

Briefing Book

HISTORIC RESOURCES
of the
NATIONAL PARK SYSTEM

National Park Service
Office of Archeology and Historic Preservation
Washington, D. C.

June 1973

NATIONAL REGISTER AND NATIONAL PARK SYSTEM

Rationale

National Register: Listing of districts, sites, buildings, structures, and objects significant in American history, architecture, archeology and culture. Significance may be national, state, or local.

Historical areas of National Park System: As historic places of national significance, all are automatically included in the National Register.

Natural and Recreational Areas of National Park System: All historic properties in these areas that meet National Register criteria must be included in the National Register.

National Park Service Management System:

- + For land management purposes, NPS master plans incorporate Federal land classification system.
- + Class VI land is historical and cultural.
- + Class VI land as delineated in the master plan is managed according to the NPS "Administrative Policies for Historical Areas."
- + Since internal NPS management systems for historic properties must reflect national law and policy, Class VI lands and National Register listings should be the same.

Procedure

Regional Directors are responsible for identifying and nominating eligible historic properties to the National Register.

Historical areas are automatically included but must nevertheless be described on National Register nomination forms.

Historic resources (usually of less than national significance) of natural and recreational areas must be identified and nominated.

Where Class VI land has not been clearly defined: National Register nomination serves as the basis for precise definition when the master plan is next revised.

Where Class VI land has been well defined: National Register nomination should reflect the Class VI definition unless this definition is not in accord with National Register criteria. Where a larger or smaller definition seems warranted by the criteria, the nomination should reflect this judgment and the Class VI designation adjusted in the next master plan revision.

Withholding of nominations: No property that meets National Register criteria may be withheld from nomination for management, planning, or other reasons. If there are such reasons why a qualified property should not be preserved, it should nevertheless be nominated and then subjected to the means established by law and executive order for resolving such questions--i.e. the Advisory Council's Section 106 procedures. The judgment of the individual manager should not be substituted.

Coordination with States: Regional Directors permit State Historic Preservation Officers 90 days on which to comment on proposed nominations. Comments should be seriously considered but are not binding. Regional Directors bear judgmental responsibility.

Review of Nominations: Nominations from Regional Directors are subjected to the same scrutiny in the Office of Archeology and Historic Preservation as State nominations. Those that do not meet prescribed standards are returned to NPS regions the same as to the States and other Federal agencies. Those that are acceptable are entered in the National Register.

LIST OF CLASSIFIED STRUCTURES

Rationale

Historic Structure: Any work of man consciously created to serve some form of human activity--e.g. buildings, dams, canals, bridges, stockades, earthworks, Indian mounds, gardens, roads, mill races, ponds, etc.

Historic structures are the most numerous and important of the various types of historic resources of the National Park System. NPS is charged with the preservation of thousands of historic structures.

For internal management and programming and for compliance with law and executive order, NPS must know:

- + what historic structures are in its custody,
- + what their significance is,
- + what is to be done with them,
- + how much they will cost.

List of Classified Structures is the tool for accomplishing this definition. LCS:

- + identifies each structure by name and number,
- + records its order of significance (first, second, and third, corresponding roughly with national, state, and local),
- + establishes level of treatment (preservation; complete, partial, or adaptive restoration; reconstruction),
- + indicates estimated cost of treatment.

Park

The List of Classified Structures is maintained by the ~~Office of~~ Archeology and Historic Preservation.

Assistant Director for

Procedure

Since structures are one of several types of historic resources to be entered in the National Register, development of the LCS is tied to the process of nomination to the National Register.

For historic structures to be added to the LCS, the Regional Director simply supplies, on the National Register nomination form, the additional information needed for internal management purposes, such as order of significance, level of treatment, and estimated cost.

Washington

In the ~~Office of Archeology and Historic Preservation~~, all nominations go through the LCS Registrar who extracts LCS data before forwarding nomination to the Keeper of the National Register.

HISTORIC PRESERVATION IN THE NATIONAL PARK SYSTEM

DOCUMENTARY CHRONOLOGY

1. October 15, 1966
National Historic Preservation Act

Directed Secretary of the Interior to maintain and expand National Register of Historic Places as the official national protective list of cultural properties worthy of preservation.

Established mechanism for assessing the public benefit when a registered property is threatened by a federal or federally assisted undertaking.

2. 1968
"Administrative Policies for Historical Areas of the National Park System."

Defined various classes of historic resources of the National Park System and established policies for their management.

Established List of Classified Structures.

Prescribed land classification system for master plans to include Class VI designations (historical and cultural) in historical, natural, and recreational areas.

3. October 10, 1968
Memorandum from Director Hartzog to Field Directors:
"Historic Buildings"

Pointed out incongruity of NPS demolishing historic buildings inside the parks while opposing demolition of equally meritorious buildings outside the parks.

Established requirement that no structure more than 50 years old could be demolished without Director's personal approval and no structure of historical value less than 50 years old without approval of Director, Office of Archeology and Historic Preservation.

4. March 10, 1969
Memorandum from Associate Director Jensen
to Field Directors: "Historic Resources
of the National Park System"

Directed field management to prepare National Register nominations for historical areas of National Park System and for historic resources of the natural and recreational areas.

Established identity between National Register entries and Class VI land designations in master plan.

Urged coordination with State Historic Preservation Officers.

Provided guidelines for carrying out assignment and for executing National Register forms.

5. March 13, 1971
President Nixon's Executive Order 11593
"Protection and Enhancement of the Cultural Environment"

Directed all Federal land management agencies (including NPS) to:

Inventory and nominate qualified properties to the National Register by July 1, 1972.

Exercise special care in the interim to avoid harm to potentially qualified properties.

Adopt measures to insure preservation of registered properties.

Submit preservation procedures annually to Secretary of the Interior and Advisory Council on Historic Preservation.

Directed Interior to:

Work with agencies to develop direct nomination procedures.

Expedite action on agency nominations.

Directed Interior to (continued):

Foster cooperation and coordination between Federal Representatives and State Historic Preservation Officers.

Provide technical information on preservation.

Advise and assist agencies in specific preservation problems.

6. August 6, 1971

Memorandum from Acting Director Freeman to Field Directors:
"Nomination of Historic Properties to the National Register;
Compliance with Executive Order 11593."

Transmitted Executive Order 11593.

Directed inventory and nomination of qualified properties in National Park System to National Register in accord with Executive Order 11593.

Stressed need for NPS to serve as a model for other agencies in carrying out intent of Executive Order 11593.

Enclosed extracts from Jensen memorandum of March 10, 1969 (see 2, above).

7. December 21, 1971

Activity Standards for Professional Services.

Established standards and procedures for application of "Administrative Policies for Historical Areas." Specifically:

Reemphasized identity between Class VI land and National Register entries.

Prescribed content of and procedures for developing List of Classified Structures.

8. March 16, 1972

Workshop in Washington Office for regional personnel on preparation of National Register forms.

9. July 12, 1972

Memorandum from Director, Office of Archeology and Historic Preservation, to Field Directors: "Classified Structures Reporting"

Provided guidance of application of activity standards to LCS submissions.

10. August 16, 1972

Memorandum from Director Hartzog to Field Directors: "Reclassification of Class VI Lands."

Cautioned on trend of master plans to reclassify Class VI lands in order to permit development.

Pointed out implications of reclassification in terms of Section 106 of National Historic Preservation Act and Executive Order 11593.

Repeated rationale of law and regulation concerning National Register and Class VI land.

11. August 16, 1972

Memorandum from Director Hartzog to Field Directors: "Historic Buildings."

Expressed belief that spirit if not the letter of the National Historic Preservation Act, Executive Order 11593, and Director's memorandum of October 10, 1968, too often evaded.

Pointed out necessity for NPS, in caring for historic properties in its custody, to set a model for other agencies.

Enclosed copy of Executive Order 11593.

12. July-September 1972

Workshops for Federal agency personnel, including NPS, on identification and nomination of National Register properties conducted by OAHP at Philadelphia, Denver, Fort Worth, Atlanta, Seattle, San Francisco, Kansas City, Chicago, and Providence.

13. January 26, 1973
Memorandum from Director Walker to Field Directors:
"Historic Buildings"

Emphasized importance of compliance with Executive Order 11593.

Modified existing policy to permit demolition of buildings more than 50 years old on authority of Associate Director, Professional Services, and buildings of historical value less than 50 years old on authority of Regional Director.

14. February 21, 1973
Memorandum from Director, Office of Archeology and Historic Preservation, to Field Directors: "Status of List of Classified Structures."

Status report to Regions on progress of LCS.

Call for additional data on specific properties.

Reiteration of activity standards as guide for LCS submissions.

15. March 2, 1973
Regional Directors' Meeting in Washington

Connally and Utley explained need for expediting nominations as directed by Executive Order 11593 and importance of LCS for meeting needs expressed by Secretary Morton.

Stressed that quality of nominations submitted to date from NPS field management suffered in comparison with State nominations and would have to be returned.

16. March 5, 1973

Memorandum from Associate Director Connally to Field
Directors: "List of Classified Structures"

Stressed Secretary Morton's personal concern
for preservation of historic structures in
the National Park System.

Reiterated applicability of 1971 activity
standards to development of LCS.

Explained guidelines and requirements for
LCS submissions.

Set July 1, 1973, as target date.

17. April 12, 1973

Memorandum from Director, Office of Archeology and Historic
Preservation, to Field Directors:
"National Register and LCS Nominations."

Transmitted additional guidance to field:

Suggestions and instructions for preparing
National Register forms for Class VI land
and for submissions to LCS.

Answers to questions most frequently asked.

Sample LCS form.

Sample National Register form.

18. January 25, 1974

Federal Register

Published by Advisory Council on Historic Preservation

"Procedures for the Protection of Historic and
Cultural Properties"

19. December 18, 1973, and February 21, 1974
Memoranda from Director Walker to Field Directors et al.:
"Historic Preservation"

12/18/73: Announced split of OAHP & PHP
Importance of preservation and priority
over reconstruction
Need for progress in compliance with EO
Need to fill Regional professional staffs

2/21/74: Identified problem areas in NPS preservation:
Application of policies and standards
Use of professional personnel
Scarcity of trained personnel
Contract procedures
Misplaced funding priorities

20. April 18, 1974
Memorandum, Associate Director, Professional Services,
to Field Directors: "Procedures of the Advisory Council
on Historic Preservation"

Guidelines for application of Advisory
Council procedures under Section 106 and
E.O. 11593

COPY

MAR 10 1969

H30-IH

Memorandum

To: Regional Directors, Midwest, National Capital, Northeast, Southeast, Southwest, and Western Regions, and District Director, Northwest District

From: Associate Director

Subject: Historic Resources of the National Park System

The National Historic Preservation Act of 1966 authorized the Secretary of the Interior to expand and maintain a National Register of districts, sites, buildings, structures, and objects significant in American history, architecture, archeology, and culture. Ultimately the Register will consist of places of state and local significance as well as national significance. As places of national significance, all historical areas of the National Park System and all National Historic Landmarks are already listed in the Register. It is now necessary to prepare National Register forms for the historical areas and to identify, define, and prepare forms for the historic resources of the natural and recreational areas.

The administrative policy statement for the historical area category of the System provides that the historic resources of the natural and recreational areas be managed according to the historical area policies. The adoption of these policies likewise requires more precise definition of the historic resources of the natural and recreational areas.

We anticipate that the environmental concept of historic districts will take on increasing importance in this definition as it is in the broader national preservation program and movement. Such a district, with delineated boundaries, would be managed according to the historical area policies and would also be entered in the National Register and be subject to the provisions of the National Historic Preservation Act.

Sound planning and management require that these historic resources as entered in the National Register coincide with the lands and resources designated Class VI, historical and cultural, in the Land Classification Plan. Accordingly, the three administrative policy brochures will be revised to provide that lands and resources designated Class VI are districts, sites, buildings, structures, and objects significant in American history, architecture, archeology, and culture as measured by the National Register criteria set forth in the National Park Service Grants for Historic Preservation: Guide to State Participation. Also, the Park Planning Handbook now in preparation will provide that, as part of the master planning process, these lands and resources be described and defined on National Register inventory forms as well as in the Land Classification Plan and that they be formally entered in the National Register upon approval of the master plan.

Meanwhile, it will be necessary to relate existing Class VI designations in areas with approved master plans to the National Register. This responsibility may be assigned to the superintendent of each area or may be carried out by the professional staff of the Regional Office. Where special problems are encountered, the Chief, Office of Archeology and Historic Preservation, may be called upon for advice or assistance. The inventory forms, Form 10-300 and 10-301, may be ordered from that Office.

Several conditions may be expected to prevail as the task gets underway:

1. The existing Class VI designation is precisely delineated and judged to be adequate to encompass the historic resources and their immediate setting. This of course is the ideal situation, and the inventory may be prepared to conform exactly to the Class VI delineation.
2. The existing Class VI designation is precisely delineated, but the limits are judged either too restrictive for proper preservation of the historic resources and their setting or more generous than necessary for this purpose. In this situation the inventory should be prepared to coincide exactly with the Class VI delineation but should be accompanied by recommended boundary changes and an explanation of the bases of the recommendation.
3. The Class VI designation is general or obscure--e.g. represented only by a dot on the map. In this situation the form should be prepared to delineate boundaries judged necessary for adequate preservation of

the historic resources and their setting and should be accompanied by an explanation of the process by which the recommended boundaries were conceived.

4. Historic resources exist that meet the National Register criteria but that were not accorded Class VI status when the master plan was prepared. (This condition also prevails in areas with master plans approved before adoption of the ORRRC land classification system.) In this situation inventory forms should be prepared to show your recommended definition of historic resources and their proper setting.

In recommending Class VI designations for unclassified lands and resources, in recommending boundaries for vaguely defined Class VI areas, and in recommending new limits to existing Class VI areas, please bear in mind the desirability of making full use of the historic district concept wherever applicable. This concept is relevant where the historic resource is an ensemble of historic buildings (e.g. Fort Yellowstone, the headquarters area at Yellowstone National Park), where it is a sizable tract of historic terrain (e.g. Modoc War battlegrounds at Lava Beds National Monument), and where it is one or more historic buildings that require a sizable tract of associated nonhistoric terrain for environmental purposes (e.g. Cade's Cove at Great Smoky Mountains National Park).

The inventory forms should be forwarded to the Chief, Office of Archeology and Historic Preservation. After professional review in this Office, those fitting the situation described in 1, above, will be entered in the National Register. Those in situations 2, 3, and 4, above, will be transmitted to the Assistant Director, Cooperative Activities, together with the professional recommendations of the Chief, Office of Archeology and Historic Preservation, for resolution and approval as part of the master planning process.

The Governor of each State has appointed a State Liaison Officer for the national historic preservation program. Among other responsibilities, these officials are charged with the conduct of statewide surveys and the nomination of properties of state and local significance for inclusion in the National Register. (The nominations, of course, are subject to approval by the Chief, Office of Archeology and Historic Preservation, to whom the authority to enter properties on the Register has been delegated.) The State Liaison Officer's survey responsibilities are statewide and encompass lands managed by Federal and State agencies

as well as private property. Superintendents may therefore be approached by a State Liaison Officer attempting to organize his statewide survey and inviting cooperation with respect to historic properties in natural and recreational areas of the National Park System.

In all such instances, it should be explained to the State Liaison Officer that the necessity of insuring compatibility of National Register listings in National Park Service areas with ORRRC's nationwide land classification system, with the designation of lands to be managed according to the Service's administrative policy compilation for the historical area category, and with our master planning process require that we undertake our own surveys under the National Register criteria. The State Liaison Officer's advice and assistance in the undertaking is invited if he wishes to extend it. Or if he wishes to make an independent survey and nominations, that too should be permitted; any differences between our own findings and those of the State may be reconciled in the review process by the Washington Office described above. Or, finally, the State Liaison Officer may (and probably will) simply wish to concentrate his effort elsewhere and not expend resources duplicating our own surveys. In any case, copies of the inventory forms covering properties in the natural and recreational areas will be provided the State Liaison Officer by the Washington Office when they are formally entered in the Register.

Sample completed inventory forms for the Savannah Historic District, a National Historic Landmark, are enclosed for your guidance, together with instructions for their preparation.

(SDG) J. E. N. JENSEN

Enclosures

Redefinition of Class VI
Lands for Administrative Policy Brochures

Class VI lands are those on which are located the historic resources (structures, sites, or objects) that warranted the establishment of the historical area as a unit of the National Park System. Historic resources worthy of identification and preservation may also be found in natural and recreational areas of the National Park System.

Resources designated Class VI are districts, sites, buildings, structures, and objects significant in American history, architecture, archeology, and culture as measured by the National Register criteria set forth in the National Park Service Grants for Historic Preservation: Guide for State Participation. Class VI lands and the resources thereon are entered in the National Register of Historic Places maintained by the National Park Service pursuant to the Historic Sites Act of 1935 and the National Historic Preservation Act of 1966 and are subject to the provisions of the latter Act (see Appendix--/to be supplied/ for pertinent provisions and criteria and procedures adopted by the Advisory Council on Historic Preservation).

Class VI lands and resources are managed according to the policies set forth in this compilation. Physical developments are limited to those essential to preservation, restoration, if necessary, of the historical values that convey the significance of the area to the public, and such access and on-site development to accommodate appropriate use consistent with preservation. Developments shall not detract from or adversely affect historical or cultural values. Visitor activities are generally limited to sightseeing and study of the historic or cultural features. This limitation, however, shall not preclude appropriate adaptive use of historic structures of the second and third order of significance for modern utilitarian purposes. Such adaptive use is encouraged.

Insert on page 52 of
Master Plan Handbook

C. Basic data for natural and recreational areas will include such studies and surveys of historic resources as is warranted by the importance of these resources. Basic data requirements for natural and recreational areas are the same as enumerated for historical areas in (2) below. In addition, as part of the basic data, National Register inventory forms will be prepared for use by the Master Plan team as specified in Appendix _____.



United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:

H30-HH

AUG 6 1971

Memorandum

To: Directorate and all Field Directors

From: Acting Director

Subject: Nomination of historic properties to the National Register;
compliance with Executive Order 11593

Your attention is called to the memorandum of March 10, 1969, from Associate Director Jensen, subject: "Historic Resources of the National Park System." Pertinent extracts are enclosed.

On May 13, 1971, President Nixon signed Executive Order 11593, "Protection and Enhancement of the Cultural Environment." A copy is enclosed. This order directs all departments and agencies of the Federal Government to initiate programs for the preservation of historic properties within their jurisdictions, and to nominate such properties to the National Register of Historic Places by July 1, 1973. The Secretary of the Interior is to assist in compliance.

The National Park Service has major responsibilities in aiding the Secretary of the Interior to carry out the President's Executive Order. In addition the Service must inventory and nominate to the National Register its own historic resources in a way that is a model for other agencies. As historical areas of the National Park System are already on the National Register, this applies primarily to historic properties in natural and recreational areas.

Because of the need to have the National Park Service's inventory program completed to stand as a model, and to help alleviate the workload in the National Register in preparation for the expected volume of nominations from other agencies, the historic sites and structures in natural and recreational areas of the National Park System should be inventoried and nominated to the National Register by July 1, 1972.

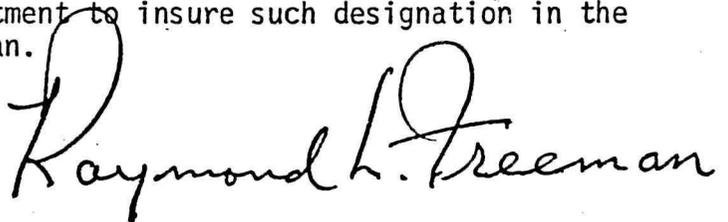
In making evaluations of significance, regional and park personnel should apply the Criteria for Evaluation for potential entries to the National Register enclosed with this memorandum. The advice of

professional members of the Offices of History and Historic Architecture in the Service Centers or of the Office of Archeology and Historic Preservation may be sought. However, there is not time for surveys or other studies to be programmed.

Historic properties should be inventoried and nominated on Forms 10-300, 10-300a, and 10-301, National Register of Historic Places Inventory-Nomination, according to instruction sheets available through the Regional Offices. For several parks, forms have already been completed by Service Center personnel as part of historic resource studies. Superintendents of such parks may use these forms in nominating historic properties to the National Register.

Superintendents should send completed forms to their Regional Offices. The Director of the Region should sign the form in the space reserved for the State Liaison Officer and forward the completed form to the Office of Archeology and Historic Preservation for final evaluation. It is of utmost importance that Directors of Regions cooperate with State Liaison Officers as required by the President's Executive Order. State Liaison Officers should be afforded the opportunity to review and comment on nominations before their submission to the Washington Office. A period of 30 days should be allowed for that purpose.

Properties nominated to the National Register must include sufficient surrounding land to protect the integrity of the historic site or structure in its environment. After historic properties have been nominated to the National Register, they will be managed as Class VI lands, entered as such in the land classification plan of the park's master plan. For nominated properties not presently designated Class VI, the signature of the Director of the Region on the National Register nomination is a commitment to insure such designation in the next revision of the master plan.

Handwritten signature of Raymond L. Freeman in cursive script.

Enclosures 3

cc:
ESC-HHA
WSC-HHA



United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:

H30-PH

AUG 16 1972

Memorandum

To: All Field Directors

From: Director

Subject: Reclassification of Class VI Lands

Drafts of some recent master plans for units of the National Park System have contained proposals to reclassify Class VI lands to other classifications, usually for the purpose of constructing park developments. Such proposals record an intent to cease managing such lands as historic properties and present the possibility of action that may impair the historic integrity of the resources. For reasons explained below, such actions constitute Federal undertakings in terms of Section 106 of the National Historic Preservation Act of 1966 or in terms of Section 2(c) of Executive Order 11593 and require the review and comment of the Advisory Council on Historic Preservation.

In considering proposals that will affect historic resources on lands administered by the National Park Service, the following definitions and determinations should be kept in mind:

(1) Historical areas of the National Park System.

Under the provisions of the National Historic Preservation Act of 1966 (80 Stat. 915), all historical areas of the National Park System are listed in the National Register of Historic Places. Section 106 of the act provides that Federal (National Park Service or other agency) undertakings affecting these National Register properties are subject to review and comment by the Advisory Council on Historic Preservation. The meaning of "effect" and the review and commenting process are set forth and explained in the Advisory Council "Procedures for Compliance with Section 106," published in the Federal Register, July 15, 1972.

In making impact judgments, the administrator of a historical area should consider any proposal to change the boundary of Class VI lands or any project that will occur within or adjacent or near to Class VI lands as



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having an effect and requiring Section 106 consultation. It is conceivable, although not likely in most historical areas, that proposed development within park boundaries on other than Class VI lands may not affect historical resources. In such cases, the park administrator shall proceed with caution and be able to demonstrate conclusively that the project will have no effect. The Advisory Council on Historic Preservation has the authority to comment upon such projects or proposals if it does not agree with the finding of no effect, and private parties may question the finding of no effect through court action.

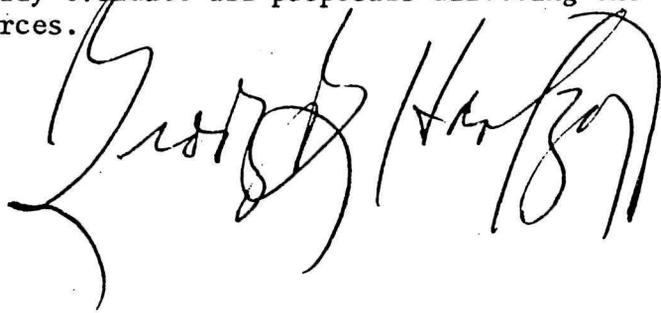
(2) National Register Properties within Natural or Recreational Areas.

A number of properties within natural and recreational areas have been placed on the National Register, through studies conducted by the National Park Service. In the park master plan, the boundary of the National Register property will appear as Class VI lands. Because the National Register property boundary and the Class VI boundary are the same, the administrator of such property within a natural or recreational area shall consider a proposal to change the boundary of the property or a project that will occur within it or adjacent to it as having an effect and requiring a Section 106 consultation.

(3) Class VI lands within Natural or Recreational areas not yet placed on the National Register.

Under Executive Order 11593 of May 13, 1971, all historic properties in Federal ownership are to be nominated to the National Register by the agency having custody. Section 2(e) of the Executive Order provides that, pending nomination, any property that might qualify cannot be sold, transferred, demolished, or altered without review and comment by the Advisory Council on Historic Preservation. For purposes of carrying out the Executive Order, it may be assumed that all Class VI lands not in the National Register are potential additions to it and will ultimately be entered. Several memoranda from this Office, most recently Mr. Freeman's memorandum of August 6, 1971, establish the identity between Class VI lands and National Register eligibility. Therefore, the administrator of Class VI lands within a natural or recreational area should consider a proposal to change the boundary of the property an alteration of a historic resource which might qualify for nomination to the National Register.

If the National Park Service is to live up to its responsibilities as custodian of the Nation's historic and cultural heritage and fulfill its role as a leader in historic preservation, its own practices must be sound and above reproach. It is therefore vital that Field Directors carefully evaluate all proposals affecting the integrity of historic resources.

A handwritten signature in black ink, appearing to read "George H. Brown". The signature is written in a cursive style with large, sweeping loops and is positioned to the right of the main text block.



United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:

H30-PHHA

AUG 16 1972

Memorandum

To: All Field Directors

From: Director

Subject: Historic buildings

In a recent staff meeting I expressed my belief that too many requests are being received from field directors for authority to demolish buildings of historical or architectural value. The National Historic Preservation Act of 1966 and Executive Order 11593 of May 13, 1971, establish national policy, and my memorandum of October 10, 1968, states Service policy and procedure. Too often, I feel, the spirit if not the letter of these policies and guidelines has been evaded.

Executive Order 11593 states that it is the policy of the Federal Government to provide leadership in preserving, restoring, and maintaining the historic and cultural environment of the Nation. I am enclosing a copy so that you may review it. The National Park Service, acting for the Secretary of the Interior, has a Government-wide mandate to provide technical advice and assistance on preservation problems throughout the United States. We cannot function in this critical capacity unless our own performance is above reproach. Therefore, it is incumbent upon us to set an example for proper preservation and use of the historical and cultural resources in our custody.

The contents of E.O. 11593 and my memorandum of October 10, 1968 (copy enclosed) should be reiterated to the field managers under your direction. No structure 50 years or older shall be razed or substantially modified without my personal approval, nor shall any structure less than 50 years old be razed or substantially modified without the review and concurrence of the Director, Office of Archeology and Historic Preservation.



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Our administrative policies encourage the retention and use of our cultural resources. The treatment of historic structures is not limited to restoration for exhibition purposes; adaptive restoration is also a valid and proper treatment and is to be encouraged. Certainly the exercise of ingenuity and creative thought in the examination of your inventory of old buildings will result in appropriate adaptive uses.

Thank you very much.

A handwritten signature in black ink, appearing to read "George H. H. H.", written in a cursive style.

Enclosures



OFFICE OF THE DIRECTOR

UNITED STATES
DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

October 10, 1968

Memorandum

To: Regional Directors, Midwest, Northeast, Southeast,
Southwest, Western, and National Capital Regions

From: Director

Subject: Historic Buildings

It has recently come to my attention that the Service is still demolishing historic structures within some of the older National Parks for the reason that the structure has deteriorated. From my personal observation this deterioration results, in most instances, from a lack of any creative effort on the part of the Service to maintain the structure in the first place.

The Service stands as perhaps the single most vital force in promoting historic preservation throughout the country. It, thus, is incongruous for us to be dismantling structures in National Parks which were they outside of National Parks we would be in the forefront of those opposing demolition.

Accordingly, hereafter no structure 50 years or older shall be razed or modified without my personal approval. Moreover, any structure less than 50 years old that is significant in interpreting the cultural heritage of a location or region shall not be razed or modified without review and concurrence of the Chief, Office of Archeology and Historic Preservation.

Your attention to this matter, and follow up with the Superintendents, will be much appreciated. Thank you very much.

cc:
The Directorate



United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:
H30-PH

JAN 26 1973

Memorandum

To: All Field Directors
From: Director
Subject: Historic buildings

This memorandum modifies previous memoranda on this subject of October 10, 1968, and August 16, 1972.

National policy governing the responsibility of Federal agencies for the preservation of cultural properties is set by the National Historic Preservation Act of 1966 and President Nixon's Executive Order 11593 of May 13, 1971, entitled "Preservation and Enhancement of the Cultural Environment." Field managers should be familiar with these documents and the guidance that has been furnished you periodically for their implementation in areas under National Park Service jurisdiction. In addition, because the Service discharges the Secretary's obligation under the Executive Order to provide advice and assistance to all Federal agencies, it is essential that we set an example of proper preservation and use of the historic and cultural resources entrusted to our care.

Henceforth, no structure 50 years or older under the jurisdiction of the National Park Service shall be razed or importantly altered without the approval of the Associate Director, Professional Services. Requests for approval shall be accompanied by sufficient documentation, including photographic, to permit an informed judgment.

All structures less than 50 years old proposed for demolition or major alteration shall be judged against the National Register criteria by a professional in the field of history, archeology, or historic architecture. Structures found to qualify shall be nominated to the National Register under the provisions of Executive Order 11593. Those that do not qualify may, on certification thereof by the investigator, be demolished or altered on authority of the Regional Director.

In exercising this authority, the Regional Director should bear in mind that all buildings that are structurally sound should be counted as assets and their space counted as part of the total inventory of space available for use. In arriving at recommendations or decisions concerning demolition, the following factors should be considered:

1. Commitments made or implied to the Administration, Congressional committees, or Members of Congress.
2. Provisions of the master plan and comments on the master plan resulting from public hearings.
3. Cost of acquisition of the property, particularly the portion of the cost attributable to the building itself.
4. Estimated cost of renovation, including moving where appropriate, compared with the estimated cost of new construction.
5. Current and anticipated needs for space--interpretive, administrative, residential, utilitarian, or other.



Ronald H. Walker
Director



United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:
H30-PHB

MAR 5 1973

Memorandum

To: All Field Directors

From: Associate Director

Subject: List of Classified Structures

Secretary Morton has recently expressed serious concern over National Park Service priorities as they relate to our program of preserving historic structures. He has asked for program and cost data which our present system of programming does not yield. It is essential as a first step toward meeting our responsibility to preserve the historic structures entrusted to our care to complete the List of Classified Structures.

The List of Classified Structures was established by the 1968 Administrative Policies for Historical Areas. Guidelines for compiling it were issued as activity standards on December 21, 1971, and appear on pages 17 and 18 of the Professional Services section of the activity standards volume. Other guidance has been issued in memorandum form from time to time. Especially pertinent is Acting Director Freeman's memorandum of August 6, 1971, Subject: "Nomination of Historic Properties to the National Register; compliance with Executive Order 11593."

Each historic structure in the National Park System should be recorded on a National Register nomination form for properties in Federal custody (Form 10-306). The form, with accompanying sheet setting forth number, name, order of significance, and proposed level of treatment, should be sent to the Director, Office of Archeology and Historic Preservation. Include, in addition to the 8x10 or 5x7 photograph required by the National Register, a 4x5 photograph for the List of Classified Structures. Orders of significance and levels of treatment should be consistent with criteria in the Administrative Policies. Refer to page 20 of the Administrative Policies for definition of a historic structure.

These instructions apply to all historic structures in the National Park System, whether in natural, recreational, or historical areas. Although historical areas are already entered in the National Register of Historic Places, individual historic structures within the historical areas must be described and listed in the List of Classified Structures.

No structure or other property that meets the National Register criteria may be withheld from nomination for management, planning, or other reasons. If there are such reasons why a qualified property should not be preserved, it should nonetheless be nominated and then subjected to the Advisory Council on Historic Preservation's procedures under Section 106 of the National Historic Preservation Act. This insures that the means established by law and executive order for resolving such questions are employed rather than the judgment of the individual manager having custody of the property.

In order to respond to the Secretary's request, we need an additional item of information not required in previous guidelines. For each historic structure, provide a preliminary cost estimate for carrying out the proposed level of treatment. Whether for restoration or preservation, the estimate should be that amount required to place the structure in a condition for routine maintenance.

We need to have the List of Classified Structures substantially complete, including cost estimates, by July 1, 1973. This is a large assignment. However, each region now has a historical architect and other professional personnel, and we suggest that their services be extensively used in this basic and vital undertaking.

Thank you for your cooperation.



Ernest Allen Connally



United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:

H30-PHB

APR 12 1973
APR 12 1973

Memorandum

To: All Field Directors

From: Director, Office of Archeology and Historic Preservation

Subject: National Register and List of Classified Structures Nominations

Enclosed is a supply of a handout publication designed to supplement previously published guidelines and instructions for preparing National Register Forms for historic resources of the National Park System and for submitting information for the Master List of Classified Structures.

In addition to narrative explanation and instruction, there is a question and answer section reflecting a sampling of questions most frequently posed by field personnel; a completed specimen of Form WASO-149 (Dec. 1970) used in the Washington Office for maintenance of the Master List of Classified Structures, and a specimen National Register of Historic Places Inventory - Nomination Form 10-306 (Oct. 1972), for a fictitious area of the National Park System, accompanied by supplemental Forms 10-300a (July 1969), 10-301 (Rev. 7-72), and 10-301a (7-72). The purpose of this specimen Nomination is to demonstrate a method of including a complex of historic structures within an area of the Service and the minimum data to be recorded for each. Please note the examples of differentiating significance recommendations and recommended treatments with preliminary cost estimates accorded individual structures. For obvious reasons, we have not included a map and photographs for our fictitious area.

Robert M. Utley

Enclosures

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
OFFICE OF ARCHEOLOGY AND HISTORIC PRESERVATION

* * * * *

SUGGESTIONS
INSTRUCTION
QUESTIONS
ANSWERS

FOR

PREPARING NATIONAL REGISTER FORMS

FOR

CLASS VI LANDS OF THE
NATIONAL PARK SERVICE

AND FOR

SUBMITTING INFORMATION FOR THE
LIST OF CLASSIFIED STRUCTURES

INCLUDING

SPECIMEN NOMINATION

AND

LCS LISTING

QUESTIONS AND ANSWERS

Following is a sampling of some of the questions posed by field personnel in their quest for information to help them identify and nominate NPS historic sites and structures to the List of Classified Structures and simultaneously to the National Register.

1. Q: WHAT IS THE "LIST OF CLASSIFIED STRUCTURES"?

A: The List of Classified Structures (LCS) is a listing of all structures in the National Park System that merit preservation because of historical, architectural, archeological, or esthetic values and that are determined to be practicable of preservation.

(Ref.: Activity Standards, Part IV, Professional Services, Sec. 2, page 17, 12-21-71)

2. Q: WHAT IS THE PURPOSE OF THE LCS?

A: The purpose of the LCS is to establish the order of significance of each historic structure as assessed by the National Park Service, to fix a level of treatment to be accorded each structure, and to provide a basis for subsequent planning, programming, and budgeting.

(Ref.: Activity Standards, Part IV, Professional Services, Sec. 2, page 17, 12-21-71)

3. Q: IF AN HISTORIC PARK AREA OF THE NPS IS ALREADY ON THE NATIONAL REGISTER, DOES THAT TAKE CARE OF NOMINATIONS FOR THAT AREA?

A: No, not for the purposes of the LCS. Identifiable historic sites and structures in any and all NPS areas, whether historic, natural, or recreational, are to be recorded on the National Register Form 10-306 for simultaneous nomination to the National Register and the List of Classified Structures.

4. Q: HOW DO WE DETERMINE THE SIZE AREA TO BE REPORTED AS CLASS VI LANDS?

A: This determination is made by the Director of the Region from the pertinent Historic Resource Study and/or other professional recommendations on which lands and resources should be designated Class VI in the Land Classification Plan.

5. Q: IN THE CASE OF MULTIPLE STRUCTURES IN A CLOSE-GROUPING, SUCH AS A HOUSE, STORAGE SHED, TOOL SHED AND PRIVY, IS A SEPARATE NOMINATION REQUIRED FOR EACH STRUCTURE?

A: No. Only one Form 10-306 is required, oriented to the complex or district as a unit, with the individual structures listed under Item 7 of the form or on 10-300a, "Continuation Sheet," providing required data for each listing - i.e., name; number; order of significance; recommended treatment; cost for same; longitude and latitude; acreage; description and photographs.



United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

December 18, 1973

OFFICE OF THE DIRECTOR

Memorandum

To: Regional Directors

From: Director *W*

Subject: Historic Preservation

As you know, in the recent reorganization of the Washington Office, we removed from the Office of Archeology and Historic Preservation all responsibilities for historic preservation within the National Park System and concentrated them in an Assistant Director for Park Historic Preservation. Bob Utley, formerly Director of the Office of Archeology and Historic Preservation, has been named to this new post.

We made this change because of a belief that our external affairs programs in historic preservation were in some respects interfering with our park responsibilities and vice versa. Also we wanted to give organizational focus and representation in the Directorate to the specialized requirements of preservation of the historic resources of the National Park System. Our care of these resources needs upgrading. Secretary Morton has spoken to me personally of his concern for improving our record in this regard.

The Secretary's principal criticism is of the preservation of historic buildings. This work is expensive and seems an intolerable strain on our limited funds. I am not convinced, however, that our priorities always give preservation of these irreplaceable resources precedence over other, less pressing projects. For example, we are programming millions of dollars in historical reconstructions--of earthworks, of living farms, of pioneer villages--which are of doubtful justification when measured by the administrative policies and which will have to be maintained by the same costly techniques that apply to the genuine article. The Bicentennial program alone contains reconstructions that will cost more than \$12 million. Meanwhile, many of our historic houses, old forts, and other structures stand in urgent need of treatment. The recent fort study team from the Denver Service Center identified \$36 million of needed work on coastal forts alone.

I am also concerned about our slow response to President Nixon's Executive Order 11593. Other agencies less able than we to carry out the President's directive are making excellent progress. We should be doing much better, especially since the List of Classified Structures, our prime tool for upgrading our care of historic buildings, is tied to the President's assignment to nominate our historic properties to the National Register. At the Regional Directors' meeting at Grand Teton last June, each of you received a binder containing all of our directives and guidelines for this program.

The administrative policies and activity standards for the study, development, and management of our historic resources reflect universally accepted principles of historic preservation. They are different from the principles governing management of natural, scenic, wildlife and other types of resources entrusted to our care. Managers and professionals alike must become better acquainted with these policies and standards and more careful in applying them.

In the long run, I feel that the most important single step you can take to meet this requirement is to build your own professional support staff in history, archeology, and architecture and so organize them that they have a continuing contribution to management decisions and programs affecting historic resources. Although the final responsibility is yours, professional judgments are an essential part of the foundation on which sound decisions are based. Such a staff, incidentally, will greatly facilitate provision of responsive professional services to the Region by the Denver Service Center.

I urge you to proceed as rapidly as possible to fill out the authorized staff of the Associate Regional Director for Professional Support.

I have asked Bob Utley and key members of his staff to schedule a meeting in each regional office in the next few months to get your reaction to these thoughts, to explore our policies, standards, and procedures with you, and to discuss any special problems you may have in your Region. I would like for you personally to participate as well as your top management and professional staff. Bob will get in touch with you shortly after the holidays to arrange a convenient time for his visit. Meanwhile, I shall appreciate your careful thought about these matters.

cc:
Manager, Denver Service Center



United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

FEB 21 1974

OFFICE OF THE DIRECTOR

Memorandum

To: Deputy Director, Associate Directors, Regional Directors,
Manager, Denver Service Center and Manager, Harpers Ferry Center

From: Director *[Signature]*

Subject: Historic Preservation

The discussion of historic preservation by the Directorate on January 11 identified five major areas in which we need to develop new measures to improve our care of the historic resources of the National Park System. Let us move as quickly as possible in the following ways:

1. Application of policies and standards

Managers and professionals at all levels must understand that policies and standards exist and are to be used. It is incumbent on all members of the Washington and field directorate to be constantly aware of and to affirm the necessity of specialized policies and standards and for consulting and applying them in all studies, projects, programs, and decisions affecting historic resources.

The Associate Director, Professional Services, through the Assistant Director, Park Historic Preservation, should undertake a vigorous and sustained program of publicizing and explaining policies and standards. The latter should meet periodically with each Regional Director and his top management and professional staff as well as the management and professional staff of the Denver Service Center and the archeological centers. He should participate in regional superintendents' meetings and other appropriate gatherings of this character. He should lead a half-day or more discussion on historic resources preservation with each intake training group and other training groups as appropriate. He should maintain a strong and constant functional relationship with his professional counterparts in the regions and DSC.

Regional Directors should charge their professional personnel in historic preservation to undertake the same kind of effort in the parks, natural and recreational as well as historical. In particular, every effort should be made to program and complete Historic Resource Management Plans and Historic Structure Preservation Guides. Such documents are fundamental to proper maintenance of historic resources.

The Associate Directors for Park System Management, Administration, and Professional Services will be responsible for devising safeguards to insure that projects not in accord with policies and standards are not included in approved master plans or development programs.

The Associate Directors for Park System Management and Professional Services will identify measures to insure the meaningful participation of historic preservation personnel in the operations evaluation system.

2. Use of professional personnel

Management at all levels should seek and give appropriate weight to professional advice in all decisions affecting historic resources. In providing such advice, professionals should understand that management decisions must take account not only of purely professional advice but of other considerations as well and, once made, should be faithfully carried out by all concerned.

The Associate Directors for Park System Management and Professional Services will examine the master planning process and institute such modifications as are necessary to insure (1) professional participation from the earliest stages in order that, consistent with NEPA, all historic resources are identified and evaluated and preservation recommendations incorporated into the plans; (2) professional review of all plans; and (3) management consideration of professional comment before final approval.

Regional Directors will proceed as quickly as possible to obtain a Regional Historian, Regional Historical Architect, and Regional Archeologist on the staff of the Associate Regional Director for Professional Support. The organizational identity and independence of thought of this staff should be maintained and it should be consulted regularly in the decision-making process.

The Associate Directors for Park System Management and Professional Services will review the organization and reporting relationship of the archeological centers in light of the experience of the past year and the recent reorganization, particularly the creation of new regions, and recommend any changes that appear desirable.

As part of the present review of the personnel and manpower development system of the National Park Service, the Associate Director for Administration, in consultation with the Associate Directors for Park System Management and Professional Services, will give particular attention to restoring professional identification at the park level (i.e. park historian, park archeologist, park naturalist, etc.) and to career ladders in the professional disciplines from the entrance level through grade GS-15.

3. Scarcity of trained personnel

Trained personnel in all the disciplines and skills of historic preservation are in scant supply. The shortage is most acute in historical architects and craftsmen. In addition, park maintenance personnel charged with routine preservation of historic resources usually lack the specialized training for this function. Since universities are not supplying our need, we must supply it ourselves.

A comprehensive inhouse training program should be devised. Courses of varying duration and specialization at the Training Centers should be important features of such a program, but its primary focus should be on-the-job training in which apprentice personnel work with experienced professionals or craftsmen on specific projects.

The Associate Directors for Park System Management, Administration, and Professional Services will name a task force to study this problem and make recommendations. The task force should include representatives from the personnel, training, maintenance, and historic preservation components of the Service and should address itself, among other matters, to the following items:

Means of strengthening university course offerings in relevant disciplines and skills.

Means of encouraging and assisting Service professionals to obtain advanced university work.

Course offerings at the Training Centers not only for professionals but also park managers and park maintenance personnel.

Establishment of an identifiable corps of restoration specialists at the artisan level, with a career ladder and continuity of employment, to serve the needs of both restoration and maintenance.

Rotating internships to give promising professionals experience in Region, DSC, WASO, and parks where large-scale projects are underway.

The team will examine and evaluate the experience of the Canadian National Historic Site Service in a recently instituted inhouse training program for historic preservation specialists.

4. Inapplicability of standard contract procedures to specialized requirements of historic preservation.

The National Gallery of Art does not send a painting for cleaning to the lowest bidder. Neither should the National Park Service, in treating an irreplaceable historic structure, be bound by procedures designed primarily for modern construction. Two modifications are essential--pre-qualification of bidders and the negotiated contract. The Associate Directors for Park System Management, Administration, and Professional Services will identify and eliminate the obstacles to such measures.

5. Misplaced funding priorities

Inadequate funding is common to all our programs, not just historic preservation. Too frequently, however, within available funding, the treatment of fragile and deteriorating original fabric commands lower priority than less pressing needs, such as reconstruction of vanished historic structures, creation of "typical" buildings reflective of past ways of life, or even the upkeep of roads, trails, and other renewable facilities.

Attitudes of both managers and planners must be shaped to a continuing awareness and application of the fundamental statutory charge to the National Park Service in its organic act, which is that the first responsibility of the Service is to preserve. Without preservation, certainly there can be no use, either by this or later generations. The urge to give high visibility luxuries priority over resource preservation can only be overcome by a vigorous and sustained insistence by management, reinforced by careful scrutiny of plans and programs, on an ordering of priorities that furthers this basic preservation mission first.

This is a state of mind that we must all cultivate in ourselves and foster in our associates and subordinates. It is fundamental to my basic policy of "stabilization" of the National Park Service and System after the great gains of the past decade. Please let me have your wholehearted support in carrying out this policy.



United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:

APR 18 1974

Memorandum

To: Regional Directors and Managers, Denver Service Center and Harpers Ferry Center

From: Associate Director, Professional Services

Subject: Procedures of the Advisory Council on Historic Preservation

In the Federal Register of January 25, 1974, the Advisory Council published revised "Procedures for the Protection of Historic and Cultural Properties." They were reprinted in the 1974 edition of the National Register of Historic Places, published in the Federal Register of February 19, 1974. This memorandum suggests guidelines for their application by the National Park Service.

In the National Historic Preservation Act of 1966 (80 Stat. 915) the Congress declared a national policy of historic preservation and directed the Federal Government to provide leadership. The Act directs the expansion of the National Register of Historic Places to include properties of state and local as well as national significance, established the Advisory Council on Historic Preservation, and required that any Federal agency initiating an undertaking that may affect a National Register property allow the Council a reasonable opportunity to comment.

Executive Order 11593, "Protection and Enhancement of the Cultural Environment," May 13, 1971, seeks to fulfill the purposes of the National Environmental Policy Act (83 Stat. 852) by specifying Federal protection of the cultural environment, including adherence to existing historic preservation legislation. The Order enlarges the role of the Advisory Council in Federal decision making by requiring that it be provided an opportunity to comment on undertakings affecting properties eligible for nomination to the National Register as well as those already listed in the National Register.

Essentially, the new procedures afford a consultative alternative to hearings on a Federal undertaking before the full Council,



provided the Agency, the State Historic Preservation Officer (SHPO), and the Council staff agree that (a) effects on a National Register property will not be adverse; or (b) there is no prudent alternative to an undertaking that will occasion adverse effects but that adversity will be acceptably mitigated. Resolution of these issues is expressed in a memorandum of agreement signed by the parties concerned. Failure to agree on the issues ordinarily causes the Council itself to comment on the undertaking. This involves a presentation of the proposal by the undertaking Agency before the full Council, during which the criticisms of the SHPO and Council staff, and other concerned individuals, are aired. The undertaking may not proceed until after the Council has issued its comments. Such a process can be time-consuming and embarrassing for the undertaking Agency. It is often caused by a failure to give adequate consideration to the effects of an undertaking on cultural resources when alternative or mitigating measures are possible or the property involved is of such significance that the necessity for its preservation calls into question the necessity for the undertaking.

The Director of the National Park Service heads the principal historic preservation agency in the Federal government. He administers many historic properties of national significance as well as many more of less than national significance. The legislation that governs the mission of his bureau requires him to preserve, above all else, the natural and cultural resources of the National Park System. He is by law the Executive Director of the Council. These facts make it incumbent upon the Service to adhere scrupulously to the statutory and regulatory procedures for the protection of historic resources, and to ensure that the Director not be forced to defend before a full meeting of the Council a proposal developed in apparent disregard of its effects on historic resources.

Finally, it should be noted that the attached material deals only with those specific circumstances in which the Congress and the President have directed us to consult the Advisory Council. Satisfactory adherence to the procedures of the Council represents only part of the Service's obligation for the preservation of historic resources. Further, even the procedural requirements of the Service are more demanding than those of the Council. An example is the procedural requirement governing the demolition of historic structures set forth in the Director's memorandum of January 26, 1973. Broader

guidance in historic preservation may be found in Administrative Policies for Historical Areas of the National Park System and in the Activity Standards for Historic Resource Studies and Management.

Ernest Allen Connally

Ernest Allen Connally

Enclosure

GUIDELINES FOR APPLICATION OF THE
PROCEDURES OF THE ADVISORY COUNCIL
ON HISTORIC PRESERVATION UNDER
SECTION 106 AND EXECUTIVE ORDER 11593

Authorities

For purposes of the Advisory Council's procedures, the Regional Director is the responsible "agency official" for the National Park Service. He insures adherence to policies and legal procedures in the conduct of Service activities under his jurisdiction. While staff work and consultations may be carried out by the regional staff, park superintendents, or the Denver Service Center, such personnel act only as agents of the Regional Director, who must be kept informed of and agree with matters treated in the consultations. Only the Regional Director may sign memoranda of agreement with the SHPO and the Council. The Regional Director's responsibilities and role under Section 106 and pertinent provisions of E. O. 11593 may not be redelegated.

Applicability of Section 106 and of Sections 1(3) and 2(b) of E. O. 11593

These requirements prevail in every planning context, from the preparation of a master plan to the smallest construction project. At the earliest possible stages of planning it must be determined and documented whether any properties listed or eligible for listing in the National Register will be affected by an undertaking. Only if the finding is negative, as documented by appropriate professional investigation, are there no further procedural steps (except as outlined in the discussion of a finding of no effect, below).

Identification of properties listed in the National Register

All units of the historical area category of the National Park System are listed in the National Register. Numerous properties in natural and recreational areas are also listed in the National Register when nominated pursuant to Section 2(a) of Executive Order 11593. At the earliest stages of planning, the National Register (as printed in the most recent compilations in the Federal Register) as well as park and regional records (or the Resources Basic Inventory) should be consulted to determine whether any National Register properties exist within the area affected by a proposal.

Identification of properties eligible for nomination to the National Register

Historic resources in areas affected by a proposal need also to be identified if they may qualify for nomination to the National Register. If a park has a Historic Resource Study (see Activity Standards) that incorporates the results of historical, archeological, and architectural surveys of the park and its history, it should provide a listing of historic resources. Specific survey reports, such as those arising from archeological surveys, should also identify historic resources. In the absence of such sources of information, direct examination of the area affected by a proposal by historians, architects, and archeologists may be necessary to locate, identify, and evaluate all existing sites, structures, districts, and objects significant in history, prehistory, archeology, architecture, and culture. Such examination should be conducted in a draft appropriate to the extent that such resources as may exist could be affected by the proposed undertaking. Whatever the source of data, all such resources are to be professionally measured against the criteria for nomination to the National Register. Those that appear to qualify must be specifically considered during planning.

Determination of eligibility for the National Register

All properties that may qualify for the National Register should be recorded, with any information required for the List of Classified Structures, on National Register inventory/nomination forms. In an ordinary case a property should be nominated routinely. But where a speedy determination of eligibility is required the form should be forwarded to the Assistant Director, Park Historic Preservation, with a memorandum describing the problem and requesting a determination of National Register eligibility under Section 2(b) of E. O. 11593. If the finding is affirmative, the Regional Director will be notified and steps will be taken to assure the listing of the property in the National Register.

A proposal that may result in the transfer, sale, demolition, or substantial alteration (adverse effect) of a property determined to be eligible for nomination must be submitted to the Advisory Council for comment, as outlined below.

Non-Federal properties

The field offices of the Service seldom conduct activities that affect non-Federal properties. But in such a case, the Council's procedures under Section 1(3) of E. O. 11593 recommend that the same steps be followed as would apply for Federal properties under Section 2(b).

Determination of Effect

When it is determined that a property listed or eligible for listing in the National Register is likely to be affected by a proposed undertaking the Council's "Criteria for Effect" should be applied. It is important to note that the question of whether an effect is beneficial or adverse is not at this point decisive under Council procedures. Given an effect, the procedures must be followed. Resolution of questions of beneficence or adversity occurs during consultation with the SHPO and the Council staff (although they must be guiding considerations for planners). Determining the occurrence of effect is ordinarily a simple matter; in cases of doubt a proposal should be submitted to the SHPO and Council. Even though nominations to the National Register may emphasize some particular attributes of a property such as architectural merit or association with a past event or culture, the totality of a property's significance, integrity, and appearance are considered during registration. Accordingly, any change in a property or in its environment will cause an effect on the property.

Finding of no effect

A finding that a proposal will have no effect upon a listed or potential National Register property in the area generally affected by the proposal must be documented and must be the result of professional determination. Should such a finding ensue, the Regional Director should seek the concurrence of the SHPO under the Council procedures. Should the SHPO agree, the undertaking may proceed without further consultation. Findings of no effect must be the result of application of the "Criteria for Effect" with a professionally supported negative finding.

Finding of no adverse effect

When it is determined that an undertaking will affect a property listed or eligible for listing in the National Register, but that the effect will not be adverse, the Regional Director should obtain the views of

the SHPO. If the SHPO agrees, or if he disagrees but the Regional Director still believes that the effect will not be adverse, he should provide a documented determination of no adverse effect, together with a copy of the views of the SHPO, to the Executive Director of the Council. Unless the Council objects to the Regional Director's findings within 45 days, the undertaking may proceed without further consultation.

Finding of adverse effect

Should it be determined that there will be an adverse effect on a property listed or eligible for listing in the National Register, the Regional Director should initiate consultation with the SHPO and the Council in accordance with the instructions set forth in the Council procedures.

Primacy of Service policies

In all matters related to historic preservation, the Administrative Policies for Historical Areas and occasional policy memoranda from the Director or his staff govern the actions of the Service. Particularly when a proposal necessitates consultation with the SHPO and the Council, it should be demonstrated that the established policies and procedures of the Service have been observed in the development of the proposal. There are no conflicts between Service policies and the Council procedures. Where dispute arises during consultation with the Council, the fault often lies in internal failure to adhere to policy.

Demolition of structures

Service procedures governing the proposed demolition of structures are set forth in the Director's memorandum of January 26, 1973. Any request to demolish a structure, regardless of age, must be preceded by a professional examination of its historical, architectural, and archeological significance against the criteria for nomination to the National Register. Any proposal to demolish a structure that may qualify for nomination is an action requiring consultation with the SHPO and the Council under Section 2(b) of E. O. 11593. It is Service policy to preserve all historic resources qualifying for the National Register. But if overriding considerations necessitate the removal of a qualifying structure, after compliance with Section 2(b) Regional Directors should be alert to the requirements of Section 2(c) of E. O. 11593 before demolition proceeds. Consultation with the

Council in reference to the demolition of any structure should not be initiated until permission for the demolition has been obtained in conformance with the procedures set forth in the Director's January 26 memorandum.

Packaging of compliance

It is advisable that related actions requiring compliance with Section 106, Section 2(b), or Section 1(3) be grouped together to the extent possible. For instance, Regional Directors should endeavor to obtain, as soon as possible, the concurrence of the Council and the appropriate SHPOs in a memorandum of agreement covering an entire regional ruins stabilization program (or historic structures maintenance program, etc.) over a period of years rather than seek individual consultations for dozens of particular stabilization projects. The Assistant Director, Park Historic Preservation, will upon request advise Regional Directors informally in the initiation of such "programmatic" Section 106 consultations with a view to eliminating the need for repetitive and burdensome reviews to the extent possible.

In individual parks it is advisable to obtain the most inclusive possible compliance with Section 106 and Section 2(b) during master planning. In some parks it may be possible to package all future Section 106 actions into one consultation on a master plan. In others consultation on the master plan may identify specific aspects of the plan that will require renewed Section 106 consultations when more detailed proposals are developed and affected resources are more completely identified. A necessary part of this approach is the incorporation into park operations of a continuing program to inventory and nominate to the National Register all historic resources in the park, and to ensure the full consideration of such resources during individual project planning.

When to initiate consultation

While the effects of a proposal on historic (and natural) resources must be considered from the earliest stages of planning--and indeed must be a governing factor in planning that is consistent with the requirements of NEPA--it is not possible to initiate consultations under Section 106 or Section 2(b) until basic management decisions have been made on the general scope of a proposal, or at least alternative proposals during the formulation of an environmental assessment. On the other hand, consultation should not be delayed until the

proposal is in final form, unalterable by agreements arising during consultation. It should never be delayed until the consultations would cause delay in initiation of the undertaking. While different plans and proposals must be handled on an individual basis, it is important that consultations with the SHPO be initiated soon after basic alternative proposals have been outlined, and the completion of the memorandum of agreement should parallel the final definition of a proposal. In other words, the considerations required by Section 106 and by E. O. 11593 should be applied as integral elements of the planning and decision making processes. The procedural details represented by consultations and memoranda of agreement should then fall easily into place.



United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:

APR 28 1975

Memorandum

To:

~~Director~~ *OFF 5/12*

From:

Assistant Director, Park Historic Preservation

Subject: Historic preservation meeting

The first of what participants hoped would be annual meetings of historic preservation specialists occurred in Boston on April 21-23. More than seventy people participated. Included, in addition to historians, architects, archeologists, and other specialists, were representatives of management on all levels. This participation helped bring about much more meaningful discussion than would have been possible had we simply been talking to ourselves. All participants were especially grateful for the contributions of Russ Dickenson and Dave Thompson.

A dozen or more major topics were addressed. Not surprisingly, there was considerable disagreement on many issues, sometimes warmly expressed. Throughout, however, ran several major strands of consensus which the group approved and asked to be communicated to you and hopefully to the regional directors at an early meeting.

First is the matter of the commitment of the National Park Service to its historic preservation mission. However erroneous may be the opinion, it is undeniable that a substantial part of the Service's historic preservation community doubts the depth and sincerity of our agency's commitment to historic preservation--an opinion, incidentally, not held alone by historic preservation specialists but by others in the Service as well. Recent statements and actions by you and the top Washington staff and by the regional directors have been immensely reassuring. Even so, such institutional biases are not easily or quickly overcome. The conference participants strongly urged that top management seize every opportunity to emphasize the Service's statutory mandates in historic preservation both to the public and, even more importantly, to the Service itself.



The greatest concern was voiced for the immediate danger to the historic fabric entrusted to the care of the National Park Service-- buildings, structures of all kinds, historic and prehistoric ruins, and historic objects. The full dimensions of the need will not be known until the List of Classified Structures is completed. Enough is known to reveal that we are confronted by an emergency of System-wide proportions. Remedies are short-term and long-term. In both the focus is on the parks and the regional offices.

The immediate, short-term need is for interdisciplinary teams of preservation specialists based in the regional offices to render immediate, emergency service to parks with endangered historic fabric. Every region contains enough emergency needs of this character to occupy such teams for the short-term future. Their purpose is not to engage in lengthy studies or complicated bureaucratic procedures, but simply, through application of specialized skills, to keep the fabric from disintegrating.

A bridge between the short-term and long-term need is the List of Classified Structures. It will give us the budgetary and programatic data needed to sustain a major emphasis in historic preservation. The group warmly welcomed your conclusion that the List of Classified Structures should be completed next year, ~~if at all possible~~.

Long-term needs are more complicated and less susceptible to specific solutions. A basic need, however, is to build on the emergency cadres described above to create a permanent regional professional services capability to bring all historic fabric up to standard--i.e. to maintenance condition--and to develop a park capability to meet cyclical maintenance needs. The first function requires preservation specialists in various disciplines. The second requires formal and on-the-job training programs aimed at providing park maintenance personnel with sensitivity to the special conditions and requirements of historic fabric, with the skills to perform tasks within their competence, and with the discrimination to recognize when the help of regional specialists must be sought.

Other problems that will have to be resolved over the long term were discussed and debated without developing clear solutions. Among them may be mentioned the following:

Personnel identifying themselves as "managers" and "professionals" must find ways of developing greater harmony of interest, a greater sense of common purpose, and a greater spirit of cooperation.

There is confusion at all levels over the respective roles and functions of the Washington and regional offices, Denver Service Center, and the parks. Similar confusion exists over roles and functions within offices, especially Professional Services and Park System Management at the regional level. There was a strong feeling that roles and functions must be more clearly communicated and perhaps in some instances redefined.

A feeling was also expressed that some of our current activity standards may not be realistic in their demands or responsive to the need. Some even felt that activity standards were not the best approach to accomplishing our mission. Even so, we think it would be misdirected effort to try at this point to revise the standards. They are sufficient to establish in general the direction we should be going. The need instead is to connect trained, informed specialists with the deteriorating fabric and let them do their thing.

A great deal of discussion focused on the Denver Service Center. Opinion was badly divided on whether the regions or a service center should perform the functions now assigned to DSC. Thus this discussion reflected the broader debates now occurring within the Service. There was consensus, however, that the preservation team in DSC has been hampered by a management climate incongenial to historic preservation interests and by a continuing failure to involve the historic preservation function fully and meaningfully in the other DSC functions. There was also recognition that contract administration and contract supervision as currently conducted by DSC are not adequate to the needs of historic preservation.

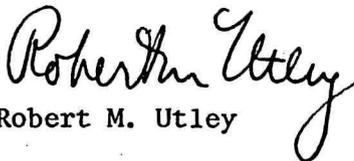
Throughout our discussion of Historic Structure Reports, Historic Resource Management Plans, compliance documents, and master planning ran a recurring theme that our decision-making system is loose, badly defined, and inadequate to the needs of NEPA and 106 compliance. There seems to be a no well-understood document in which one may find a record that describes and justifies a decision. A parallel theme was that, inadequate through documentation may be for some planning needs, for others we are producing excessive documentation. This is wasteful in dollars, manpower, and time. However these long-range concerns may ultimately be resolved, there was a conviction that the emergency needs of the moment dictate that we act with the minimum possible documentation, trusting that qualified specialists will do the right thing and that the ideal documentation can be developed later, perhaps in the form of completion reports. It was emphasized repeatedly, however, that the validity and desirability of the long-term ideal not be clouded by the short cuts decreed by the present emergency.

Another basic need is to recruit and train preservation specialists and to keep them once we have them. In recruiting such people, we are inhibited by governmentwide personnel regulations that must be tortured to accommodate our particular requirements. Even so, it was felt that the existing system can be made to meet our needs if there is a will to do so.

To keep people once we have them, we must provide continuity of employment. This in turn depends upon placing them in permanent, full-time positions and upon modifying or wholly breaking away from a system that ties them to individually funded projects rather than a continuing need. This observation applies not alone to DSC but to all offices with preservation responsibilities.

Finally, it is to be emphasized that the vast collections of historic objects in the custody of the National Park Service are man-made historic fabric in the same sense as structures, ruins, and buildings. Objects are seriously endangered now as are structures. Many of the same techniques and skills needed for structure preservation are common to object preservation. Long-range measures to meet our preservation responsibilities should apply to all man-made fabric, whether fixed or portable, and should reflect the similarities in inherent character as well as in specialized technical preservation methods.

A complete report of the proceedings of this conference will be prepared and distributed. The group, however, wanted the above thoughts transmitted to you at once for such use as you care to make of them at the forthcoming regional director's meeting. This memorandum was prepared, revised, and adopted by the group on the third day of the conference.


Robert M. Utley

MAY 8, 1975

H30-PP

Memorandum

To: Regional Directors and Director, National Capital Parks
From: Assistant Director, Park Historic Preservation
Subject: Non-Class VI land in historical parks

As you know, Class VI lands (now called "historic zones") are evaluated according to National Register criteria. Thus lands managed according to our historic resources policies are also listed in the National Register and subject to the requirements of Section 106 of the National Historic Preservation Act and Executive Order 11593.

Upon enactment of the National Historic Preservation Act, all parks of the historical area category were automatically regarded as listed in the National Register. Few of these parks have been described on National Register forms, however, because we have been giving priority to historic resources in natural and recreational areas. Ultimately all the historical areas will have to be written up on National Register forms.

Most historical areas are all or almost all "historic zone" lands. Thus any undertaking may be regarded as subject to Section 106. There are a few historical areas, however, such as Cumberland Gap, Mesa Verde, and Colonial that contain substantial tracts of non-Class VI land in which Section 106 need not apply unless the undertaking actually impacts the Class VI land.

At present the historical parks are simply listed by name in the National Register as published in the Federal Register. There is no documentation in the National Register files to describe which portions are actually registered, and thus to indicate which projects are not subject to Section 106. A recent case at one such park dramatizes our vulnerability to legal challenges because of this deficiency. Accordingly, it is important that we proceed as a matter of high priority to complete National Register forms for those historical parks containing sufficient non-Class VI land to raise any doubt about the applicability of Section 106. The boundaries of the Class VI land, of course, should be delineated with sufficient precision and clarity to be used as evidence in legal proceedings.

Robert M. Utley

Robert M. Utley

cc: Manager, DSC

bcc: Director's Reading File
P, DG, PH, PD, PC, PA

FNP:RMUtley:mrm 5/8/75

NOV 8 1976

H34-560

Memorandum

To: Regional Directors and Manager, Denver Service Center

From: ~~Acting~~ Director

Subject: National Register Documentation of Historic Resources of
the National Park System

This memorandum is intended to clarify several questions that continue to be raised about nominations to the National Register of Historic Places.

Historical Area Category

We are not evaluating and nominating historical parks to the National Register. In authorizing such parks, the Congress evaluates and declares them nationally significant, and they are automatically, upon establishment, listed in the Register. We are, however, documenting these parks in the Register in order that it will contain data legally sufficient for the Section 106 compliance process--an identification and description of cultural resources that would be affected by a Federal undertaking. Thus Register forms must be prepared for all historical parks even though they are already listed in the Register.

The National Register forms should document those portions of historical parks that meet the Register criteria (notwithstanding current use) and are thus designated historic zones (see Management Policies, II-4). Some few parks such as Colonial may have extensive tracts of land acquired for purposes other than "the protection and public appreciation of cultural resources and their settings," but in most cases historic zone land and the boundaries of the park will not differ. (For further guidance, see memorandum of May 8, 1975 [H30-PP] on non-Class VI land in historical parks.)

As a general rule, all the resources of a historical park should be described on a single nomination form. In addition, however, a small number of special resources will merit separate forms. These are resources whose significance is unrelated to the purpose for which

the park was established or whose significance, though related, includes notable unrelated elements. Examples of the former are the Wayside at Minuteman (the home of important 19th-century literary figures in a Revolutionary War park), the Narbonne House at Salem (17th-century architectural landmark in a 18th- and 19th-century maritime park), and the prehistoric Indian mounds at Shiloh. An example of the latter is the Nelson House at Yorktown, which figured in the battle but is of greater significance for its architectural distinction and as the home of a signer of the Declaration of Independence.

Levels of Significance

Our Management Policies call for evaluating historic resources as of first, second, and third order of significance. These levels coincide with the National Register levels of national, State, and local significance. Levels of significance are discussed in the Policy handbook on pp. V3-V4.

For individual historic properties that are contained within historical parks and that are related to the primary purpose of the park, the question of significance is largely academic. We make informal assessments, such as in the LCS, to determine relative importance for funding purposes and level of treatment. But we do not need to categorize them with a formal level of significance. Their primary importance lies in their support of, or relationship to, the central historical significance of the park. As stated in the Policies, these resources are "clearly integral to the national significance of historical areas," and so do not require any other official label.

For properties in natural and recreational areas, and for properties in historical areas that merit separate nomination as described above, sound evaluations are more important. This is especially so if the property is deemed of national significance (first order). Although it has not been done before, a resource whose primary significance is not related to its park's purpose can be designated a National Historic Landmark. Doing so provides the resource with the greater recognition and visibility that are accorded nationally significant properties across the Nation. It is a step toward consistency that is possible as we more systematically identify and evaluate the historic resources in our own parks. The Service itself does not make this designation. It results from an established process involving the Advisory Board on National Parks, Historic Sites,

Buildings, and Monuments and the Secretary himself. Only the Secretary may designate a National Historic Landmark. Even so, the National Register process allows us to identify properties that merit consideration for Landmark status. On the back page of the Register nomination form, there is space for the writer to indicate his judgment of the property's significance. If, after evaluating the property in light of the criteria of national significance (I-5-7 of the Management Policies), you believe a property is of national significance, mark it that way. The Statement of Significance should then clearly support the judgment of that level of significance. If the evaluation appears well documented, we shall take steps to submit it for consideration by the Secretary's Advisory Board.

Egd. William J. Briggie

bcc:

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560:RMUtley/MSherfy:mjg 11/4/76

BASIC FILE RETAINED IN 560



United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:

October 31, 1978

A5623 (560)

Memorandum

Annual Review

SPECIAL DIRECTIVE 77-9 (REVISED)

To: Directorate and Field Directorate

From: Acting Director

Subject: National Historic Landmarks in the National Park System

Special Directive 77-9, dated October 26, 1977, subject as above, is superseded and replaced by this revision. All copies of that Directive should be removed from the files and destroyed.

Two means exist for granting public recognition to historic properties of national significance: their establishment as national historic sites or units of the National Park System having historical significance, or their designation as national historic landmarks. The designation of landmarks has heretofore been limited to properties outside the System. As a result, nationally significant historic properties within the System whose park designations are neither indicative of their particular historical significance or contributory to the primary themes of such areas possessing historical significance (when they fall within such themes) have been denied placement in either of the categories for identifying national historical significance to the public.

Nationally significant historic properties in the System but not in parks created for their historical significance and such properties in parks of historical importance whose national significance is unrelated to their parks' primary themes are now eligible for landmark designation. These properties fall into three classes and will be dealt with in ways appropriate to each.

1. Previously designated landmarks

This category includes two landmarks that lost their identity as such when they were included in additions to the National Park System: Bailly Homestead, in Indiana Dunes National Lakeshore, and Fort San Carlos de Barrancas, in Gulf Islands National Seashore. It also includes the seven components of Boston National Historical Park, which, although supporting that park's theme, are each so distinct and important as to warrant individual identification as landmarks. Landmark designation is hereby returned to all properties in this category. The responsible regional offices will submit National Register forms documenting the national significance of any not now represented by such forms.

2. Properties previously found nationally significant but not designated landmarks

This category includes properties judged by the Secretary's Advisory Board as nationally significant either prior to the inauguration of the landmark program or later when landmark designation was withheld from properties in the System. Among them are the following:

Cape Hatteras Lighthouse (Cape Hatteras NS)
 The Nelson House (Colonial NHP)
 The Floyd House (Fire Island NS)
 The First Bank of the United States (Independence NHP)
 The Second Bank of the United States (Independence NHP)
 The Philadelphia Exchange (Independence NHP)
 The Wayside (Minute Man NHP)
 Ellis Island (Statue of Liberty NM)

These properties, documented on National Register forms, will be submitted to the Secretary for landmark designation of those confirmed as possessing national significance. The responsible regional offices will prepare and submit the necessary forms.

3. Properties believed to possess national significance

This category includes properties believed to be nationally significant but not previously evaluated by the Secretary's Advisory Board. As field offices continue their identification, evaluation, and National Register nomination of park historic resources in compliance with Executive Order 11593, they may judge some properties to possess national significance in light of the relevant criteria (Management Policies, I:5-7). In such cases, the back page of the Register nomination form should be checked accordingly. Properties recommended as nationally significant will be given special review in the Washington Office and will be submitted to the Secretary for landmark designation when warranted. (Reference: Memorandum of November 8, 1976, from Acting Director Briggles, "National Register Documentation of Historic Resources of the National Park System.")

As at the Boston Naval Shipyard and Skagway, Alaska, a unit of the National Park System may not encompass all of a national historic landmark. In such cases, the identity of the landmark will be maintained.



A7219(560)

OCT 26 1977

Memorandum

Annually
Review Date

SPECIAL DIRECTIVE

77-9

To: WASO and Field Directorate

From: Director

Subject: National Historic Landmarks in the National Park System

Two means exist for granting public recognition to historic properties of national significance: their establishment as national historic sites or other historical units of the National Park System, or their designation as national historic landmarks. The designation of landmarks has heretofore been limited to properties outside the System. As a result, nationally significant historic properties within the System that are neither historical parks nor contributors to the primary themes of historical parks (when they fall in such) have been denied placement in either of the categories for identifying national historical significance to the public.

Nationally significant historic properties in the System but not in historical parks and such properties in historical parks whose national significance is unrelated to their parks' primary themes are now eligible for landmark designation. These properties fall into three classes and will be dealt with in ways appropriate to each.

1. Previously designated landmarks

This category includes two landmarks that lost their identity as such when they were included in recreational additions to the National Park System: Bailly Homestead, in Indiana Dunes National Lakeshore, and Fort San Carlos de Barrancas, in Gulf Islands National Seashore. It also includes the seven components of Boston National Historical Park, which, although supporting that park's theme, are each so distinct and important as to warrant individual identification as landmarks. Landmark designation is hereby returned to all properties in this category. The responsible regional offices will submit National Register forms documenting the national significance of any not now represented by such forms.

2. Properties previously found nationally significant but not designated landmarks

This category includes properties judged by the Secretary's Advisory Board as nationally significant either prior to the inauguration of the landmark program or later when landmark designation was withheld from properties in the System. Among them are the following:

Cape Hatteras Lighthouse (Cape Hatteras NS)
 The Nelson House (Colonial NHP)
 The Floyd House (Fire Island NS)
 The First Bank of the United States (Independence NHP)
 The Second Bank of the United States (Independence NHP)
 The Philadelphia Exchange (Independence NHP)
 The Wayside (Minute Man NHP)
 Ellis Island (Statue of Liberty NM)

These properties, documented on National Register forms, will be submitted to the present Advisory Board for review and to the Secretary for landmark designation of those confirmed as possessing national significance. The responsible regional offices will prepare and submit the necessary forms.

3. Properties believed to possess national significance

This category includes properties believed to be nationally significant but not previously evaluated by the Secretary's Advisory Board. As field offices continue their identification, evaluation, and National Register nomination of park historic resources in compliance with Executive Order 11593, they may judge some properties to possess national significance in light of the relevant criteria (Management Policies, I:5-7). In such cases, the back page of the Register nomination form should be checked accordingly. Properties recommended as nationally significant will be given special review in the Washington Office and will be considered by the Advisory Board and the Secretary for landmark designation when warranted. (Reference: Memorandum of November 8, 1976, from Acting Director Briggie, "National Register Documentation of Historic Resources of the National Park System.")

As at the Boston Naval Shipyard and Skagway, Alaska, a unit of the National Park System may not encompass all of a national historic landmark. In such cases, the identity of the landmark will be maintained.

s/William J. Whalen



United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:

2/8/79

A5627(560)

Memorandum

Annual Review

STAFF DIRECTIVE 78-1 (REVISED)

To: Directorate and Field Directorate
From: Associate Director, Management & Operations
Subject: Memorandum of Understanding with the Advisory Council on
Historic Preservation

Staff Directive 78-1 dated February 14, 1978, subject as above is superseded and replaced by this revision. All copies of that Directive should be removed from the files and destroyed. The Memorandum of Understanding, the procedures for compliance, and the Assessment of Effect form appended to that Staff Directive should be retained and appended to this revised Staff Directive.

In June 1976 the National Park Service negotiated a Memorandum of Understanding with the Advisory Council on Historic Preservation that should expedite our compliance with Section 106 of the National Historic Preservation Act. The Memorandum and the procedures developed for its implementation are intended to shift the bulk of Council review and comment under Section 106 from the individual project stage to the general planning stage. Following Council approval of a general management plan, for example, all actions taken in furtherance of the plan and certified by regional preservation professionals as consistent with Service policies and standards may proceed without further consultation.

The North Atlantic, Mid-Atlantic, and Southeast Regions have been selected for a trial run with the new procedures in 1979 before they are put into effect Servicewide. Other regions may be included during 1979. During this trial period, the other regions should ready themselves in two areas:

(1) All current park plans that have not been through the existing Section 106 process should promptly be evaluated for effect and circulated to the appropriate State Historic Preservation Officers and the Advisory Council for review and comment in accordance with the Council's procedures (36 CFR Part 800). When this has been done, a list of the processed plans should be submitted to the Assistant Director, Cultural Resources, WASO, who will identify with the Council staff those that can be considered "approved plans" for purposes of the Memorandum of Understanding.

(2) Section 106 compliance under the new procedures will necessitate each participating region having a Regional Archeologist, a Regional Historian, and a Regional Historical Architect. Regions lacking any of these positions should move to insure that they are established and filled immediately.

Some changes may be expected on the basis of experience gained during the trial period. The Assistant Director, Cultural Resources, has been assigned general responsibility for matters pertaining to the Memorandum and the procedures; questions and comments should be addressed to him.





United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:

March 31, 1978

A5627(560)

Memorandum

Annual

Review

STAFF DIRECTIVE 78-2

To: Directorate and Field Directorate
From: Associate Director, Management and Operations
Subject: Collections and National Register Nominations

This directive provides guidance on the incorporation of historic object collections (including artifacts, furnishings, and historic documents) in nominations of properties to the National Register of Historic Places.

Historic objects, along with sites, structures, and districts, are specified in the National Historic Preservation Act of 1966 as cultural resources to be included in the National Register. In practice, the Register's primary role as a planning tool, its criteria requiring integrity of location and setting, and the practical difficulties of encompassing the enormous volume of potentially eligible objects and collections have led the Register to adopt a restrictive policy toward objects. Individual listing of objects is generally limited to relatively large and fixed features, such as monuments, statues, and ships, that remain in their historic context (as opposed to a museum context).

Frequently in the National Park System, however, objects and collections are directly associated with and contribute to the significance of sites, structures, and districts that do qualify for Register listing. The furnishings at Sagamore Hill, the artifacts excavated at Mesa Verde, the historic documents at Edison, and the architectural fabric removed from Independence Hall are integral components of the Register properties with which they are associated. As such, they and our many other place-related historic object collections may be recognized by the Register. For this to happen, they must be specifically described and evaluated in the Register forms documenting the contributing features of their associated properties.

In describing collections, it is sufficient to broadly define their characteristics (scope, types, range, variation, quality) in a manner similar to what is done in a "Scope of Collections" statement. For

example, in describing a historic house in a Register nomination, a statement about the scope and characteristics of the furnishings collection historically associated with the house should be included. In a similar manner, archeological collections associated with structures, sites, or districts should be included in the descriptive portion of the Register nomination. Site-related historic documentary resources should also be included. The general rule to follow is this: If it is required to be catalogued by the Museum Records Handbook, or if it is in an archeological center catalog or inventory, or if it belongs to the Service, but is on loan to an institution and is historically associated with a unit of the National Park System, then the collection should be included in the appropriate National Register submission. In all cases, for National Register purposes, the collection shall be explicitly defined to include only those items original to or historically associated with the nominated property; other objects, whether period pieces or modern reproductions, acquired for interpretive or comparative study purposes shall be excluded.

Some "do not's" are in order. Do not list the number of items in collections nor the number of collections, nor describe them by accession, nor append inventories, nor state their location. This kind of information is internal to the Service and is neither wanted nor needed on Register forms. Do not list collections that are not under Service control. "Service control" applies to collections in our possession or on documented loan to an institution or agency and subject to recall at the discretion of the Service.

When collections are included in a Register form, the significance statement of the form must assess their value in relation to the site or district and in terms of the Register criteria. At Edison NHS, for example, the object collections and the documentary records are highly important to an understanding of Edison and his work; they possess the intrinsic quality of authenticity; they are a historical research archive; they are a systematic scientific collection of artifacts representative of a specific period of industrial America; and from an anthropological perspective, they have outstanding potential as a study collection. On the other hand, the original Sandburg furnishings left at the Carl Sandburg home derive their significance from their authenticity and their associations with Sandburg, but they probably do not represent a systematic scientific collection.

Collections resulting from archeological studies usually derive their major significance as systematic scientific collections. Within this concept, however, it is important to include the original field notes, negatives, slides, field catalogs, field diaries, and archived remote sensing data. In Register terms, these kinds of collections have yielded and/or are likely to yield information important in history or prehistory. No matter how significant a collection is in its own right, however, the site with which it is associated will remain the subject of Register nomination, with the collection being treated as a feature of that site.

Since we have not paid great attention to the inclusion of objects in the Register before, many completed Register forms may not reflect the collections associated with the properties they describe and evaluate. Park and regional personnel responsible for these forms should review them and submit addendums to cover collections when necessary. For places whose Register forms have not yet been submitted, any associated collections should be included in accordance with the above guidelines.

By December 15, 1978, regional offices should submit reports to the Director, Attention: Chief, Cultural Resources Management Division, on their experience in including collections in National Register nominations. The reports should address unresolved issues and problem areas and contain constructive criticism on these guidelines. They should include the number of old Register submissions for which collection addendums have been prepared and the number of new submissions which have included collections.

Specific questions concerning the content of this Staff Directive may be addressed to the Chief, Cultural Resources Management Division (560), WASO.



MAY 10 1978

AS623(560)

Memorandum

Review

SPECIAL DIRECTIVE 78-3

To: Directorate and Field Directorate

From: Director

Subject: Removal, Major Alteration, or Neglect of Old Structures

This directive supersedes the Director's "Historic Buildings" memorandum of January 26, 1973.

Chapter V of the NPS Management Policies states that proposals for the removal, substantial alteration, or neglect of structures listed or eligible for listing in the National Register of Historic Places shall be advanced only during the planning process, or on the basis of a thorough professional review, and shall be subject to the Section 106 compliance procedures of the Advisory Council on Historic Preservation. In addition, past Directors have required specific approval above the park level for such proposals concerning all older structures, including those not determined to qualify for the National Register. This directive reaffirms the substance of those approval authorities and provides further direction on the treatment of old structures.

No structures or structural remains over 50 years old shall be removed, importantly altered, or consciously left to deteriorate without the approval of the Regional Director and the concurrence of the Associate Director, Management and Operations. Proposals submitted for concurrence shall be forwarded with supporting documentation and justification to the attention of the Chief, Cultural Resources Management Division, Washington Office. Since a question might be raised about the potential eligibility of a structure in this category for the National Register (assuming no previous determination of eligibility), the appropriate State Historic Preservation Officer should be consulted following internal approval and concurrence. If the State Historic Preservation Officer agrees that the property does not meet the National Register criteria and no question is raised by a responsible third party, the proposed action may proceed; otherwise, a determination of eligibility for the National Register shall be sought in accordance with the procedures in 36 CFR Part 63, published in the Federal Register of September 21, 1977. ("Guidelines for Level of Documentation to Accompany Requests for Determinations of Eligibility for Inclusion in the National Register" appear in the same issue of the Federal Register.)

No structure or structural remains under 50 years old shall be removed, importantly altered, or consciously left to deteriorate without the approval of the Regional Director. Following such approval in the case of any structure whose potential eligibility for the National Register might be questioned, external consultation and subsequent action shall proceed as stated above.

In general, old structures should be used to serve park needs whenever feasible. Consistent with national energy goals, consideration should be given to adapting such structures for necessary housing, storage, maintenance, or other administrative functions in preference to new construction.

William J. H. H. H.

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United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:
A5627 (562)

February 25, 1981

STAFF DIRECTIVE 81- 1

Annual Review

To: Directorate and Field Directorate
From: Associate Director, Management and Operations
Subject: Erecting Monuments and Memorial Markers in the Parks

Monuments and memorial markers can add dimension to a unit of the National Park System, attest to its significance, set a mood for the park, and be useful in its interpretation. If selected with care they can provide a timeless statement of great value.

Monuments, however, in all classes of units except national memorials are also intrusions on the historic, cultural or natural landscape and can diminish the integrity of their surroundings. Even the newest and least impressive of them must be considered a historic structure and preserved in perpetuity. Therefore, new monuments or memorial markers will be erected in parks only on the approval of the Director, subject to their being individually authorized by law or by the park's approved general management plan, amendments thereto, and necessary approved action plans.

Monuments considered for approval will be compatible with their sites and environs. They will be enduringly constructed and will be composed only of materials the least susceptible to corrosion. Their legends will be factual and they will not bear the name of their donor except when the donation itself is integral to the historical significance of the park or when the donor is a state or territory having a significant association with the park.

After review and approval by the Park Superintendent and the Regional Director, the selection of the designer will be referred to a panel established by the Director which will provide the Director with its recommendations. The panel will also make recommendations on the final design, placement of the monument and construction materials and methods. Final approval of all monuments will rest with the Director.





United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

FEB 1 1973

IN REPLY REFER TO:

H30-P

Memorandum

To: Director *WJ*

From: Associate Director, Professional Services

Subject: National Trust for Historic Preservation

The National Trust for Historic Preservation is a private nonprofit corporation chartered by Act of Congress in 1949 to further the purposes of the Historic Sites Act of 1935 (which is administered by the National Park Service) and to facilitate public participation in historic preservation activities. It now has a membership of more than 34,000 individuals and about 1200 local organizations concerned with historic preservation. It is the national focus for the broad private effort in preservation.

The Trust is authorized to receive donations of property and maintains twelve historic buildings of national importance. It conducts educational and technical assistance programs of great value.

The Trust is supported by membership dues, gifts, and financial assistance under our grants-in-aid program. (The Trust is specifically included for financial assistance in the National Historic Preservation Act of 1966, which is our authority for the grants program.) Our grants now account for about 40 percent of the Trust's annual budget. The apportionment to the Trust for the current fiscal year is \$1.3 million. A total of \$4 million has been apportioned to the Trust under the grants-in-aid program.

Board of Trustees

The board now consists of about thirty members of the Trust elected at the annual meeting, usually for terms of five years on a staggered schedule. The board elects its own officers, and Gordon Gray, formerly Secretary of the Army, has been Chairman for many years. James Biddle is President of the Trust. He and other officers meet with the board.

Under provisions of the statute of 1949 there are also three ex-officio members of the board: the Attorney General of the United States, the

Director of the National Gallery of Art, and the Secretary of the Interior. Each of these is represented by a designee. The Director of the National Park Service is designee of the Secretary of the Interior. The designees are eligible for election as officers of the board and for appointment to committees.

It has been recognized by the Chairman of the Board and the President of the Trust that the demands on the time of the Director of the National Park Service are much heavier than those of the other designees. Accordingly they have welcomed me as a substitute for the Director when he has been unable to attend (which has been frequent) and have recently indicated they are happy to continue the arrangement. I suggest that it would ease your burden to continue the arrangement, which has proven quite satisfactory. Of course I shall be pleased to represent you and keep the file for you. If you approve please indicate:

Yes 

No

The Board or the Executive Committee usually meets the second Tuesday in each month, except July and August and the month of the annual meeting, when a different date is set. The meetings typically occupy a full morning and have become rather crowded. The next meeting of the Board of Trustees will be held Tuesday, May 8, in the Board Room at 740 Jackson Place, N.W., Washington. Since you will want to attend a board meeting at some reasonably early time, I suggest that the morning of May 8 be marked on your calendar for possible attendance as circumstances may permit.

The following meeting of the board will be on Thursday, October 11, during the annual meeting, which will be held in Cleveland. There is no reason for you to feel obliged to go to Cleveland unless you want to.

Executive Committee

The Executive Committee consists of the officers and three other members of the board. Its meetings take a full morning also. The next meetings are scheduled for February 13, March 13, April 10, June 12, September 11, November 13, December 11--all in the Board Room on Jackson Place, Washington.

You are not a member of the Executive Committee; however, all trustees are always invited to every meeting of the Executive Committee and thus receive notices of the meetings. A number of trustees usually attend.

I suggest that you will find it impracticable to put these meetings on your calendar. I will represent you whenever it seems desirable for one of us to attend. If this approach is agreeable, please indicate:

Yes *EW*

No

Historic Properties Committee

The ex-officio trustees are expected to serve on one or more committees. Because of his responsibility for administering historic properties, the Director of the National Park Service has usually been appointed to the Historic Properties Committee. George Hartzog served as co-chairman of the committee with Ralph P. Hanes of Winston-Salem, N.C., although it was rarely possible for George to attend the meetings. The new chairman is Walter Beinecke, Jr. of New York. Mr. Beinecke is a business man and philanthropist with an active interest in historic buildings. Frederick Nichols, Professor of Architecture, University of Virginia is vice-chairman. I know Beinecke and Nichols and most of the committee, several of whom are architects.

You have received materials from the committee, which will meet next on February 13. (It meets on call.) I have spoken to Jimmy Biddle about the composition of the committee and he had assumed you would accept appointment to it. This would be your only committee assignment. Since the other ex-officio trustees accept committee assignments, I think you ought to accept. Biddle understands that you would be represented by the usual substitute. I can easily arrange it on that basis if you agree.

Yes *EW*

No

Meanwhile I am holding the materials sent to you.

Dr. Thank you

Ernest Allen Connally
Ernest Allen Connally

RESERVOIR SALVAGE ACT (1960)

Explanation

Reservoir Salvage Act of June 27, 1960

Public Law 86-523
74 Stat. 220

The Reservoir Salvage Act provides for an extension of policy set forth in the Historic Sites Act specifying that historical and archaeological data affected by the construction of a dam "by any agency of the United States, or by any private person or corporation holding a license issued by any such agency" shall be preserved.

Work to be performed under the terms of this Act, because of delegations of authority, has become the primary responsibility of the Division of Archeology. Especially pertinent sections are Sec. 2 (b) and Sec. 3 (1) and (3). Areas of disagreement have resulted in interpretations over funding for the surveys. Congress has, in Sec. 4, provided authorization for funding appropriations, but little agreement has been found as to which agencies are to ask for the funding and if funds can be transferred from one agency to another. Sec. 3 (3) provides for funds to be accepted from private persons or corporations involved in dam construction, but this does not cover either the Corps of Engineers or Bureau of Reclamation.

The Bureau of the Budget letter (1947) preceeded the passage of this Act. However, many persons express the view that this decision also applies to the terms of the Reservoir Salvage Act. Decision E-125309 of the Comptroller General, December 6, 1955, does indicate that at least in emergency situations it is appropriate to use construction funds for salvage archeology. The Corps of Engineer Directive Manual and the provision clause found in recent Bureau of Reclamation appropriations (example herewith) have an influence on the interpretation of others. Needless to say, no final resolution has come to pass.

The Act

Public Law 86-523
86th Congress, S. 1185
June 27, 1960

AN ACT

74 STAT. 220.

To provide for the preservation of historical and archeological data (including relics and specimens) which might otherwise be lost as the result of the construction of a dam.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That it is the purpose of this Act to further the policy set forth in the Act entitled "An Act to provide for the preservation of historic American sites, buildings, objects, and antiquities of national significance, and for other purposes", approved August 21, 1935 (16 U.S.C. 461-467), by specifically providing for the preservation of historical and archeological data (including relics and specimens) which might otherwise be irreparably lost or destroyed as the result of flooding, the building of access roads, the erection of workmen's communities, the relocation of railroads and highways, and other alterations of the terrain caused by the construction of a dam by any agency of the United States, or by any private person or corporation holding a license issued by any such agency.

Historical and archeological data, preservation.

49 Stat. 666.

Sec. 2. (a) Before any agency of the United States shall undertake the construction of a dam, or issue a license to any private individual or corporation for the construction of a dam, it shall give written notice to the Secretary of the Interior setting forth the site of the proposed dam and the approximate area to be flooded and otherwise changed if such construction is undertaken: Provided, That with respect to any floodwater retarding dam which provides less than five thousand acre-feet of detention capacity and with respect to any other type of dam which creates a reservoir of less than forty surface acres the provisions of this section shall apply only when the constructing agency, in its preliminary surveys, finds, or is presented with evidence that historical or archeological materials exist or may be present in the proposed reservoir area.

Dam construction. Advance notice.

(b) Upon receipt of any notice, as provided in subsection (a), the Secretary of the Interior (hereinafter referred to as the "Secretary"), shall cause a survey to be made of the area proposed to be flooded to ascertain whether such area contains historical and archeological data (including relics and specimens) which should be preserved in the public interest. Any such survey shall be conducted as expeditiously

Survey.

as possible. If, as a result of any such survey, the Secretary shall determine (1) that such data exists in such area, (2) that such data has exceptional historical or archeological significance, and should be collected and preserved in the public interest, and (3) that it is feasible to collect and preserve such data, he shall cause the necessary work to be performed in such area to collect and preserve such data. All such work shall be performed as expeditiously as possible.

(c) The Secretary shall keep the instigating agency notified at all times of the progress of any survey made under this Act, or of any work undertaken as a result of such survey, in order that there will be as little disruption or delay as possible in the carrying out of the functions of such agency.

(d) A survey similar to that provided for by section (b) of this section and the work required to be performed as a result thereof shall so far as practicable also be undertaken in connection with any dam the construction of which has been heretofore authorized by any agency of the United States, or by any private person or corporation holding a license issued by any such agency.

(e) The Secretary shall consult with any interested Federal and State agencies, educational and scientific organizations, and private institutions and qualified individuals, with a view to determining the ownership of and the most appropriate repository for any relics and specimens recovered as a result of any work performed as provided for in this section.

74 STAT. 221

Sec. 3. In the administration of this Act, the Secretary may—

(1) enter into contracts or make cooperative agreements with any Federal or State agency, any educational or scientific organization, or any institution, corporation, association, or qualified individual; and Administration.

(2) Procure the temporary or intermittent services of experts or consultants or organizations thereof as provided in section 15 of the Act of August 2, 1946 (5 U.S.C. 55a); and 60 Stat. 810.

(3) accept and utilize funds made available for salvage archeological purposes by any private person or corporations holding a license issued by an agency of the United States for the construction of a dam or other type of water or power control project.

Sec. 4. There are hereby authorized to be appropriated such sums as may be necessary to carry out the purposes of this Act

APPROVED JUNE 27, 1960

Delegation of Authority from Secretary of the Interior

UNITED STATES
DEPARTMENT OF THE INTERIOR
OFFICE OF THE SECRETARY
WASHINGTON 25, D.C.

March 1, 1961

ORDER NO. 2640, Amendment No. 13

Subject: Delegations of Authority, National Park Service

Order No. 2640, dated June 11, 1951 (16 F. R. 5846), is amended as follows:

A new section, numbered 40 and reading as follows, is added thereto:

Sec. 40. The Director is authorized to exercise all of the authority of the Secretary under the act of June 27, 1960 (74 Stat. 220), with respect to the preservation of historical and archeological data (including relics and specimens) which might otherwise be lost as the result of the construction of a dam.

(Sgd) Stewart L. Udall

Secretary of the Interior

C O P Y

The National Register of Historic Places

Historic properties recognized as nationally significant, either by their inclusion in the National Park System or by designation as National Historic Landmarks, are placed on the National Register of Historic Places. Under authority of the National Historic Preservation Act of 1966 (80 Stat. 915) and Executive Order 11593 of May 13, 1971, historic properties of State and local as well as national importance may be nominated to the National Register by the States and territories and by Federal agencies. Non-Federal properties on the National Register may be considered for Federal historic preservation grants-in-aid. Federally assisted or licensed undertakings that may affect National Register properties are subject to review and comment by the Advisory Council on Historic Preservation under Section 106 of the National Historic Preservation Act and Section 2(b) of Executive Order 11593. In administering the National Register program, the National Park Service shall continue to identify properties significant in the American past and to support their preservation through financial assistance and such other means as may be available.

The Historic American Buildings Survey and Historic American Engineering Record

The Historic American Buildings Survey (HABS), organized in 1933 and given legal authority with the Historic Sites Act of 1935 (49 Stat. 666), documents historic structures with architectural measured drawings, professional photographs, and architectural and historical reports. The National Park Service administers the program in cooperation with the American Institute of Architects and the Library of Congress. The Historic American Engineering Record (HAER), begun in 1969 with the American Society of Civil Engineers, is a parallel program for engineering and industrial works. Through these programs of preservation through documentation, the National Park Service shall continue to record significant American structures and to promote awareness of the Nation's architectural and technological heritage.

Interagency Programs in Archeology and Historic Architecture

Under authority of Executive Order 11593 of May 13, 1971, and the Archeological and Historic Preservation Act of 1974 (88 Stat. 174), the National Park Service conducts a variety of activities to assist

Federal agencies in identifying, evaluating, preserving and/or salvaging architectural and archeological resources under their jurisdiction or affected by their programs. Under the Antiquities Act of 1906 (34 Stat. 225), the Service grants permits for archeological and paleontological explorations on most Federal lands and monitors scientific investigations. Through these programs the Service shall work to insure that Federal agencies play an exemplary role in their treatment of cultural resources.

MAR 8 1973

H30-PH

Memorandum

To: Associate Director, Professional Services

From: Director, Office of Archeology and Historic Preservation

Subject: Scope of the National Park System

Key staff members of this office and the historical staff of the Denver Service Center-East have met twice and given careful consideration to each historical area of the National Park System in relation to the criteria of national significance, especially integrity of surviving remains and setting, and to representation by theme as defined in the National Park System Plan. We have also examined the categorization of areas and touched on the historic resources of the natural and recreational areas. The following represents a surprisingly general consensus as well as my own view.

A. NATIONAL HISTORIC SITES IN NONFEDERAL OWNERSHIP

In the first years after enactment of the Historic Sites Act of 1935, the nonfederally owned National Historic Site was conceived as a major preservation device. Under a cooperative agreement with the Secretary of the Interior, owners of such properties undertook certain obligations of preservation, interpretation, and public access. In return, the National Park Service attested to the national significance of the property, furnished a large bronze plaque, technical advice and assistance, listing as a unit of the National Park System, and occasionally funding when specifically provided by the Congress. The National Historic Landmark program, inaugurated in 1960, also recognizes national significance, provides a bronze plaque and certificate, and in theory makes available technical advice and assistance. For all practical purposes, the landmark program has supplanted this National Historic Site program. Moreover, since National Historic Site is a term also used to designate federally owned and operated units of the National Park System, the existence of nonfederally owned National Historic Sites creates confusion and misunderstanding.

Accordingly, we recommend that National Historic Sites in nonfederal ownership be dropped from the list of units of the National Park System and the owners be approached with a proposal to change their status to that of National Historic Landmark. These are:

1. Chicago Portage NHS, Ill.
2. Chimney Rock NHS, Neb.
3. Dorchester Heights NHS, Mass.
4. Gloria Dei (Old Swedes') Church NHS, Pa.
5. Jamestown NHS, Va.
6. McLoughlin House NHS, Oregon
7. Pennsylvania Avenue NHS, D. C.
8. St. Paul's Church NHS, New York
9. St. Thomas NHS, Virgin Islands
10. San Jose Mission NHS, Texas
11. Touro Synagogue NHS, R. I.

Although eliminated as a National Historic Site, Jamestown should still be treated as a nonfederally owned portion of Colonial National Historical Park.

B. NATIONAL CEMETERIES

Virtually all National Cemeteries under National Park Service jurisdiction are integral, significant, and meaningful parts of larger park areas, and there should be no question of their retention. However, it is confusing and inaccurate to list them separately as units of the National Park System. The following are those that are so listed although not all that are in Service custody. They should be deprived of their present separate identity.

1. Antietam National Cemetery, Maryland
2. Fort Donelson National Cemetery, Tenn.
3. Fredericksburg National Cemetery, Va.
4. Gettysburg National Cemetery, Pa.
5. Poplar Grove (Petersburg) National Cemetery, Va.
6. Shiloh National Cemetery, Tenn.
7. Stones River National Cemetery, Tenn.
8. Vicksburg National Cemetery, Miss.
9. Yorktown National Cemetery, Va.

Battleground National Cemetery, D. C. may be retained simply as another National Capital Park reservation or dropped. It is unworthy of serious consideration. Congressional Cemetery, prospectively a unit of National Capital Parks, should be included as a reservation.

C. NATIONAL MEMORIALS

Traditionally the National Park Service has resisted, or at least not warmly encouraged, the addition of memorials to the National Park System. Our official attitude has fairly consistently been that, since any person or event can be memorialized anywhere, criteria are virtually impossible to develop, and therefore the initiative in the creation of national memorials should be exclusively the province of the Congress. Some of our memorials are powerful symbols of our heritage and tangible national treasures of the first importance. Others present so little meaningful association with or evocation of the person or events memorialized as to make them of dubious merit as components of the National Park System. We place the following in this latter category:

1. Arkansas Post National Memorial, Ark.
2. Chamizal National Memorial, Texas
3. Coronado National Memorial, Arizona
4. DeSoto National Memorial, Florida
5. Fort Caroline National Memorial, Florida
6. Fort Clatsop National Memorial, Oregon
7. Johnstown Flood National Memorial, Pa.
8. Lincoln Boyhood National Memorial, Indiana
9. Roger Williams National Memorial, R. I.
10. Thaddeus Kosciuszko National Memorial, Pa.

Four National Memorials possess symbolic and evocative values of such magnitude as to warrant retention:

1. General Grant National Memorial, N. Y.
2. Jefferson National Memorial, D. C.
3. Lincoln National Memorial, D. C.
4. Mount Rushmore National Memorial, S. D.

The following should also be retained for the reasons stated:

1. Jefferson National Expansion Memorial, Mo. The Gateway Arch is an architectural and engineering monument of major significance. Together with the proposed Museum of Westward Expansion and the historic old courthouse, it is of considerable symbolic and interpretive value.

2. Perry's Victory and International Peace Memorial, Ohio. Representation of the War of 1812 is thin, and the existing area is an appropriate commemoration and illustration of the naval battle that occurred on nearby waters.

3. Hamilton Grange National Memorial, New York. This is designated a memorial because the Hamilton house is not on its original site. However, the structure is original and has been restored. It is the only property we have with strong Hamilton associations.

Two areas qualify as National Historic Sites and should be relabeled:

1. Federal Hall National Memorial, New York. This is a historic property of considerable importance. Earlier buildings that occupied the site were the scene of events of transcendent significance--the trial of John Peter Zenger involving freedom of the press, Washington's first inaugural, and the first U. S. Congress. In addition, the present building on the site, a U. S. subtreasury built in 1842, is of notable architectural merit.

2. Wright Brothers National Memorial, N. C. The site and historic setting of the first manned and powered flight is scarcely changed. The designation doubtless came about because of the memorial tower on the hill overlooking the site.

D. AREAS OF DAMAGED INTEGRITY

Some historical areas of the National Park System clearly met the criteria of national significance at one time but now, through encroachment of modern developments or other forces, have suffered such severe loss of integrity as to undermine the quality of national significance. We believe that the most severely damaged of these areas no longer can be justified as federal obligations. These are:

1. Portions of Fredericksburg and Spotsylvania County Battlefields Memorial National Military Park, Va.
2. Portions of Richmond National Battlefield Park, Va.
3. Stones River National Battlefield, Tenn.

E. AREAS LACKING NATIONAL SIGNIFICANCE

Over the years a number of historical areas have been included in the National Park System that did not meet standards of national significance, lacking either in historical importance or integrity. They should not have been added to the System in the first place and should now be dropped wherever possible. These are:

1. Abraham Lincoln Birthplace NHS, Ky.
2. Booker T. Washington NM, Va.
3. Cabrillo NM, California
4. George Washington Carver NM, Mo.
5. Mar-A-Lago NHS, Fla.
6. Pipe Spring NM, Arizona
7. San Juan Island NHP, Washington
8. Saugus Iron Works NHS, Mass.
9. Theodore Roosevelt Birthplace NHS, N. Y.
10. Theodore Roosevelt Inaugural NHS, N. Y.
11. Tupelo National Battlefield, Miss.
12. Tuzigoot National Monument, Arizona

F. SPECIAL CONSIDERATIONS

1. Alibates Flint Quarries and Texas Panhandle Pueblo Culture National Monument, Texas, is contained within the boundaries of Lake Meredith NRA. It does not qualify as nationally significant and should be administered simply as among the cultural resources of the National Recreation Area.
2. Fort Matanzas National Monument, Florida. This should not have a separate identity but be part of Castillo de San Marcos NM.
3. Fort Point NHS, California. This should not have separate status but be included in Golden Gate NRA.
4. Fort Scott Historic Area, Kansas. Drop this from the list of units of the System and place in the National Historic Landmark registry.
5. Nez Perce NHP, Idaho. This concept is sound and may well serve as a precedent. However, the components of Nez Perce should be carefully reconsidered and if possible some of them eliminated.
6. Piscataway Park, Md. This was acquired to protect the view from Mount Vernon. It should be transferred to another appropriate jurisdiction or simply retained as a reservation of National Capital Parks.
7. Theodore Roosevelt National Memorial Park, N. D. should be recategorized as a natural area.
8. As presently constituted, George Rogers Clark NHP, Indiana, is no more than a memorial. If the adjacent home of William Henry Harrison and other significant properties can be acquired, the area should be retained. If not, it should be returned to the state.

9. Brices Cross Roads NBS, Miss., is an interesting though marginally significant site. Its separate designation should be eliminated, but it should be retained as part of Natchez Trace. (As noted in E, however, Tupelo Battlefield should not.)

10. The Floyd House, a detached unit of Fire Island National Seashore, is of outstanding and as yet unappreciated architectural significance. It deserves separate designation and special treatment.

11. Serious questions arise about the integrity of the setting of Fort Stanwix National Memorial, New York, and Fort Vancouver NHS, Washington. Fort Stanwix well represents facets of history badly represented elsewhere. The reconstruction, moreover, is turning out to be far less conjectural than expected. Fort Vancouver likewise recalls an outstandingly significant phase of history. It suffers from a misguided decision to deal only with fur-trade history. This has seriously cramped the park and excluded genuinely historic buildings of a later period. Fort Vancouver is now a marginal area but would be wholly justifiable if expanded to include adjacent historic properties. We recommend the retention of both these areas.

12. At Independence NHP, Pa., neither the Graff House nor Deshler-Morris House attain national significance and could be excluded.

G. THE NATIONAL PARK SYSTEM PLAN

The National Park System Plan (History) shows several historical themes well represented by units of the System and others badly or not at all represented. We believe this plan affords a useful guide for setting priorities for rounding out the National Park System but should not be used as a device for eliminating areas that meet the criteria of national significance.

H. HISTORIC RESOURCES OF THE NATURAL AND RECREATIONAL AREAS

Virtually every unit of these two categories contain cultural resources worthy of preservation and thus qualified for entry in the National Register. Several, however, should be noted as possessing exceptionally strong historical, archeological, or architectural values that, although subordinate to the natural or recreational values for which the park was established, merit special attention in the management programs of the Service. These are:

1. Acadia NP, Maine
2. Agate Fossil Beds NM, Neb.
3. Big Bend NP, Texas

4. Great Smoky Mountains NP, N. C.-Tenn.
5. Hot Springs NP, Ark.
6. Lava Beds NM, California
7. Yellowstone NP, Wyoming
8. Bighorn Canyon NRA, Wyo.-Mont.
9. Blue Ridge Parkway, Va.-N.C.-Ga.
10. Cape Cod NS, Mass.
11. Cape Hatteras NS, N. C.
12. Catoctin Mountain Park, Md.
13. Glen Canyon NRA, Utah-Ariz.
14. Golden Gate NRA, California
15. Gulf Islands NS, Fla.-Miss.
16. Natchez Trace, Miss.
17. Shenandoah NP, Va.

Robert M. Utley

Robert M. Utley

cc:
PHH
PHA
PHB

DSC-East, Mr. Bearss, Mr. Luzader
(blue envelope)



United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

OFFICE OF THE DIRECTOR

JUL 23 1973

Memorandum

To: All Regional Directors

From: Acting Director

Subject: Re-enactments of battles

This is a reminder of the policy of the Department and the Service on the re-enactment of battles in National Park Service areas.

In his report to the American Revolution Bicentennial Commission, the Secretary of the Interior declared that it will be a firm policy, during the observance of the Bicentennial, to "avoid large-scale, complex re-enactments, especially of battles. None will be permitted at areas of the National Park System." In response to an inquiry from the White House on August 21, 1972, this office stated that the National Park Service fully intends "to adhere to this policy in all National Park System areas, including those not associated with the War for Independence."

The Administrative Policies for Historical Areas of the National Park System have been revised, and are now being prepared for publication. While it is still National Park Service policy to encourage living history programs and other demonstrations of historic activities, the prohibition of re-enactments of battles and other inappropriate large-scale demonstrations is reaffirmed in the revised Administrative Policies booklet.

Russell E. Dickenson



United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:

APR 19 1974

Memorandum

To: Assistant Director, Park Historic Preservation

From: Associate Director, Professional Services

Subject: Administrative Policies for Historic Resources

Now that the administrative policies are all being revised in new format, I take this opportunity to remind you, although confident that the following have already been incorporated in your concepts, that our administrative policies for historic resources in the National Park System should reflect the recognized body of world principles expressed in the following documents: the Venice Charter of 1964, the Quito Standards of 1967, and the UNESCO Recommendations of 1968.

The formulation and acceptance of this body of principles has culminated in the adoption by the General Conference of UNESCO in October 1972 of the World Heritage Convention. As you know, the United States played a role of decisive leadership in the development of the Convention as it was finally adopted and was the first nation to ratify it.

Furthermore, the evolution of the modern international body of principles has influenced the United States internally as evidenced by such fundamental statements of public policy as the National Historic Preservation Act of 1966 and Executive Order 11593, "Protection and Enhancement of the Cultural Environment," 1971. Although the National Park Service as a land-administering bureau charged with responsibility for so many of the nation's prime historic resources should be regarded as an exemplar in both theory and practice, not only nationally but now increasingly so on the international scene, I fear that the principles underlying our administrative policies are insufficiently appreciated as indicated by the composition of annual work programs and assignment of priorities. Therefore, in carrying out the assignment of regional consultations given to you



Let's Clean Up America For Our 200th Birthday

by Director Walker, I hope that you will be able to convey the relevance and importance of the international body of principles and the relationship to it of the practices of the National Park Service.

Copies of this memorandum and the first three international documents mentioned above are being transmitted to the Acting Chief, Planning and Program Policy, the Associate Director for Park System Management, the Manager, Denver Service Center, and all the Regional Directors.


Ernest Allen Connally

Toward a new preservation ethic

By Robert M. Utley
Assistant Director,
Park Historic Preservation

A year ago the Director named me to the post of Assistant Director for Park Historic Preservation, newly established to give special attention to our historic preservation programs within the National Park System. Two-thirds of the units of the System, some 180 parks, sites, and monuments, were established because of nationally significant historical or archeological values. And virtually every natural and recreational area contains historic sites and buildings worthy of preservation, some in themselves of national historical significance. This is a marvelously rich heritage, one we are charged with passing on, with its companion natural heritage, to posterity.

In the year since I took up these new duties, my colleagues and I have traveled widely and met with regional directors, superintendents, and specialists in the many professional services disciplines that support management. Everywhere we have sounded the same warning: the historic sites and buildings in our custody are not receiving proper care; they are endangered by inadequate funding, misplaced priorities, scarcity of trained preservation experts, and failure to apply the specialized policies and standards that have been formulated for their care.

We thought we saw the reason for this situation in the traditional preoccupation of the National Park Service with nature preservation. The public identifies us with mountains, forests, canyons, and bears. We are the people in Stetsons who take care of superlative scenery and the natural features and wildlife associated with it. Our dominant "establishment," we feared, tended to see the Service in the same image as did the public, and therefore the needs of historic preservation too often lost out in competition with the needs of nature preservation.

Not surprisingly, we learned a few things ourselves in these travels. Although we are still discouraged that the Stetson does not sym-

bolize the Liberty Bell as forcefully as it does Old Faithful, we discovered that the conclusions we had drawn about the preeminence of nature preservation may have been unwarranted. In region after region we heard from senior officials a similar refrain: everything you are saying about historic resources is also true of natural resources; they too are suffering from inadequate funding, misplaced priorities, scarcity of preservation experts, and failure to apply specialized policies and standards.

If this be true, and historic and natural resources are not in competition, then where lies the obstacle to their proper care? The answer, I submit, is a system of values, or priorities, that too often ranks preservation after development and visitor services.

Development is essential, of course. Roads, visitor centers, comfort stations, and picnic tables must often be provided. So too are visitor services essential. Visitors must be accommodated, protected, and aided in every appropriate way to understand and appreciate park values. But when development and visitor services are accomplished at the expense of preservation, our ordering of priorities must be questioned. We must ask whether we are not still suffering a budgetary, programmatic, and psychological hangover from MISSION 66. We must ask whether our search for public acclaim has not allowed some of our interpretive programs to slip over the border between interpretation and entertainment.

Competition between priorities is a condition of life in any bureaucracy. There will never be enough dollars and people to do everything that should be done. Allocation of dollars and people among competing needs is not a function solely of the man or men at the top. In our decentralized system, it is in large part a product of priorities that flow from bottom to top, from superintendent to regional director to director. Thus the philosophy with which we as an institution approach our mission becomes critical.



Utley

It is almost a cliché that our 1916 organic act assigns us two not entirely compatible missions—preservation and use. But examine the language of the law carefully: "which purpose is to conserve the scenery and the natural and historic objects and the wildlife 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 first element is a simple mandate to preserve. The second is not, as usually interpreted, a simple mandate to provide for public enjoyment, but rather to provide for only such public enjoyment as is consistent with preservation. Preservation is a condition of public use. If the first element were dropped altogether, the second would still stand as an unequivocal charge to place preservation first.

Indisputably preservation comes first in law. Indisputably it comes first in logic—without preservation, the rest is utterly pointless. The time is overdue for the National Park Service to recognize the force of law and logic, to rededicate itself to the preservation ethic, to declare without equivocation that preservation comes first—in short, to embrace philosophically and carry out in our daily stewardship the fundamental mandate laid down in our organic act.