshops** and provide **case studies**
- Offer guidance on the maintenance and **use of the inventory**, on the use of computers and "new" technology such as GIS.
- Provide **training and written materials** for land-use planners.
- Identify and distribute information on **innovative State policies**
- Increase NPS awareness of the **wide variety of planning techniques** and environments in the States and NPS should share this information
- NPS Washington Office should **promote the inclusion of historic preservation planning** in federal agency planning seminars, so that Federal planners in the States will increase knowledge.

2014 Challenges to Statewide Historic Preservation Planning

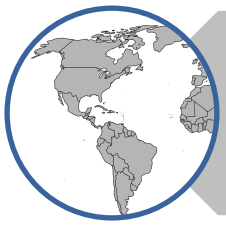
In 2014, SHPO staff identified the following themes (Figure 8) as the major challenges to developing and implementing their State Plan. While many of these themes are intertwined with outside variables, NPS can assist with targeted training, additional guidance, and innovative communication methods that will better serve the SHPOs throughout the statewide planning process.

Economy

Low state funding and a harsh economy challenges SHPO ability to travel to meetings, retain staff, hire new staff, and actively engage the public. In addition, economic inflation can diminish the value of federal HPF grants which has stayed relatively the same, or decreased.

Availability of Staff

Low staffing at SHPOs and especially an increasing number of Section 106 projects challenges SHPOs to balance duties of office demands with creating a meaningful preservation plan, often without a full-time preservation planner on staff.



Relevance

Planning for statewide historic preservation can seem distant from day-to-day preservation issues happening in local communities, increasing the difficulty of getting the public interested in contributing to the planning process.

Interest

Seemingly low general public interest in historic preservation, complex state concerns , and understanding the role of the SHPO are challenges to engaging the public throughout the planning process.

Figure 8. The identified challenges that SHPOs face in regards to developing and implementing the Statewide Historic Preservation Plan within their respective state.

Recommendations for the NPS Historic Preservation Planning Program

Goal 1: Increase Knowledge of NPS Requirements and Purpose of State Plan

1. **Objective:** *Produce additional written guidance for SHPO preservation planning staff*
    a. **Action:** Write guidance document on *engaging the public*, *formulating goals and objectives, and implementing the plan.*
    b. **Action:** Compile and distribute examples of successful plan components that meet NPS requirements.

2. **Objective:** *Produce learning resources for SHPO staff*
    a. **Action:** Create list of common or suggested survey questions for public input process that have been successfully implemented in other states.
    b. **Action:** Produce PowerPoint training slideshow for new-staff orientation about state plan history, NPS requirements and statewide planning process.
    c. **Action:** Provide information about the history of plan requirements and about benefits of effective planning efforts.

Goal 2: Increase and Strengthen Interactions between NPS and SHPO

1. **Objective:** *Initiate training for SHPO staff on key topics through a variety of learning resources*
    a. **Action:** Facilitate discussions with SHPO planning staff across states organized by groups/cohorts (based on state size, population, resource types, planning cycle) for easier group communication and state-to-state and state-to-federal collaboration.
    b. **Action:** Host *webinars* with multiple states and NPS, allowing SHPO planners to showcase their planning efforts and seek input from states and NPS colleagues.
    a. **Action:** Schedule a time with each state prior to the beginning planning cycle to talk about requirements, national trends, SHPO concerns, etc.
    b. **Action:** Host *video-conferences* with individual SHPO planning staff and NPS staff (multiple cultural resource staff on both ends), to collectively and "in-person" discuss preservation planning process and revisions.
    c. **Action:** Provide information sessions at conferences such as NAPC, NTHP, on state or regional efforts.

2. **Objective:** *Improve the frequency and process of information sharing.*
    a. **Action:** Adjust web-path to NPS website planning resources to make more intuitive for state planners.
    b. **Action:** Notify states when new material is added to website.
    c. **Action:** Encourage draft of State Plan for informal review at least 3 months prior to submitting a draft for formal review.
    d. **Action:** Encourage state to begin planning process at least 1.5 years before plan is due, to provide time for adequate data gathering and analysis, public and stakeholder engagement, and plan production.
    e. **Action:** *Email states* 1 year after plan is approved to inquire about implementation progress.

Goal 3: Encourage Creative Thinking and Transfer Innovative Ideas.

1. **Objective:** *Showcase state planning efforts through case studies*
    a. **Action:** Compile list of states that excel or overcame a challenge at various stages of the planning process.
    b. **Action:** Invite states to provide write-ups for case studies on planning efforts and provide incentive by showcasing on website and at conferences.
    c. **Action:** Provide incentive for states in the form of an acknowledgement or awards program that showcase exemplary or innovative strategies for their state in preservation planning to improve confidence and morale.

Goal 4: Improve Profile of State Preservation Planning.

1. **Objective:** *Report to the Secretary of the Interior's Office on the needs of SHPOs regarding statewide historic preservation issues, threats, and opportunities.*
    a. **Action:** Compile **summaries of State Plans** (ask of SHPOs as part of Plan) every 2 – 5 years and turn that into a **report for the Office of the Secretary** on the needs and conditions of SHPOs (funding/availability of staff)

    b. **Action:** Routinely communicate effectiveness of SHPO work to Director of NPS and Secretary of the Interior, and convey administrative concerns in states that hinder further success.

Acknowledgements

This report, *SHPO Perspectives: Program Analysis of Statewide Historic Preservation Planning,* could not have been possible without the voices of the dedicated staff at all state historic preservation offices across the country. Their participation in and enthusiasm for this research has significantly improved the NPS Historic Preservation Planning Program in understanding the challenges SHPOs face during the planning process. Their feedback and input will help focus the program's efforts to provide timely, relevant, and engaging guidance in years to come.

We are also thankful for the collaborative efforts of our colleagues in the NPS State, Tribal, and Local Plans & Grants Division, who offered valued insights and advice throughout this research. A special thanks to the current Historic Preservation Planning Program manager, Tanya Gossett, for initiating this research and providing knowledgeable guidance on preservation planning, and to fellow NCPE intern Jenna Dublin, for providing helpful feedback throughout this summer project.

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