

Ruth Pierpont, President  
National Conference of State Historic Preservation Officers and  
Director, Division for Historic Preservation, New York State Office of Parks Recreation and  
Historic Preservation  
Testimony for the  
U. S. House Committee on Natural Resources  
Subcommittee on National Parks, Forests, and Public Lands  
Rep. Raul Grijalva, Chairman  
May 25, 2010

“Building on America’s Best Idea: The Next Century of the National Park System”

Thank you Chairman Grijalva, Ranking Member Bishop, and members of the House Subcommittee on National Parks, Forests, and Public Lands for the opportunity to provide testimony. The National Conference of State Historic Preservation Officers, and State Historic Preservation Officers around this nation were gratified that the *National Parks Second Century Report* contains a strong historic preservation component, including recommending full funding from the Historic Preservation Fund. As the report states, “Our nation is best armed to address the future with a public knowledgeable about its history, its resources and the responsibilities of citizenship.”

We encourage the Committee to enact the recommendations, particularly authorizing full, permanent, and guaranteed funding for the Historic Preservation Fund.

### **Conservation continuum**

The conservation of our Nation’s historic and natural resources occurs along a continuum. At one end, the conservation occurs through the National Park Service (NPS) ownership of our national parks. At the other end, the NPS accomplishes conservation by assisting others in preservation. The NPS achieves preservation under the National Historic Preservation Act (NHPA) through the State Historic Preservation Offices (SHPOs). The Nation’s historic resources are best served when the federal government supports all components of the continuum. Fulfilling the promise of fully funding the Historic Preservation Fund will balance the continuum at the assistance end.

No Nation has the resources to buy and maintain in perpetuity every historic place. However, America’s conservation continuum does allow this Nation to preserve, or consider preservation, of every historic place.

**Conservation continuum includes economic development**

I am grateful for this chance to discuss a NPS program that is not always thought of when national parks are mentioned, but is one of our country's most successful conservation efforts as well as a prolific economic and job creation tool – the historic preservation program created by the 1966 National Historic Preservation Act. Through identification and designation mechanisms millions of historic buildings and sites are preserved by their owners at no cost to the federal government. On the economic development side, this program has stimulated over \$85 BILLION in private historic rehabilitation investment, created 1.8 million jobs (average around 60,000 a year),<sup>i</sup> and created over 187,088 units of low and moderate income housing.

**SHPOs proven ability**

We are pleased to see that the Second Century commissioners agreed with the 2007 National Academy of Public Administration's (NAPA) report that our nation's historic preservation program is a success. The 2007 NAPA report stated that the "National Historic Preservation Program stands a successful example of effective federal-state partnership and is working to realize Congress' original vision to a great extent."<sup>ii</sup> The Second Century commissioners believe that the preservation model should also be brought to the natural resource community for its effectiveness in program and assistance delivery.<sup>iii</sup>

Several additional studies support NAPA and the Second Century Report recommendations. In 2003, the Office of Management and Budget's Program Assessment Rating Tool (PART) gave management of our nation's historic preservation programs a score of 89%, indicating exemplary performance of mandated activities. The 2006 Preserve America Summit's Improving the Historic Preservation Infrastructure Committee report identified a severe need for full and permanent funding for the Historic Preservation Fund and for a comprehensive national inventory of historic properties.

**NCSHPO Comments on Six Report Recommendations:**

*1. The Congress of the United States - should fully fund the historic preservation fund to allow the Park Service to provide financial and technical assistance to state, tribal, and local governments and others to ensure that America's prehistoric and historic resources are preserved.*

**WHY FULL FUNDING?**

In 1976 the National Historic Preservation Act was amended to create a funding stream, called the Historic Preservation Fund (HPF), to implement the national historic preservation program on behalf of the Department of Interior. Currently, \$150 million is deposited annually into HPF however the actual appropriated amount is less than half the annual deposit, theoretically leaving an unappropriated balance of \$2.7 billion in the HPF.

Like the Land and Water Conservation Fund, HPF income derives from off shore oil lease revenues. A portion of these Outer Continental Shelf (OCS) revenues, from the depletion of non-renewable resources, should result in the creation of a permanent legacy that benefits all

Americans, in EVERY zip code, in terms of enriched parks, recreation, open space, and human habitat - the historic neighborhoods and Main Streets where people live and work.

The Second Century Report recommends permanent and consistent appropriations from the HPF. America's historic places are threatened. The stewards of our entire patrimony, SHPOs are starved – after decades of continual increased workloads and responsibility. Limited HPF withdrawals have forced SHPOs to meet federal regulatory demands, rather than proactively addressing historic resource needs. SHPO funding has yet to reach the heyday of funding when they received \$137 million (inflation adjusted 2009 dollars) in 1979.

The NHPA created a comprehensive, rational approach to historic preservation based on historic values and public input. States identify the historic places within their boundaries and, with the involvement of the public, produce a historic preservation plan to set priorities. Fully funding the HPF will allow SHPOs to raise matching funds and meet historic preservation needs in cooperation with local governments, nonprofit organizations, and property owners. In establishing the program, Congress understood that states are in the best position to have knowledge about the full range of historic properties and to make decisions in accordance with local needs and conditions. The mechanism is in place, but America is still waiting for the funding to make the mechanism work.

What would a fully funded program look like?<sup>iv</sup>

- Finish the identification of America's historic resources. All of America's historic resources would be identified, surveyed and records digitized. Not only would this speed up the federal review process but also help communities properly plan for their revitalization and economic development projects.
- Double National Register nominations. More historic sites in economically disadvantaged areas would be added to the National Register, bringing the Department of Interior's community assistance program into every American neighborhood. SHPOs would have the staff and time needed to assist people in these communities with National Register nominations.
- Save more commercial buildings as SHPOs have the ability to educate property owners in difficult to develop areas on the advantages (economic and "green") of rehabilitation. More support would be provided to the Federal Rehabilitation Tax credit program, creating quicker project reviews and supplying much needed technical assistance. In 2009, the tax credit program created over 70,000 jobs and leveraged \$4.7 billion in private investment.<sup>v</sup>
- Federal agencies would include historic preservation values in project planning from their desk tops with digitized historic data, speeding up the federal historic reviews and National Register nomination process.
- At risk historic places would receive matching grants for restoration in every State in the Union. Bricks and mortar grants would be available and restoration funding would be distributed equitably and according to State priorities.
- Assistance to local governments would increase tenfold from their current \$4 M set-aside. Certified Local Government (CLG) historic preservation commissions would receive funding increases, enabling CLGs to expand the program nationwide as well as create and expand upon their local preservation programs and protection of local resources. Project examples include a CLG Michigan job training program on restoring windows and a

Maryland Historical Trust's historic home audit energy efficiency initiative being conducted with four Maryland CLG's communities.

- Historic places would be prepared for disasters. A historic preservation disaster fund could be created eliminating the need for additional funding for preservation when natural disasters strike. Current climate change legislation creates a natural resources adaptation fund, a similar fund is needed for historic and cultural resources.

In 1976 Congress made a promise to the American people that preserving our nation's historic heritage was a priority and that they would provide the tools and resources to enable Americans citizens to preserve their history. In the 34 years since, Congress has not once fulfilled that promise. Now is the time to honor that national commitment and fully fund the Historic Preservation Fund.

*2. The Congress of the United States – should promote access to historic preservation technical assistance, grants, and tax incentives by residents of high-poverty areas across the country.*

### **Everyone's Heritage is Important**

Historic places tell of our diverse roots and our common adventure. They impart an indelible sense of the profound truth of the American motto: "out of many, one". As NPS's publication - *African American Historic Place*<sup>vi</sup> states -

"Equally important is the history of ordinary people as recorded in churches, social institutions, schools, banks, businesses, houses, neighborhoods, and archeological sites. (National Register) Listing honors the property by recognizing its importance to a community, a state, or the nation. About 76 percent of listed properties are privately owned and usually not open to the public, but many are within historic districts that can be visited; others are publically owned and open to the public. A visit to any of these historic places can illuminate the lives of countless ordinary people. Most historic places in the National Register are recognized for their local significance and are especially suited for telling the grassroots story. Many minority historic sites bear witness to the strength and endurance of ordinary people and to their relevance for our understanding of the complex American experiences. An appreciation of our multifaceted history provides a usable, more recognizable past that holds relevance for the masses of Americans who presently do not consider themselves a part of American history. Historic districts and properties provide a foundation for ordinary people to rediscover portions of the American past missing from much of the history taught in our educational institutions."

Of the nation's over 12,000 historic districts, comprising over a million contributing structures, 60 percent overlap census tracts in which the poverty rate is 20 percent or greater. Currently, very limited or no assistance is available to most of these communities to manage their historic resources. SHPOs have the expertise but not the funding to provide the on the ground assistance needed to help preserve these important places.

Oftentimes, the majority of historic structures in these historic districts are listed on the Register at the state or local levels of significance, making them ineligible for Save America's Treasures restoration funding. Until SHPO funding is restored to a level that would allow for restoration grants, historic structures in high-poverty areas will continue to deteriorate and may be lost forever.

Given adequate resources, SHPOs have the skills and ability to provide technical assistance, advice, and educational programs to municipalities and preservation organizations to develop preservation plans, establish local historic district ordinances, investigate alternatives for preserving key buildings, and explore strategies for promoting heritage tourism and commercial and neighborhood revitalization. However, these services are being scaled back every year as State budgets are being slashed and federal regulatory review requirements are continually increasing, leaving SHPOs unable to consistently provide preservation services and incentives to underserved communities.

Historic rehabilitation tax credits are great but only as far as they go. The credits help only depreciable structures located in areas that already have a strong real estate development potential. The rehabilitation credits provide no help to archeological sites, churches, vessels, historic landscapes, house museums, not for profit owned buildings, historic residential homes etc. What would happen if future archeologists came back to study twentieth century America and found only commercial buildings from "elite" communities?

Our American experiences are not all the same, but they are all significant and necessary to America's complete story. When provided the means, SHPOs have the infrastructure in place to ensure America's complete story can be told forever.

### *3. The National Park Service –*

*should enhance funding for, and make full use of, its extensive portfolio of community assistance programs to better support state and local governments, tribal and private-sector conservation and preservation efforts.*

### **Fully Engage All Communities in Their Heritage**

Citizens recognize that the historic places close to home are also part of the heritage of the nation as a whole. At a time when mass media, mass production and mass marketing push our communities toward faceless homogeneity, historic places remain the signposts that distinguish one place from another. Not only are historic places a source of pride for community residents, they are a more fundamental mooring that allows us to know that where we live is not just a dot on a map, but a place with its own past, present, and future of which we are a part.

The Federal-State partnership created through the historic preservation program was designed to engage communities in preservation. In 1980 Congress amended the National Historic Preservation Act requiring that each state pass through 10 percent of its annual grant to local governments certified as having outstanding local historic preservation programs. Since 1980, over 1,700 local governments have chosen to participate, more for the recognition than for the money (CLG grants average around \$8,000). Each Certified Local Government (CLG) establishes its own volunteer commission and enacts a preservation ordinance that defines that

localities preservation program. CLGs exert control over the local National Register nominations and, at times, the federal preservation review process within their jurisdictions.

In Michigan, a SHPO grant to a Certified Local Government (CLG) created a historic wood windows restoration workshop. The workshop provided specialized training to the unemployed and in the process educated individuals about the energy efficiency benefits of rehabilitating rather than replacing historic wood windows. This workshop, free of charge to participants, resulted in four of the fourteen students starting their own window repair small businesses, and the program was such a success that more workshops are being offered in 2010.

The federal government does not, nor should it, own all the places connected to our history. Mount Vernon in Virginia and the Garden District in New Orleans are as much a part of our heritage as Independence Hall or the Grand Canyon. The federal interest in heritage conservation is one of assistance, not one of acquisition. As a team effort, historic preservation reaches conservation goals with the private sector and state and local governments. Federal ownership, or acquisition, does not play a role in the national program. Historic preservation is based on the premise of offering an alternative which people may or may not choose.

#### *4. The National Park Service –*

*should develop a Cultural Resources Initiative that includes a multi-year strategic effort to prepare the Park Service's heritage preservation and cultural programs to meet the challenges of the new century – both in the parks and in communities nationwide.*

#### **Heritage conservation and change**

Historic preservation is not mere reverence for the past; it is a tool for managing change. Historic preservation means making a thoughtful effort to meet today's needs in ways that also retain and use our important historic resources. SHPOs play a leading role in the National Park Service's cultural programs. Any new strategic effort should include fully funding the HPF as well as a clear goal for historic site survey and records digitization to identify and record America's significant historic properties.

*5. The Congress of the United States –  
should reauthorize the national park system advisory board.*

### **Advisory Board**

The NCSHPO was pleased to see that Secretary Salazar has appointed a new 12 member National Park System advisory board to help lead NPS preparations for the challenges that lie ahead and that eight of the new members served as commissioners on the Second Century Commission Report. The NCSHPO is also pleased that the advisory board includes Ron James, Nevada SHPO.

*6. The President of the United States –  
should identify bold and achievable goals for preserving the nation's heritage resources.*

### **Historic Preservation = Sustainability**

America has many stories to tell - stories about wars, inventions, disasters, expansion, politics and most importantly – stories about the American people. Some of these stories make us feel good; others make us want to hang our head in shame. Destroying the places of these stories, or “human habitat” ensures that future generations will be condemned to American history memory loss. Human beings are a part of the environment and created much of our nation’s history. Wilderness and park land recreation sites cannot exist unless people have places to live and work. Having a robust and growing national historic preservation program will ensure the preservation of our built and natural environments.

Historic preservation should also be a goal of our Nation’s sustainability and livability agendas.

Sustainability - the conservation and improvement of our built resources, including the reuse and greening of existing building stock, and reinvestment in existing communities is crucial in mitigating climate change.

- In terms of waste, construction of an average 2,000-square-foot home generates 3,000 pounds of wood, 2,000 pounds of drywall and 600 pounds of cardboard.
- Moreover, the construction of an average single-family home generates four pounds of waste per square foot. On average, only about 20%-30% of that waste is recycled or reused.
- Additionally, it takes a lot of energy to construct a building – for example, building a 50,000 square foot commercial building requires the same amount of energy needed to drive a car 20,000 miles a year for 730 years. Construction debris accounts for 25% of the waste in the municipal waste stream each year.
- Demolishing 82 billion square feet of space will create enough debris to fill 2,500 NFL stadiums.<sup>vii</sup>

Livability - historic preservation is also proven to be one of the best tools to preserve a neighborhood’s livability by providing a sense of place and then to leverage that authenticity for new investment, tourism and smart growth. Historic preservation takes advantage of streets, services, infrastructure and buildings, helping to curb sprawl and promote sustainability. Many historic neighborhoods were designed to provide multiple transportations for its residents such as walking, biking, and using public transit.

By setting bold new goals for preserving our nation's historic resources, the President will be investing in the health, knowledge and history of our nation's future.

**Conclusion: Equal Support for all parts of the conservation continuum**

SHPOs and the HPF support the nation's historic preservation infrastructure; knowing the location and records of historic resources; an evaluation process to determine relative significance; a formal liaison and partnership relationship with local governments in preservation; advice and oversight on rehabilitations encouraged through federal income tax incentives; educational programs on preservation, such as on the protection of archeological sites; and assistance to the private sector on preservation techniques. This infrastructure is maintained for the national government by the State Historic Preservation Officers.

America's patrimony is not owned by the National Park Service or the National Trust for Historic Preservation. Only the State Historic Preservation Officers have the entire nation's patrimony under their purview and responsibility. As the NPS enters its second century, we should remember that for nearly half a century the SHPOs have been saving America's treasures and producing results that benefit ALL of America's citizens, communities, and States. The combination of federal leadership and State execution has worked well. Today, with America's natural and built environment being threatened, it is time for Congress to reaffirm the partnership that has worked so well. It is time to give the States the tools to do the job the National Historic Preservation Act's visionary framers intended.

---

<sup>i</sup> First Annual Report on the Economic Impact of the Federal Historic Tax Credit. Rutgers University Edward J. Bloustein School of Planning and Public Policy. March 2010.

<sup>ii</sup> National Academy of Public Administration "Back to the Future: A Review of the National Historic Preservation Program" Findings and Recommendations. pp 1.

<sup>iii</sup> National Parks Second Century Commission "Advancing the National Park Idea " pp. 29.

<sup>iv</sup> A fully funded HPF, would also provide the growing number of Tribal Historic Preservation Officers with adequate funds for staffing and programs.

<sup>v</sup> 2009 National Park Service Federal Rehabilitation Tax Credit annual report.

<sup>vi</sup> *African American Historic Places*. Introduction by Carol Shull. National Park Service 1994.

<sup>vii</sup> National Trust for Historic Preservation.