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U.S. Department  
of the Interior  
National Park Service  
Division of State Plans  
and Grants

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# Preservation Planning Series FY 82 State Program Overviews

January 1982



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# Introduction

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We have compiled here the Program Overviews that the States were requested to prepare as part of their fiscal year 1982 Historic Preservation Fund (HPF) grant application. The HPF grant application instructions stipulated that the overview was to be between three and ten pages and to comprise "a brief retrospective and prospective statement of the State's preservation program and of the means by which the State will continue to carry out the program of the National Historic Preservation Act of 1966, as amended." The overviews should include:

- . A description of the major accomplishments in fiscal year 1981 that the State wishes to highlight as helpful to other States or as useful in the Federal budget process.
- . An assessment of problems and needs in each of the three program elements--survey, registration, and protection--documented by statistical or other evidence and discussed in relation to broader State issues that affect preservation.
- . A discussion of how these needs will be met which cites supporting activities that the States consider essential to addressing these needs.

The State Plans and Grants Division has compiled these overviews in a single volume to facilitate their comparative review, to provide a State-by-State reference to the impact of the Federal preservation program throughout the country in fiscal years 1981 and 1982, and to provide one means of information exchange among the States. The program overviews are presented in unedited form and organized by region. The historic preservation programs of the North Atlantic, Mid Atlantic, and National Capitol Regions have all been administered from the Philadelphia office this year, and accordingly, these regions have been combined.

Lawrence E. Aten  
State Plans and Grants Division  
National Park Service  
Department of the Interior  
March 1982





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## PACIFIC NORTHWEST REGION

Alaska  
Idaho  
Oregon  
Washington

## WESTERN REGION

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Guam \*  
Hawaii  
Nevada  
Northern Marianas \*  
Trust Territory

## ROCKY MOUNTAIN REGION

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Wyoming

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Mississippi  
North Carolina  
Puerto Rico  
South Carolina  
Tennessee  
Virgin Islands

\* To be forwarded at a later date.





# Pacific Northwest Region



Alaska  
Hawaii  
Idaho  
Washington









## OVERVIEW: ALASKA

The historic preservation program of the State of Alaska during the last federal fiscal year suffered the loss of over 87% of the promised federal matching funds. Although the shortfall caused by the rescission of funds by President Reagan was partially replaced by state funding, the extended period during which uncertainty of funding existed sharply altered program objectives and achievements. The planning effort (objective 16) demanded by the federal requirements was postponed indefinitely as was the inquiry to the Governor's Office, State of Alaska, about landmarks suitable for study by HCRS (NPS) (objective 15). These two objectives suffered due to the necessity for all efforts to be expended on the supporting activities aimed at encouraging appropriation of state general funds. That effort was successful and the core professional staff is now wholly supported by state money. The \$48,804 received from the federal government was expended for administrative support.

Inventory activities by the State of Alaska remained at a fairly static level due to largely diversion of staff time because of funding problems. Non-staff surveys accounted for a much larger survey effort than originally estimated in the FY'81 projections. R. E. Ackerman, Washington State University, funded by the National Geographic Society, surveyed over 300 square miles, the University of Alaska surveyed a minimum of 100 square miles and the pre-construction survey section of the Office of History and Archaeology accounted for intensive survey of over 100 square miles in project generated surveys.

The first two projects were at a reconnaissance level or a combination reconnaissance and intensive survey. Smaller federal survey efforts during the federal fiscal year have not yet been reported. A major excavation effort was accomplished subsequent to signature of a MOA between NACHP, the SHPO, and the Bureau of Indian Affairs. The eligible Utkiavak Site was non-adversely impacted due to acceptable mitigation efforts. The fieldwork portion of the mitigation of impact for the Hidden Falls Site was completed under the terms of that MOA. Analysis has been scheduled by the U. S. Forest Service, Sitka.

Monitoring of the 50 currently active sub-grants, particularly the restoration and stabilization grants, has been rendered difficult to impossible as a result of the rescission of federal funds, the primary funding source for the grant administrator and historical architect positions. The latter has been funded largely from state preservation projects at Fort Abercrombie, Independence Mine, and Rika's Landing. Federal matching funds provide a part of the expense of those projects. The travel and personal services expenses required for the active monitoring of the many smaller preservation grant funded projects cannot be charged to the above projects under terms of the federal match and the State accounting regulations. Where possible, as travel to grantee locations became necessary for other reasons, inspections were performed.

The Alaska Historic Sites Advisory Committee, in concert with the SHPO, has spent the past fiscal year allocating money from previous years' budget and establishing a prioritized list of projects for funding in FY 82. Those include a number of project proposed by minority groups, the Alaska Native

Brotherhood and the Chugach Native Association for instance, which were, in part, intended to fulfill the objective of allocating a minimum 15% of the State's allocation to such groups. (Recision of funds in FY 81 prevented attaining that goal last year.) After the funds intended for support of the professional staff for the SHPO office are deleted, the remaining FY 82 money will be applied to that prioritized list.

The major problems identified in the Alaska historic preservation program during FY 81 other than funding problems were an unanticipated increase in project review requests and a continued inability to secure funding for the historical architect position. An increase in State funded construction projects small scale surface mining operations, and increased awareness of cultural resources regulations by federal and state agencies account for the increase. Six man months of assistance in review activities has been funded and currently is in the process of being implemented. No lessening of review demands is anticipated in the coming fiscal year.

In the past the inventory effort by the State of Alaska has been restricted to surveys funded by grants and performed by non-staff groups, minor reconnaissance level surveys in conjunction with other activities, and to surveys by seasonal staff for construction projects. Because of the uncertainty in planning of such surveys, little effort has been made to integrate any other than the most basic plan of action. The surveys have been aimed at sampling areas which have never been examined before in a systematic way. During the 1981 State legislative session, the legislature funded the first year of a projected 15-20 year inventory effort for resources of the state. Archaeological resources were identified and funded as one of the resources to be addressed. The inventory effort will be coordinated with the SHPO office and should provide a chance to address the question of archaeological research in Alaska under an integrated statewide plan. This plan, once it is formulated, could be included in the historic preservation plan for Alaska and provide for the first time a truly comprehensive framework. Computerization of the inventory beyond the present arrangement is expected but a timeframe cannot be predicted.

Because of the level of State funding for office operation, we anticipate the future efforts of the Office of History and Archaeology will increasingly be directed toward activities more in line with Division of Parks mandates rather than a predominately state-wide approach. While the Section 106 consultations project reviews and state-wide inventory maintenance will continue at the present level staff nominations to the National Register of Historic Places will probably decrease to a very low level. Staff time currently aimed at nomination preparation will likely be turned to interpretive activities within the State Park system. Federal agencies will be required to do more in-house consultations and the SHPO staff will only consult on, not service, federal problems. The number of workshops for nomination preparation and tax benefits will be reduced from the four during FY 81. That service to the public probably will not, however, be entirely deleted. The current practice of critically reviewing nominations when they are submitted will be continued.







PROGRAM OVERVIEWSpecial Accomplishments.

Historic Preservation Funds were used to support several special projects in Idaho in FY 1981. One of the most significant accomplishments was a two credit historic preservation course offered through the Office of Continuing Education, Boise State University. The course, presented during a two-week summer session, was taught by SHPO staff and representatives from the Northwest Regional Office, National Park Service.

Topics included preservation theory and history; archaeological, architectural, historical, and engineering sites identification, evaluation, and protection; comprehensive cultural resource management planning; rehabilitation techniques and case studies; and federal legislation, compliance, and programs.

While intensive, the course was a basic introduction to historic preservation concepts and was well received by the participants, both students and instructors. Attendees included a representative for the State Highway Department, an owner of a building listed in the National Register, and private citizens.

The preservation office was invited to send a representative to speak at meetings held by two communities, Pocatello and Hailey. Both meetings were co-sponsored by the downtown merchants and the city planning departments. As a result of these meetings, five bankers in Pocatello and two members of the city planning staff were going to the National Main Street conference in Salt Lake City sponsored by the National Trust. Because it was canceled we have been in contact with the city planner of Pocatello to distribute tax reform information and encourage further participation of merchants and planning department in rehabilitation projects. We expect to continue participation next fiscal year.

Hailey merchants organized a downtown improvement association. The president has contacted us for assistance and we have offered to provide the following services for next fiscal year:

1. conduct survey and prepare nominations for eligible buildings in downtown Hailey or all of Hailey if time allows.
2. assist planning department to prepare ordinance/historic district materials to present to city council.
3. prepare design guidelines and tax incentive information to be made available to all residents of Hailey.
4. provide opportunity for technical assistance to downtown building owners by providing consultation sessions with a representative of the preservation architect.

Further details will be available during FY 1982.

Because of the uncertainty of the acquisition and development program we concentrated on assisting with the preparation of plans and specifications for privately funded projects. Planning Grants were awarded to four property owners; one being for plans for the Atlanta Dam and Power Plant. Seven grants were awarded to FY 80 A & D subgrantees needing additional assistance. Assessment of building conditions were also provided to the U.S. Forest Service on the Treavor Cabin and to Blaine County which will result in the restoration of the County Courthouse roof by the county commissioners.

A draft copy of the Open Project Selection process was prepared by the staff. Current systems were analyzed and comment was solicited from local units of governments, regional planning agencies, state agencies, building construction/real estate organizations and minority/handicapped organizations such as the Governor's committee on Employment of the Handicapped, Migrant Council, National Association for the Advancement of Colored People, and the Idaho Inter-tribal Policy Board.

A test of the draft proposal was conducted in soliciting for subgrantees for FY 1982. Announcements were sent to newspapers, newsletters and current and prospective subgrantees according to the funding cycle. Application forms and handbooks were sent in response to all requests; applications were reviewed for completeness, then evaluated and ranked according to criteria. Successful applicants were chosen and notified.

Plans were made and an agreement signed between the State Preservation Office, the NWRO, and the State Highway Division for a cooperative bridge survey. The agreement provides for one staff member to be hired by the NWRO and paid by the State Highway Division. Supervision will be provided by the NWRO and support services by the State Historic Preservation Office. The resulting product will be an evaluated statewide bridge inventory to be used for planning and National Register identification.

Two minority overviews were completed: Japanese in the Treasure Valley and Blacks in Boise. Work on several other overviews, including Blacks in Pocatello and Hispanics in Canyon County, will be completed as part of this year's grant. This information resulted in the preparation of a National Register historic district nomination.





Problems/Needs/Solutions.

Any assessment of the problems and needs in each of the three program elements--survey, registration, and protection--must address several broad issues facing Idaho's continuing growth. There are three major developments in Idaho which will continue to affect historic preservation in the State well into this decade.

First, because approximately 64% of Idaho is owned or directly controlled by the federal government, there is heavy and increasing pressure for development on those lands remaining in state, local, and private ownership. For example, the continued growth of Boise, the capital city and largest population center, is causing a steady demand for increased housing developments. Similarly, the Thompson Creek molybdenum mining operation has caused a substantial increase in residential development in and near Challis. Increased land use for industrial purposes in Lewiston, and recreational development in the Boise Basin, Lake Pend Oreille, and Lake Coeur d'Alene continue to affect archaeological, architectural, and historic sites. In addition, state lands such as the Priest Lake area continue to be utilized for timber production and increased recreational use.

Related to the pressures caused by an increase of residential and industrial land use, many communities are allowing expanded commercial strip development. A corollary effect of this increased suburban development in many cities has been the economic decline of the central business district and the resulting pressures for urban renewal as a solution to downtown revitalization. The effect is an increased threat to city historic and architectural resources.

In essence, as Idaho continues to increase in population and economic development, the pressure to develop non-federal land is having an increasing impact on cultural resources.

The second major issue facing Idaho in the next decade involves management and use of federal lands. Although federal laws are adequate for protection of cultural resources, federal agencies in the state still do not have the staff for broad-based large scale planning and assessment work, and the prospects for improvement over the next few years appears doubtful. In terms of range management, for example, the reduced appropriation for the Bureau of Land Management will increase the responsibilities of local ranchers for compliance. This development will seriously affect cultural sites on federal lands. As timber sales and grazing continue on federal lands, the State Historic Preservation Office will have to increase its role as a key component of the compliance process.

The third major issue facing Idaho is the increase of water and hydropower developments. At present, there are at least eight major low-head hydro projects planned for the Snake and Payette Rivers, and hundreds of small-scale projects planned statewide.

#### Survey:

As mentioned above, the pressures of development are forcing an increased need for completed overviews to plan better survey procedures required for archaeological, historic, and other cultural resources. Those we have completed (e.g., Clearwater River, Boise Blacks, Japanese, mining) clearly demonstrate their value. Of particular need for the near future is the completion of overviews for southwestern Idaho. See Supporting Activities 1.1 and 2.1.

There is also an increased need to focus surveys in areas where impacts are greatest; for example, Boise Valley and Lower Clearwater drainage. Natural resource exploration and development activities and continued urban

development will require an increased effort by the Historic Preservation Office to intensify survey activities in these areas. See Supporting Activities 1.1, 1.2, 2.1, and 2.2.

In accordance with the requirements of the National Historic Preservation Act Amendments of 1980, the Idaho office is holding 10% of its total federal appropriation in reserve for allocation to local units of government. In this regard, the Historic Preservation Office needs to establish criteria for local surveys as part of the certification process. While not addressed directly as a supporting activity, the Idaho office during FY82 will be working closely with local governments to determine local survey needs, establish a reasonable level of documentation to meet those needs, and establish criteria for professional and accurate accomplishment of that level of documentation. See Supporting Activities 1.6 and 1.7.

Finally, improvements in our computer retrieval system are needed to facilitate extracting archaeological, architectural, and historic sites information. During FY82, the Idaho SHPO staff will be meeting to redesign the state inventory to ensure compatibility with the new Word Processer/display writer which the Historical Society has purchased for our preservation program this year. See Supporting Activity 1.5.

#### Registration:

The only significant problem/need regarding the registration component of the program concerns the current freeze on new National Register listings. Until new regulations are adopted by the Department of the Interior, the Idaho office will continue to document and prepare nominations for eligible properties.

Protection:

At present, federal regulations (36 CFR 800) are generally adequate for protection of cultural sites on federal lands and from federal projects. However, we continue to have a problem with protection of sites on private and state lands from private and state projects. It is essential, therefore, that Idaho's program continue with the completion of overviews to identify major cultural sites, sources of impacts, and protection needs. Because recent trends in our federal state cultural resource protection partnership emphasize increased state and local participation, advance planning at the state and local level will be even more important in the coming years. To this end, the Idaho program will emphasize improvement in our resource protection planning process (RP3) during FY82. Supporting Activities 1.1, 1.5, 1.6, 1.7, 2.1, 2.4, 3.1, 4.3, 5.2, and 5.3 all relate to this aspect of the program's protection component.







## PROGRAM OVERVIEW

The rescission of Fiscal 1981 funds has left Oregon with a "caretaker" program. No survey or planning funds were passed through to local entities. Survey work was limited to that in connection with federal undertakings. Review and compliance -- viewed as a mandate of law -- continued in its normal function. We have continued to place strong emphasis on our registration program because of its popular appeal with regard to state and federal tax incentives. However, the moratorium on Register listings has left us with a large backlog of unforwarded nominations which in turn will reduce the effectiveness of the state tax incentive program. That program has also undergone legal and legislative challenges during the past year, some of which are still pending. Grant-in-aid activity for Acquisition and Development purposes has been limited to mopping up funds from past fiscal years. A difficult state legislative session consumed large amounts of time and energy. Planning of any kind has been all but impossible. Truly, more time and energy has been devoted, of necessity, to program maintenance than to development and implementation. The state ends the federal fiscal year unreimbursed for the full federal share of out-of-pocket program expenses.

Yet, some accomplishments must be noted. A moderately successful "Traveling Workshop" was taken to five Eastern Oregon communities. A serious challenge to the state tax incentive program did not survive legislative review, better legislation regarding Indian burial sites was enacted, and good progress was made in developing better public awareness of the importance of archeological sites.\* The Historic Preservation League of Oregon, a private statewide preservation organization, has grown and matured markedly during the past year. And, with the support of SHPO's parent agency, the office has suffered no reduction of staff and only minor loss of state budgeted funding for the 1981-83 biennium. However, by budget note, the state appropriation is available only to match federal funds. A review and overhaul of cultural resource protection procedures pursuant to Oregon's statewide land use planning law promises to yield more effective results.

With the uncertainties surrounding the availability and extent of federal funding, exact plans for Fiscal 1982 are difficult to make. However, we plan the following overall thrust and emphasis:

Survey and Planning

About \$75,000 is needed annually to pay the federal share of program administrative expenses. We plan to pass all the remainder of the state's apportionment, but in no case less than 10 percent of the whole, on to entities other than ourselves. As best as can be foreseen now, this money will be used for two programmatic functions: local surveys and to assist the proceedings of a Legislative Interim Task Force on Historic Preservation.

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\*SHPO assumed responsibility for the maintenance of statewide archeological site files and assignment of Smithsonian site numbers from the University of Oregon.

We see the Task Force as highest in priority, though its funding is not mandated by law. The purpose of the Task Force is to develop state legislation that will carry cultural resource management and related programs through the 1980s, independent of federal programs, if necessary.

Under Oregon law, all cities and counties are required to develop comprehensive land use plans that include identification and protection of historic sites. As in past years, we intend to pass a sizable share of apportioned funds through to local governments to assist local surveys. Exactly how much will be determined after regulations pursuant to the 1980 amendments to the Historic Preservation Act have been promulgated and Task Force budget requirements and funding authorization have been established. We hope this to be by the end of January, 1982. \$212,000 (total project costs) in unfunded survey requests are currently on file, and others will be forthcoming if it is learned there may be funds to apply for.

### Registration

We plan no major changes to our registration program. This program enjoys one of the highest property-to-staff ratios in the nation, and one of the lowest rates of returned documents. Our chief concern will be getting the backlog of unforwarded nominations, due to the federal moratorium on nomination of private properties, processed by the National Register. Because court decisions have required that properties be actually listed in the National Register before application for special assessment under state law can be made, the backlog of unprocessed nominations means reduced effectiveness of the state tax incentive program and subsequent rehabilitation of historic properties.

### Protection

Overall, we believe that our Review and Compliance program is working smoothly and well. Planned changes are minor and evolutionary in nature. We are looking into revising programmatic memoranda of agreement with two federal agencies to speed up and simplify procedures. Continuing emphasis will be placed on the transfer of survey information to quadrangle sheets for rapid reference. We also plan to continue strong emphasis on the problem of looting of archeological sites through public education as well as enforcement of pertinent state and federal laws.

An important aspect of our protection program will be to continue to review all local Comprehensive Plans with regard to their identification and protection mechanisms.

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## PROGRAM OVERVIEW

1981 Accomplishments

There can be little doubt that FY 1981 was the most critical period for the state historic preservation effort since its inception in 1967. Never had the interrelated survey, registration, and protection of significant resources been so threatened, and never were the prospects for the future so uncertain.

Two events precipitated the condition. The first was the rescission of a portion of the FY 81 Historic Preservation Fund, which wiped out all grants to historic properties and for surveys, and threw the entire weight of complying with the Grantee Minimum Requirements on the state. The second was the need to payout substantial sums to honor survey and planning contracts made under the previous administration. Since the documents had failed to restrict payment to federal grant receipts, funds had to be issued from the state's already burdened matching share, further depleting support for program activities. The reduced state share was not adequate to provide for all activities, and by the end of the fiscal year, contract and support positions had been cut by 60% and permanent professional positions reduced to half the FY 80 levels. Meanwhile, Washington State government was experiencing its own financial problem. In September, the Governor ordered all agencies to reduce their 81-83 biennial allotments by 10%, and to make plans for additional reductions up to 20%. The full impact of such substantial reductions to the historic preservation program have not been felt completely at the end of FY 81, but it is expected that the total measure of the result will be known very early in FY 82.

Although the concluding month of FY 81 was decidedly grim, the accomplishments achieved over the span of the year were gratifying in terms of continued and effective service. Almost all Grantee Minimum Requirements were satisfied substantially despite funding reductions, and a new protection program was begun that could turn out to be an increasingly useful tool.

**Survey:** No new survey grants were issued in FY 81. That year's Preapplication identified the initiation of survey activity in three previously unexamined counties, but in the Application survey activity was revised to include only the counties receiving survey and planning grants in FY 80. The HPF rescission meant that none of the counties received grants, and as a result, county surveys for historic resources came to a halt. Program funds from FY 80 continued several months into FY 81 to allow for transition, so the results of FY 80 and partial FY 81 survey were received, reviewed, and added to the inventory on a continuing basis throughout FY 81. At the end of the fiscal year, the state office had received 2,257 historic property inventory forms from 12 counties, representing the product of a reconnaissance survey covering 22,141 square miles.

During the year, work began with an agency contract historian to survey and inventory industrial and engineering sites in the state, a subsequent phase to the state's historic bridge inventory, begun several years ago. The historian started the research and surveyed 10 of the state's 39 counties.

The Marine Archaeology Survey continued in the fiscal year in the effort to establish a system into which maritime related resource information could be fed. Accordingly, there has been no real emphasis on survey in the project, and it has produced in the year a comprehensive bibliography of the maritime history of the Pacific Northwest, a compilation of 800 listings available in computer format through the Washington Archaeological Research Center (WARC). Programming was substantially completed for a computerized maritime site storage and retrieval system, again available through WARC, which will be ready for data entry in FY 82. The Survey has identified several hundred shipwreck sites and during its six week field session, completed mapping the site of the floating drydock at Dockton, on Vashon Island.

**Registration:** To provide increased exposure to review board members in the application of National Register criteria, and to allow more expeditious review of properties submitted by private proponents, the number of review board meetings was increased from four to six in FY 81. To hold costs to a minimum, the time and location of the meetings were selected to reduce travel and per diem costs. Formerly, the review board traveled to different parts of the state for its meetings; all recent meetings have been held at a single site in western Washington, and it is anticipated that relatively few meetings will be scheduled elsewhere.

The state review board -- the State Advisory Council on Historic Preservation -- examined 57 properties during the reporting period and recommended 44 of them to the State Historic Preservation Officer for submission to the National Register. Most of these represented privately owned properties, and because of the suspension of private property listings in the Register, were not forwarded. During the hiatus, the review board has considered private properties following a notification procedure which informed the owners of the effect of pending regulation and invited the owner to decline the review of the property if desired. No owner exercised the option to delete the property from the Council's agenda. Since interest in registration is high, it was felt that this procedure would fulfill the desire of most proponents and still be in compliance with PL 96-515.

Of the total nominations reviewed, almost half (47%) were of properties identified in FY 80 and FY 81 county surveys; the remaining portion was the result of designation interest on the part of the owner, the possibilities of tax advantage, or identifications in earlier surveys. Reflecting the trend of recent years, only 10% of the total were researched and written by state office staff. However, all nominations received from other sources were carefully reviewed by the staff, and sometimes almost totally rewritten to meet present standards of adequacy. Two thematic nominations were reviewed -- state historic bridges and the missions of Stevens County -- and a thematic on state Carnegie libraries was completed and readied for review in FY 82.

**Protection:** Properties identified through surveys are added to the existing body of cultural resource information contained in the agency's electronic data storage system. This comprehensive collection of inventory data and Register information serves as the primary tool in the protection element.

We have maintained the review system established in 1980. A useful adjunct to the process has been the use of Coastal Zone Management funds to retain an archaeologist specifically to review the many water related projects. The grant provides 80% assistance. At the close of the fiscal year, the position was vacant, but a candidate had been selected and awaiting word on the issuance of the grant for state fiscal year 1981.

Several other aspects of protection have been helpful. We have had some success using volunteers to cull and organize survey reports so that the material might be more accessible to the professional staff performing environmental review. There has also been success in the recruitment of professionals and interns to periodically assist in some types of review activity. These are donated hours and depend to a large extent on the good will of the individual involved, but to date the limited volunteer effort has been beneficial.

While such protective measures apply most distinctly to environmental review, the state has also taken other steps which can offer protection to a wider range of resources. In its recent session, the state legislature considered several bills which would protect certain classes of historic properties through hearings on the issuance of demolition permits and property tax relief. Both bills were heard but did not complete their circuit through the House and Senate; it is planned to reintroduce these and other bills in the next session. Also important in protection is the recently enacted easements program. In return for maintenance and rehabilitation work, the state office has agreed to hold facade easements of major designated structures; in turn, the building owners establish a limited partnership which can take advantage of the tax credit program. Properties valued in excess of seven million dollars have participated in the program to date. An additional planned activity, the grant support of plans and specifications for designated buildings, did not come about because of the HPF recission.

#### Assessment of Problems and Needs

In any analysis of the problems and needs of cultural resources in the coming fiscal year, special attention must be given to the condition of the State Office of Archaeology and Historic Preservation. As outlined in the previous section, the state program office has suffered from internal and external events. Within the first month of FY 82, the state staff will drop to four permanent positions: the SHPO, the Chief of the Office, an archaeologist, and the agency's administrative assistant. While the SHPO meets the qualifications under 36 CFR 61 for an historical architect, and while the Chief meets the qualifications for an historian, there will be no architectural historian. The agency will thus have one position less than the minimum standards set forth by state law as well as federal regulations. It is not merely then what conditions surround cultural resources in the state, but the larger question of what prospect is there for continuing in any way survey, registration, and protection. Given the receipt of HPF support in FY 82 and the rebuilding of the agency's matching share, the program could return to its FY 81 levels of personnel and activity. However, if there is no HPF support in FY 82 and if no aid is forthcoming from state sources, then the program will be further reduced and will probably cease to exist by mid-FY 82.



Survey: When grants from the HPF were at their highest, the state issued substantial portions of its allocation to local governments to conduct county surveys and help establish area preservation programs. Surveys were conducted in 19 of the state's 39 counties. There was considerable variety in the quality of the survey technique, the zeal of the individual surveyors, and the total area covered, but in the main it was a productive use of HPF monies. It was this program, conducted over a three year period, that provided the major survey activity in the state. However, the grants went to the areas that had the necessary 50% match, and not necessarily where resources were concentrated. The remaining 20 counties have not received any comprehensive survey; "landmark" properties have been identified long ago, but the whole fabric has not yet been investigated.

The county surveys identified the conventional material of historic preservation interest, and as a supplement, the state program office conducted two specialized surveys: historic bridges and industrial/engineering properties. The bridge survey is complete and the industrial/engineering survey is in progress, and it will be continued in FY 82 as far as funding permits. Washington is not a heavily industrialized state, but the survey has already revealed an impressive and unanticipated diversity: pulp factories, ore concentrators, dry ice manufacturers, and grain tramways are but a few examples.

While the industrial/engineering survey concentrates on one important aspect of the state's patrimony, there are others of equal importance that have not been examined. Significant among these are properties that reflect our ethnic heritage. Some sites are known: a handful of black-related properties in Seattle, Tacoma's Pole Town, "Chinese Gardens" in Port Townsend, a Japanese Language school, and a scattering of Hispanic sites in eastern Washington; but these are only the identified elements of a resource whose range and breadth is not known. There must be a greater effort to expand the survey to cover minority and ethnic population in a substantive way, and to alert the public to the need for such a survey.

Survey information is of value only when incorporated in the state inventory and made available to planners, project proponents, and officials. The state has an effective computer-based storage system for the inventory that incorporates the results of survey and registration activity. The system is a key feature in the state program and is heavily used by private businesses and local governments alike, as indicated in the FY 81 End of Year Report. Maintaining the state inventory as a public service will be a difficult task in a reduced program.

Registration: The designation of properties to the National Register of Historic Places remains one of the most visible and widely supported preservation activities. In addition to nominations developed from survey data, individual property owners, city and county governments, and federal agencies continue to seek designation for properties they believe are qualified. Since the recent passage of the Economic Tax Recovery Act of 1981, inquiries concerning designation potential have increased 15% at the end of FY 81. Assuming that many of these inquiries will result in nominations, the state's review capacity may become burdened: 24 nominations are already scheduled for review in FY 82, half of the total anticipated for the fiscal year. Owners concerned



about their financial well being may be more insistent about the review of their properties, and may come to dominate registration activities at the expense of survey-based nominations or those from other sources. Additionally, the reduction in the number of review board meetings from six to four per year as a result of financial constraints will hamper expeditious review. To date, nominations have received review usually within a few months of receipt. A three year overview of nomination activity concluded in 1980 demonstrated that 52% of the nominations received by the state office were seen by the review board within one to three months of receipt, 29% within four to six months, 10% within seven to nine months, and 8% from ten to twelve months. Increasing the number of nominations received and decreasing the number of review board meetings may cause delays in significant properties reaching the Register in a timely fashion.

Since the state staff prepares few of nominations seen by the state review board, any increased interest in nomination activity will be damped somewhat if the development of the nomination form itself is difficult for the proponent. For every property owner who is interested in designation, there must be a rapid response; and for every potentially eligible property, there must be an accurate nomination. These two demands will tax the services that the state office can provide.

**Protection:** With the increasing number of large energy projects (Northern Tier and Transmountain pipelines, and the rapidly expanding number of low-head hydro possibilities), massive mining enterprises (Mount Tolman molybdenum extraction) and the many small constructions that impact the state's extensive shorelines, the protection of identified cultural resources continues to be an important charge. In a time when government regulations has become identified as a major ill that requires immediate attention, resources now protected by federal regulations as well as state and local legislation may become threatened.

The existing method of handling environmental documents has been in place for several years, and it is by and large an efficient system given the number of reviews required and the small staff assigned to the task. In FY 81, about 50% of the reviews were handled within 30 days or less, and about 40% within the following 30 days. Major review responsibility sets upon the staff archaeologist, who in FY 81 was aided by a contract inventory data entry position and a Coastal Zone Management archaeologist. The efficacy of environmental review is based upon these three positions working in concert, however, at the end of FY 81 there is little immediate prospect of continuing the contract position and the agency may have to move to smaller quarters which might preclude the continuance of the Coastal Zone archaeologist. If the staff archaeologist is left to handle the projected FY 82 review load of 5200 events, substantial modification will have to be made, a change which cannot help but affect the protection of cultural resources.

Equally important for protection is the body of state and local law which addresses designated properties of historic significance. Recently, some local ordinances protecting National Register districts have been threatened; the town of Coupeville in the Central Whidbey Island Historic District has reduced the protective capacity of its local ordinance substantially, and in LaConner, the historic district ordinance may be done away with completely. The best protection occurs at the local level, and it is critical to support existing ordinances and where none exist, to encourage their adoption. Preservation can be greatly strengthened by the certification of local governments, and new efforts must be

made to develop interest in protective ordinances and certification in the area of significant resource concentration. Similarly, the state can help protect historic properties by mandating the review of their demolition when threatened by a state agency, and by easing the burden of property tax on well maintained or rehabilitated house and commercial buildings. Supplemented by additional techniques, resource protection can grow to a network of advantages augmented by state and local legislation.

### How Needs Will Be Met

As outlined in previous sections, the response of the state preservation program to cultural resources issues will be wholly dependent upon its capacity to survive financial reductions of substantial magnitude. The state program in FY 82 may take any form from its FY 81 level of eight permanent positions and from two to three contract positions, to the termination of the program for lack of funds by mid-FY 82. For the purposes of this application, it is assumed that the state office will continue with the four permanent positions planned at the beginning of FY 82. The four positions will be the SHPO, who will also act as the historical architect; the Chief of the Office; who will also act as the historian; the staff archaeologist; and agency administrative assistant. The position of architectural historian will be left vacant until funding is such that an individual can be hired. The state program will not meet the standards of 36 CFR 61 at this staffing level, but it is believed that the state program can still be approved under PL 96-515 since together the SHPO and Chief represent about 25 years of familiarity with historic structures and buildings in the state. While it is not intended that their cumulative experience be represented as supplanting the need for an architectural historian, it is believed that it will be sufficient on an interim basis to address certification under existing tax incentive programs and most registration activity.

Basic to the state's response to preservation needs is the involvement of certified local governments as specified in PL 96-515. The state will hold 10% of its apportionment in reserve in order to implement local government pass-through, pending further instructions from Congress and the National Park Service.

**Survey:** Survey activity will be based on the results of the grants to local governments authorized under PL 96-515, specialized survey projects using contract personnel, and organizing volunteers for limited survey tasks.

Under this approach, certified local governments will be encouraged to complete surveys already begun and initiate new surveys where they are needed. A disadvantage of this approach is that most certifiable local governments are in areas previously surveyed. However, if the state's award from the HPF is above the planning estimate, it will be possible to offer grants to counties not yet surveyed with the hope that the matching share of 30% will make it possible for them to participate. Under this approach, the minimum 10% will be offered to agencies meeting the requirements of PL 96-515, and any additional amount above the planning estimate will be offered to counties not previously surveyed. Because of the heavy expenditures from the state match already referred to, the state will not be able to provide financial support to perform its own county wide general resource overviews in unsurveyed counties.



For at least a portion of FY 82, the state will maintain its level of effort in the industrial/engineering survey. The intent is to continue the survey throughout the year and complete a reconnaissance in 20 counties. Should funding be insufficient, the activity will conclude in December, 1981, with 10 counties surveyed. Again depending on grant award levels, we will encourage special ethnic/minority surveys through ethnic/minority organizations and educational institutions. Two high priority areas of concentration will be sites related to Japanese immigration and Volga German communities. It is anticipated that these surveys will be largely volunteer efforts, and a training and monitoring program will be part of state program activities. We will also encourage volunteers in counties not yet surveyed. A preliminary FY 81 review of this technique in five eastern Washington counties demonstrated that volunteers cannot be depended upon to be interested in survey generally or in surveying where the highest concentrations of properties are located. Both the volunteers and the areas to be surveyed must be carefully chosen, and it is not likely that complete counties can be covered in a uniform manner. However, it is anticipated that volunteers can make useful and necessary contributions to the general level of cultural resource information when their own interests coincide with program goals. A limited amount of volunteer survey work is planned for Jefferson and Okanogan Counties. All survey activities will be accomplished by a public information program based on news releases and newsletter items.

The state will continue to add sites to the electronic data storage system and to upgrade the inventory on a continuing basis. Should funding be sufficient, this work will be done by contract; if funding is not adequate, it will be undertaken by one or more volunteers.

**Registration:** Meetings of the state review board will be reduced from six to four meetings per year, with from 10 to 12 nominations scheduled for each meeting. Since the total number of nominations likely to be submitted to the state office for consideration will probably exceed the capacity of the four meeting schedule, nominations will be scheduled on the agendas of the review board only when they are complete and accurate in all respects. Threatened properties will have priority. In some cases, it may be possible to review nominations through the mail. The practice would be entertained only with the approval of the property owner, the appropriate local government, and the review board, and in the absence of opposition from the public. Mail review would not replace the scheduled public meetings of the review board and would only be used in selected instances to prevent the accumulation of completed nominations throughout the fiscal year.

In addition, the state will continue to distribute its detailed instructional guide to the preparation of National Register nominations as well as its compilation of private individuals and agencies that prepare nominations. Coupled with the training session outlined in the Department of the Interior Preservation Agenda for the 80's, there should be sufficient resources available to assist interested proponents in the completion of a sound nomination for their property. The evaluation and editing, as required, of all nominations will continue with existing staff.

Protection: The in-place environmental review system will be maintained and the Coastal Zone archaeologist position will be filled. During the fiscal year, the state will introduce charges for the review of environmental documents. While this will not produce income directly usable by the agency, it will add justification to the state legislature for continued support. Volunteers and intern positions will also be used to assist the permanent positions.

Every effort will be made to assist local governments address their protection needs. The state office will continue to support the retention and adoption of ordinances in such locations as LaConner and Bothell, and will work with locally designated officers to improve or maintain adequate treatment for cultural resources in decision making processes. It will assist in the certification of local governments, and will work initially with existing preservation programs in Seattle, Tacoma, Spokane, and in King, Snohomish, Pierce, and Clark Counties. During the year, an effort will be made to alert local governments to the advantages of certification, using such techniques as news releases, newsletters, and meetings.

Although no acquisition and development grants are anticipated within the FY 82 planning estimate, properties will receive protection from the continuation of the easement program. In addition, should the FY 82 grant amount allow for it, the state intends to make available small grants to assist in the preparation of plans and specifications for designated properties. More property owners could receive the benefit of program experience in this fashion than through development grants, and a greater number of projects could be handled by the contemplated reduced staff. It is not intended that the agency would nor could monitor projects in the construction phase to see if the grant-assisted plans were being fulfilled, but only to create plans and specifications which are consistent with the Secretary's Standards. It is likely that such plans will govern any construction project to its completion. To assist homeowners in planning small projects they are likely to carry out themselves, the agency will conduct at least two Old House Workshops. Drawing heavily upon local examples and local experiences, the program will emphasize techniques which are appropriate to historic properties.

# Western Region



American Samoa

Arizona

California

Guam

Hawaii

Nevada

North Carolina

Princ. Territory















## ARIZONA HISTORIC PRESERVATION PROGRAM

## PROGRAM OVERVIEW FY1981-1982

The Arizona Historic Preservation Program underwent many dramatic administrative and legislative changes in Fiscal Year 1981. During the year the staff doubled in size; a Task Force appointed by the Governor convened to address historic preservation legislation; a national preservation conference was held in Tucson; drafting of a Comprehensive State Historic Preservation Plan was initiated; Section 106 review ensured the identification and protection of hundreds of sites; survey activities far exceeded estimated projections, but registration decreased with the freeze on the listing of privately owned properties; ten Acquisition and Development subgrants were approved but not funded; and uncertain future federal funding was damaging to the credibility of the program.

At the start of the fiscal year there were two full-time, permanent positions: SHPO and Archaeologist, plus a temporary Historian, a part-time secretary and a part-time grants manager. At the end of the year the staff included SHPO, Archaeologist, Historian (State funded as of 1 July 1981), Architectural Historian, Review and Compliance Assistant, full-time clerical, half-time Grants Manager, part-time volunteer Librarian and vacant position for Historical Architect (State funded as of 1 July 1981). The increase in staff in the third and fourth quarters has helped to alleviate the administrative "backlog" that had resulted from previous staff inefficiencies. The following program areas particularly benefited from the improved administration: grant management; recording of sites to the State Inventory; review and compliance; and information dissemination.

The monitoring and fiscal management of new and pre-existing grants improved throughout FY81 as a result of the management system established in FY80 and increased staff. Internal audit of grant projects by both staff and outside consultants was undertaken during the third and fourth quarters which should offset future federal audit penalties. Increased staff allowed a better review of both A-and-D and S-and-P subgrant projects. The FY81 survey-and-planning subgrants were very carefully monitored and structured, representative of an effort to improve the quality of survey reports throughout the state. The more effective management of grants provided prompt initiation of the FY81 subgrants despite the three-month delay in the 1981 work program submission. The initiation was extremely important due to the delayed start of many of the FY80 subgrants that led to incomplete projects.

The A-and-D subgrant program benefited from the improved fiscal management and monitoring; however, lack of a Historical Architect impacted the level of technical assistance and review. Further, ten FY81 A-and-D projects approved in the Regional Office did not receive funding due to the February rescission, thus eliminating this major component of the FY81 program.

The improved administration of the SHPO was demonstrated by the number and quality of documentation of properties recorded on the State Inventory. The properties recorded far exceeded the projection. The submission of

the final documentation of the FY80 subgrants and the federal agency identification of resources provided the majority of the properties, but the increase and improved method of listing are attributable to increase in staff. Two graduate-level interns recorded sites throughout the second and third quarters, and a Review and Compliance Assistant was hired half-time during the fourth quarter to maintain, update and correct recordings on the State Inventory. The documentation generated from FY81 S-and-P subgrants should dramatically improve the quality and number of recordings as a result of increased supervision.

The hiring of a Review and Compliance Assistant enabled more thorough and prompt review of federal undertakings involving historic properties. The procedure became much more efficient and productive, making review less complicated. Nonetheless, thorough review of all projects and timely response was not achieved due to the overwhelming number of federal undertakings in Arizona.

During the third and fourth quarters the increased staff worked to improve the "outreach" educational programs and dissemination of information. A more efficient method of responding to information requests was revived and the staff conducted numerous lectures, made public appearances -- with media coverage -- and participated in important conferences and meetings throughout the State. Several of these conferences incorporated preservation issues into the agenda, including the Annual Convention of the Arizona Historical Society, the Annual Meeting of the Arizona Association of Planners, and Downtown Revitalization in Rural Arizona.

Improved educational programs also led to the development of better liaisons with State agencies, statewide nonprofit organizations, neighborhood groups and educational institutions. Coordination of efforts was initiated between the SHPO, Arizona Historical Society, the Department of Library Archives & Public Records and the Office of Economic Planning & Development (OEPAD). Subsequently, the Arizona Historical Society has agreed to provide two pages in its bi-monthly newsletter for preservation issues; Library, Archives & Public Records has agreed to share equipment and archival material. OEPAD took a very active role through sponsoring a Statewide preservation conference, coordinating the Governor's Archaeology Advisory Group, coordinating and administering the Governor's Task Force on Historic Preservation and sending a staff member to the "Cut the Red Tape" conference sponsored by the Advisory Council.

Liaison with the State Land Department and Arizona Department of Transportation was strengthened with a signed MOA between State Land, BLM and SHPO regarding federal land transactions and the commitment of Arizona Department of Transportation to historic preservation activities with the hiring of a full-time archaeologist.

Coordination with federal agencies was also improved. Close communication was maintained with National Park Service, Bureau of Reclamation, Bureau of Land Management, Bureau of Indian Affairs, Office of Surface Mining, United States Forest Service, Federal Highway Administration and other federal agencies active in Arizona projects.

SHPO and staff worked with nonprofit groups to catalyze private sector involvement in preservation activities. The National Trust for Historic Preservation jointly sponsored with OEPAD and Heritage Foundation of Arizona a "Main Street"-oriented conference entitled "Downtown Revitalization in Rural Arizona", which had excellent participation from a wide base of constituents from throughout the state. The National Trust also conducted one of its four national "Conserve Neighborhoods" conferences in Arizona. The conference, held in Tucson in July, successfully focused upon Tucson's many historic neighborhoods, enjoyed national participation and received excellent media coverage.

The statewide nonprofit, Heritage Foundation of Arizona (HFA), and the SHPO worked together to address preservation issues, particularly at the local level. HFA published materials provided by the SHPO in its bimonthly newsletter, coordinated the Downtown Revitalization conference with technical assistance from the SHPO and lobbied for the increased funding of SHPO at both the state and federal levels.

The close liaison between the active statewide organization, the Arizona Archaeological Council (AAC) was maintained. A special committee, the SHPO Liaison Committee of the AAC was established and met bimonthly throughout the year. The Liaison Committee identified its principal purpose as the examination of a comprehensive state historic preservation plan to increase the efficiency of SHPO operation. The Committee, with ex-officio representation by SHPO and staff archaeologist, evaluated the effectiveness of adapting the RP<sup>3</sup> model to suit Arizona's unique resources. The Liaison Committee, through AAC, received a FY81 survey-and-planning subgrant to compile its research and outline a draft comprehensive state historic preservation plan.

Local historical societies and civic clubs were encouraged to become involved in preservation activities. Projects were undertaken in a number of communities, including Scottsdale, Tempe, Tombstone and Florence. Two subgrant projects were contracted with local nonprofit organizations, the Women's Club of Globe and the Casa Grande Historical Society, Inc. for survey projects, and the Globe-Miami Historical Society is involved with a survey grant awarded to the Central Arizona Association of Governments for a survey of the Globe area.

Neighborhood groups received a great deal of attention during FY81 in coordination with Preservation Week and the Conserve Neighborhoods conference. Two neighborhood groups, the Pie Allen Neighborhood Association, Inc. and the Roosevelt Action Association received subgrants for survey and planning activities. The SHPO and staff frequently consulted with neighborhood groups around the state, including organized groups in Yuma, Phoenix, Tucson, Prescott and Flagstaff.

The three universities in Arizona offer preservation-related courses that include participation by SHPO staff. The SHPO conducted meetings in an attempt to institutionalize these programs and provide technical assistance and expertise on the state and federal historic preservation programs.



The 'formal' establishment of historic preservation programs at the three universities has just been initiated and will require additional consultation to focus the direction and ensure that the programs will be comprehensive and interdisciplinary. The universities were heavily involved with preservation activities. Arizona State Museum (ASM) at the University of Arizona was awarded a large FY81 subgrant to undertake an archaeological survey. ASM also completed a number of surveys for federal agencies under the direction of the SHPO. as did Arizona State University.

Legislative, political and budgetary issues impacted the preservation program throughout FY81. The Governor's Task Force on Historic Preservation met frequently to review existing state legislation and to propose alternatives. The final recommendations, to be presented to the Governor October 29, 1981, suggest implementation of legislation and procedural rules that would institutionalize and provide increased authority for the SHPO at the state level. Further, the Task Force has publically examined the current administration of the SHPO illuminating the conflicts and achievements the program has experienced.

Support of historic preservation at the state level was demonstrated with the funding of two positions, Historian and Historical Architect, as of July 1, 1981, and the passage of a strengthened Antiquities Bill increasing the penalty for vandalism of archaeological sites from a misdemeanor to a felony. In addition, at the recommendation of the Governor's Archaeology Advisory Group, a large sum of state funds was appropriated to protect a northern Arizona archaeological site.

Nationally, the December passage of the Amendments Act of 1980 to the National Historic Preservation Act of 1966 presented sweeping, positive changes to the state and federal historic preservation program. Many of the objectives of the 1980 Amendments were integrated into the 1981 work program and were achieved through subgrants and administrative activities; in particular, the survey of nonfederal lands projected for intensive development, the enhancement of local government's preservation capabilities and the development of comprehensive state historic preservation plan. However, regulatory implementation of the 1980 Amendments Act has been delayed and remains uncertain. The regulatory freeze and subsequent delayed review process prevented the listing of privately-owned properties on the National Register during the second, third and fourth quarters. This created backlogs, generated public dissent and frustration, and provoked program inefficiencies. Further, other important elements of the Amendments Act have not been implemented or appropriately regulated, preventing appropriate efficient program development at the state level.

Uncertain federal budget projections contributed to the lack of implementation measures for the 1980 Amendments and were further damaging to the credibility of the operations of the SHPO. None of Arizona's 1981 A-and-D projects received funding as a result of the February rescission, despite submission before the deadline and approval at the Regional office. This was further dramatized with the nine month debate over 1982 funds, an issue still unresolved. This uncertainty has hurt the program, requiring staff

time to keep up with the periodic changes in the budget projections and to inform constituents, as well as complicating future State budget projections and planning for program development. To offset the delay or possible termination of SHPO administration at the end of the 1981 fiscal year, \$33,800 will be transferred from the FY81 Work Program to compensate FY81 SHPO operation. This amount does not reflect a failure to satisfy 1981 objectives (except A-and-D projects) and will be used to fund review and compliance activities and provide match for state funded personnel.

Many of the problems encountered during FY81 will be challenged in FY82. The FY82 Arizona Historic Preservation Program will be dedicated toward satisfying the objectives of the Amendments Act of 1980 and further improving the internal administration of the program operation. The FY82 HPF Application projects an increase in staff of two professionals, an Environmental Review Specialist and a Community Survey Coordinator. The Environmental Review Specialist will augment the productivity of the review and compliance procedure, enabling timely response and more thorough review of federal undertakings. Assisted by the Architectural Historian, the Community Survey Coordinator will develop a survey methodology and new state inventory form to standardize inventory data. The Community Survey Coordinator will be located at regional locations to undertake survey activities in areas projected for intensive development and work with local governments.

Development of survey methodology and the projected increase in inventoried properties will greatly improve the State Inventory. This will be enhanced by a proposed subgrant to fund a feasibility study to record all inventory sites on the SPIRES system utilized by Arizona State Museum (ASM) and the maintenance of a terminal in the office of the SHPO. Previous subgrants have been awarded to ASM to develop and maintain this automated system, and its success there has warranted its trial in the SHPO office. Other subgrants will be awarded to fund surveys, particularly in areas threatened by urban redevelopment such as an Historical/Architectural Survey of Downtown Tucson, an Historical/Architectural Survey of the Encanto neighborhood in Phoenix, an Historical/Architectural Survey of Tempe, and an Archaeological Planning Study of Maricopa County and areas threatened by energy resource exploration, including an Historical/Architectural Survey of the towns of Douglas and Williams and Greenlee County.

The improved survey methodology and subgrant surveys will catalyze National Register nominations of significant properties and districts. Registration will be pursued internally for numerous properties eligible for the Register recorded in the State Inventory. In addition, subgrants will be awarded for registration projects, particularly district and multiple resource area nominations. As a result of FY82 subgrants, we anticipate nominations for historic districts or multiple resource areas in the following communities: Maricopa County, Phoenix, Tempe, Chandler, Greenlee County, Tucson, Globe, Miami, Douglas, Williams, Clarkdale, Cottonwood and Yavapai County.

To further enhance survey and registration, a comprehensive State Historic Preservation Plan will be drafted in FY82. In compliance with the Amend-



ments Act of 1980, the plan will enhance the identification of properties early in project planning. Like RP<sup>3</sup>, the Plan will provide a model from which to prioritize properties and to justify those worthy of identification and registration. The Plan will greatly streamline the review and compliance procedure, as well as assist local communities in identifying significant properties.

In further response to the Amendments Act of 1980, local governments will be encouraged to incorporate preservation issues into planning policy. Ten percent of the FY82 state allocation will be passed through to certified local programs. Certification of local ordinances will be strongly advocated and close liaison with local mayors, councilmen and county supervisors will be pursued.

Local governments, state and federal agencies, non-profit groups, preservation professionals, community organizations, financial and business professionals, academics and private sector groups will be targeted for preservation education programs in FY82. Funds will be expended for workshops, brochures and pamphlets. The Community Survey Coordinator will conduct educational programs in various regions throughout the state and serve as local preservation consultant. The Architectural Historian and Archaeologist will provide technical assistance and disseminate information in their fields of expertise. The Historian/Registrar and SHPO will be primarily responsible for general public awareness programs through lectures, interviews and articles. The Historical Architect will be devoted to advocating proper preservation methods and compliance with certification requirements and will conduct technical workshops, training sessions and lectures throughout the state.

The Historical Architect will be promoting protection measures throughout the state. The certifications of historic-property rehabilitations to receive federal tax incentives will be the primary means of implementing the protection of privately-owned historic buildings. Other historic properties will receive limited protection from impact by federal undertakings through the review and compliance procedure. However, there will be no subgrants awarded for acquisition and development projects. Nonetheless, subgrants and the preparation of Historic Structure Reports and pre-development plans and specifications will be awarded and encouraged to document and ensure the proper preservation of important historic properties. Further, rehabilitation/preservation projects will be supervised and promoted where possible.





## Program Overview

California recognizes that the spirit and direction of the State are founded on and reflected in its historic past. Our historic and cultural foundations must be preserved as living parts of our community life to provide the public with a sense of orientation, continuity and a genuine opportunity to appreciate and enjoy the rich heritage of the State.

California is concerned with understanding and giving recognition to all groups that participated in the life of our communities, not just the wealthiest or the most famous. The State will attempt to protect and preserve sites and districts that tell how its various citizens earned their livings, conducted their businesses, spent their time, and expressed their concerns with religion and the arts. Our Office attempts to ensure the conservation of the total environment, built and natural. We also provide protection for established neighborhoods and communities, and encourage revitalization of urban commercial districts. The State Office of Historic Preservation attempts to help citizens recognize and appreciate their cultural assets. It also offers technical and financial assistance for giving significant properties an economically viable role in contemporary life.

As a result of the State's preservation program, many major accomplishments occurred in fiscal year 1981. Cultural resources must be identified and evaluated before they can be protected and preserved. Twenty city and county surveys were funded in 1981, the most funded in any single year of the program. The new surveys included the full range of size of California communities. Three major metropolitan areas began surveys: Oakland, Los Angeles, and San Diego. The Office's survey unit studied the varied consequences of over 30 previously completed survey projects and found encouraging results. Eighty eight percent of the cities used the surveys in making local planning decisions. In 86% of the cities the surveys led to nominating structures to the National Register of Historic Places. And 77% of the cities produced publications based on the surveys. In addition, the Office's archeological inventory continued to be the most productive in the nation, recording over 5,000 additional sites through its 12 regional centers.

The Office was particularly productive with regard to registration activities during the 1981 fiscal year. One hundred and nine individual nominations passed the State Review Board as well as seven district nominations. In addition, technical comments were made on 30 federal agency nominations.

The Office's protective activities continued to be the most effective in the country with the California Environmental Protection Act offering protection under State, local, and private undertakings comparable to that of Section 106 of the National Historic Preservation Act. In fiscal year 1981, over 1300 comments were made on major construction projects and hundreds of significant properties were preserved intact through these efforts.

Grants-in-aid projects also offered protection to significant properties in the past year. Plans and specifications were developed for 13 projects rehabilitate or restore properties listed on the National Register of Historic Places. A total of 28 ongoing acquisition and development projects were monitored during the year.

In the program areas of survey, registration and protection, it was recognized that our major problems and needs related to the extent of local public involvement. In a state of the size and population of California, one small preservation office cannot handle all of the survey, registration or protection needs. About 500 cities and 58 counties need technical advice and assistance as much or more than the isolated small grants we have been able to give. There are widespread demands for technical assistance, for example, on historic building code compliance, historic tax incentives, architectural consultation, and on ways of reviewing distinctive project proposals. Local government employees and volunteers often simply need a workshop on relevant information to perform preservation activities. Indeed, many, if not most, preservation battles are already being wage on the local level where there is this need for professional advice and leadership.

In the 1982 fiscal year, we intend to shift priorities and personnel into creative activities to stimulate public involvement and more widely



disperse preservation information. We will place greater emphasis on making our state and federal dollars go farther by emphasizing community outreach and technical assistance. We will concentrate on explaining the advantages of the new federal tax legislation. By funding no new acquisition and development projects, we will free staff to work with tax legislation, community outreach, and technical assistance. Our approach will avoid major staffing needs on the state level and thus remain consistent with current state policy.

Section 201(a) of the National Historic Preservation Act Amendments of 1980 (PL 96-515) extends and clarifies State Historic Preservation Office responsibilities. The California Office will fulfill all these responsibilities and will pay particular attention to the new directions underlined by subsections E, F, G and H. We will place new attention on advising and assisting Federal and State agencies and local governments in carrying out their historic preservation responsibilities. We will help ensure that historic properties are taken into consideration at all levels of planning and development. We will provide greater public information, education, and training and technical assistance relating to the Federal and State Historic Preservation Programs. And we will give greater attention to cooperating with local governments in the development of local historic preservation programs.

The new community assistance emphasis of the California Office of Historic Preservation will not neglect important ongoing activities. Twelve regional archeological centers will be contracted with again. We will continue to process all National Register applications submitted by the public. We expect to evaluate and certify over 15 tax reform act applications. We will review and comment on the effects of over 1,000 major construction projects in the state. Also, at least 12 previously initiated acquisition and development projects will be monitored in FY 1982.













## PROGRAM OVERVIEW

President Reagan's decision to rescind the 1981 federal historic preservation grants-in-aid for Hawaii greatly hampered the Hawaii State Historic Preservation Office's efforts during the past fiscal year. As a result of the rescission, no new survey and planning or acquisition and development grants were initiated by our office, and it was only through prudent use of State funds that the Office managed to maintain its professional staff.

However, despite the lack of federal fiscal support several major undertakings were accomplished within our office. The Hawaii Historic Places Review Board's rules and regulations (see enclosed) were revised with the assistance of the State Attorney General's Office. As a result of the new rules and regulations, our office anticipates a smoother and more rapid processing of nominations by the Review Board, as nominations contested by property owners, which previously took a minimum of two to three meetings to review, should now be handled at one meeting.

A second major project of our office was the revision of the Hawaii Historic Preservation Functional Plan, a plan mandated by the Legislature to assist in the implementation of the Hawaii State Plan. The 1981 Legislature called for a streamlining of all functional plans submitted to it, and as a result our previous two years' efforts had to be consolidated and condensed. (See the enclosed Functional Plan)

A final major undertaking of our office involved the registration of the entire island of Kahoolawe as an archaeological district. Although the nomination was prepared and submitted by the United States Navy, our staff and Review Board expended numerous hours in reviewing and commenting on the entire nomination process.

Fulfillment of Federal Responsibilities

In accordance with the National Historic Preservation Act of 1966, as amended, the Hawaii State Historic Preservation Office attempted to fulfill its responsibilities as best it could in 1981 despite limited federal support. The State Historic Preservation Officer continued to direct and conduct a comprehensive statewide survey of historic properties and maintained an inventory of such properties.

During the past year, our office added over 1,570 historic/architectural properties and 583 archaeological features to our inventory. This effort primarily resulted from three sources:

1. Development projects undertaken by State and Federal agencies or private developers requiring archaeological surveys;
2. Surveys undertaken by private organizations under 1980 contracts; and
3. Survey work undertaken by the SHPO staff.

The bulk of the historic and architectural properties were surveyed by the Junior League under a contract with our office. Their project included a survey of the Manoa valley, Diamond Head, Kahala and Blackpoint residential areas. Other inventory information was generated through a grant project with the local chapter of the American Institute of Architects involving structures erected in Hawaii during the thirties, and a bridge survey for the island of Oahu which the Department of Transportation undertook. Our staff also was active in this area, inventorying the University of Hawaii campus, all the public school buildings in the State, and a majority of the County and State owned buildings in the islands.

With regards to archaeological properties, due to our limited staff and the large quantity of federal, state, county and private projects which they must review, the survey of archaeological features remains intrinsically linked with the project review process. Almost all the sites added to our inventory were located as a result of the review efforts of our staff.

The major problem confronting our office in the area of survey involves our limited staffing. Our Functional Plan highlights this problem and calls for the creation of a number of new positions, which would greatly alleviate some of the difficulties within this area, if acted upon by the Legislature.

Because of limited staffing, the State Historic Preservation Officer realizes that most of the survey operation cannot be undertaken within the office, but must be accomplished through grants or cooperative efforts with private organizations and other governmental agencies. Thus, for fiscal year 1982, we hope to award survey contracts to:

1. The Waikiki Residents Association to continue the survey of Honolulu which was started by the Historic Hawaii Foundation and continued by the Junior League. This third phase of the project will almost complete the inventory of the entire city of Honolulu, the area of most intense development in Hawaii.

2. The Hawaii Heritage Center to survey the independent mercantile stores of Honolulu. These neighborhood stores, many of which employ a frame false front style of construction, are becoming an "endangered species." Through this survey a means to evaluate and identify the buildings which should be given a high preservation priority will be determined, and such buildings will be documented for a thematic nomination. During the past year, approximately five percent of these already vanishing structures were demolished to make way for new development.
3. The Friends of Hart Wood Foundation to survey all extant buildings designed by Hart Wood in Hawaii. As one of the major architects working in Honolulu in the 1920s and 1930s, Wood was responsible for helping to create a distinctive Hawaiian style of architecture.

Also, in coordination with the State Department of Transportation, the office hopes to see the survey of the neighbor islands' bridges initiated in fiscal year 1982.

Besides the surveying of historic properties, the State Historic Preservation Officer administered the nomination of historic properties to the National Register on a limited basis due to the lack of federal rules and regulations to delineate the proper procedures for the nomination of private properties to the National Register of Historic Places. Our office submitted only three nominations to the Keeper for inclusion in the National Register in 1981, and two of these were returned as they were private properties.

As a result of the Department of the Interior's decision to not accept any private property nominations, our staff had to reorient its efforts to gather information on publically owned properties. This new survey approach has been initiated and hopefully in the forthcoming months our efforts will result in a number of nomination forms being transmitted to the Keeper. We anticipate the major thrust for our nomination effort in 1982 will revolve around the registration of publically owned buildings throughout the State.

Also, in accordance with our federal responsibilities, our office continued to service federal agencies during the past year in regards to preservation matters. We continued to attend United States Army Historic Preservation Committee meetings, and strongly encouraged the Army to develop a National Register nomination for the Palm Circle area of Fort Shafter. We worked with the U. S. Navy on Kahoolawe and also in the redesignation of buildings at Pearl Harbor, as a part of the Memorandum of Agreement signed by the Navy and the President's Advisory Council on Historic



Preservation. With the Coast Guard, we have been coordinating on their inventory of lighthouses, and assisted them in the preparation of the nomination form for Diamond Head Lighthouse. With the Department of Transportation, we have coordinated in regards to their historic bridge inventory for the island of Oahu, and of course we interacted with innumerable agencies in the review of their projects for fiscal year 1981. We anticipate continuing to interact in 1982 with the various federal agencies in Hawaii at about the same level as we did in 1981.

In an effort to fulfill our responsibility to provide public information, education and training and technical assistance relating to the Federal and State Historic Preservation Programs, our office has coordinated with our State Department of Education and have prepared a slide program on historic preservation, which we hope will be used in the near future in our public school system. Our staff also has given lectures and slide presentations to various organizations throughout the state and to various private school classes. Our historic architect continues to provide information on the Secretary of the Interior's Standards for Historic Preservation Projects, and we distribute all materials generated by the Department of the Interior.

In the past year, our relations with the various counties has continued to be one of cooperation. We reviewed and commented upon the Cultural Resource Management Plan for Hawaii County and have provided technical information and guidance for a similar plan now being prepared by the City and County of Honolulu. In the coming year, we expect State-County relations to remain positive and intend to reserve ten percent of the planning estimate for local government programs, pursuant to P.L. 96-515.

The most active undertaking of our office in the past year, as in previous years, involves the protection of historic sites from proposed development projects. Our archaeological staff devoted 90 percent of their time to this effort, and our architectural and historical staff devoted approximately 15-20 percent of their time in similar activities. We anticipate comparable levels of activity in this area in 1982.

In Fiscal Year 1982, our office intends to meet its federal program needs in the areas of survey, registration and protection as we have described above. With the hope for adoption of our State Historic Preservation Plan by the Legislature, Hawaii will have a broad base from which to guide its preservation decisions in the future. Recognizing the need for the judicious use of our Islands' precious and limited resources, the State Plan and the various Functional Plans recognize the close interrelationships which exist among the various governmental programs throughout the State. Thus, our plan calls for coordination between the



State Historic Preservation Office and a variety of State agencies including those responsible for energy, transportation, housing, recreation, conservation, tourism and education.

As a State, Hawaii is unique within the nation, having no pre-dominant racial group as the majority of our resident population fall under the instruction definition of minorities, as either Pacific Islanders or Asians. The State staff is composed of two Asians, one Pacific Islander, and two Caucasians, and the SHPO is of Asian ancestry. The bulk of our activities involve interaction with the various ethnic groups which comprise our State's population. We anticipate this will continue to be the rule in Fiscal Year 1982.







## INTRODUCTION

Before examining Nevada's Historic Preservation Program, it is necessary to characterize those elements that comprise the State as an entity.

As the Nation's seventh largest state (110,540 square miles), but with a total population of less than 850,000, Nevada is unique among the fifty states. Vast areas of harsh, arid, unpopulated land harbors ghost towns, mining districts and little vegetation. These are contrasted with urban areas burgeoning from accelerated growth: meccas for gamblers, tourists and those seeking "Sun Belt" attractions. This influx resulted in a 35% growth rate in Nevada between 1975 and 1980, and a further 18% increase is expected before 1985.

Less than 15% of the land area is privately owned. The Sagebrush Rebellion was initiated in Nevada by its free-spirited, independent-minded citizens who are suspicious and resentful of Federal Government influences in their lives.

It is in this atmosphere that the Division of Historic Preservation and Archeology conducts its programs. Many successes in survey and inventory have been attained in the more populous, accessible areas in the western part of the State. However, problems develop when we attempt to focus our efforts in central and eastern Nevada.

The "boom and bust" cycle of economic activity that began in the 19th century due to mining mainly occurred in these areas of the State. Arid climate and abandonment has left a legacy of basically intact cultural resources which are interspersed between numerous prehistoric and historic archeological sites and small, often unincorporated cities and towns.

As a mandated responsibility, our office expects to continue the resource inventory process. However, the limited staff resources, physical restrictions on travel, inability of local governments and organizations to participate due to fiscal strains, and general suspicion of any Federally-sponsored programs are problems which will continue to make our task a challenge.

The remainder of the Program Overview will be separated into segments; one each for Accomplishments, Survey, Registration, and Protection. With the exception of the first, each segment will address achievements and problem areas in FY 81, and suggestions for solutions and new projects in FY 82. In addition, these elements will separate Review and Compliance Comment obligations (involving Federal agencies) from the narrative.

Pursuant to P.L. 96-515, we state that there are no certified local governments to qualify for the 10% allocation of our planning estimate.



## ACCOMPLISHMENTS

The Nevada SHPO believes that significant accomplishments were made in FY 81 that would be beneficial to other states.

The Annual Preservation Conference (S.O. #18), held in October, provided a forum for cooperation between state, federal and local preservation, historical and museological organizations. Speakers and participants from other states insured the dissemination of conference results to audiences outside of Nevada, while providing valuable insights to Nevadans about other state's preservation activities.

In FY 1981, our Division was able to exceed the projected cultural resource inventory level (GMR #3a), by over 100% in each of two categories. In addition, square miles of state archeological inventories (GMR #3b) partially mandated by MX-related compliance activities, were increased by over 600% of the projected level.

Other significant archeological accomplishments include the creation of the predictive archeological model for the Virginia City National Historic Landmark District (S.O. #22). Reconnaissance level surveys of 100% of the 29 planning zones were conducted to test the reliability of the model. Another, and perhaps more important archeological accomplishment involved the creation of the Nevada State Archeological Plan (S.O. #23). The state plan will define and describe study units in Nevada history and prehistory that will serve as guidelines for evaluating the significance of prehistoric and historic sites. The plan, already in first draft form, will be complete by December 31, 1981.

Finally, the Nevada Division is particularly proud that our level of interaction with the public has been significantly increased (GMR #5), in certain areas of the state. Results of years of persistent public information policies and nascent cooperation between governmental agencies and preservation-oriented groups has markedly raised the level of public preservation consciousness in western and southern Nevada and has begun to be more recognized in central and eastern Nevada. This is reflected in the over 100% increase in documented technical assistance requests from the public. The catholic quality of the types of requests suggests that our state program has been successful in reaching its constituency.

## SURVEY

Our Division accomplished significant increases in the survey element in FY 1981. The impact of development, mining activities, and the U.S. Air Force MX project provided a vehicle for survey initiation which involved many governmental agencies, individuals and local governments. Thus, HPF Priority #1, Problem 1 was exceeded for buildings, structures, and archeological sites by a high percentage. This unique opportunity is not likely to be available again. Stop work orders on MX related surveys and drastic reductions in BLM and Forest Service staff for FY 82 will effectively reduce the levels of future survey efforts in central and eastern Nevada.

There were no major problems in the survey element in FY 81. HPF #1, Problem 4, Objective B was not fully implemented and Problem 4, Objective C was not completed due to staff shortages.

These deficiencies will be addressed in FY 82. Inventoried properties will receive closer scrutiny in order to identify Register quality properties. In addition, all future survey agreements will include provisions for this evaluation by a professional meeting CFR 1201 standards. Attempts will be made to increase local government participation in the survey element through increased public information policies and solicitation for cooperation. It should be noted however, that even the best-intentioned local governments or organizations cannot override lack of matching funds for survey grants. To increase interaction with the central and eastern portions of the state, we will undertake to contract several intensive cultural resource inventories, and to reinstate one which was cancelled for lack of match. In addition, staff will endeavor to conduct reconnaissance-level surveys in at least four areas in the western part of the state. Also, we will undertake to survey other previously listed National Register districts which were not surveyed.

Although the MX project has ended for the time being, oil, gas and geothermal exploration, drilling and excavation continue to effect cultural resources on federal lands. For this reason, we would include the survey and inventory of several significant areas in FY 82 objectives that will be subjected to heavy impact within the next five years.

### REGISTRATION

Of the three program elements, registration presented the most problems to the Nevada SHPO in FY 81. While active attempts by staff have maintained an average level of Register submissions, improvements in public participation and in the efficiency of the state system were not fully implemented in FY 81.

One of the primary problems concerned understaffing. The two staff positions primarily responsible for registration activities were vacant for at least sixty-one working days, a total of approximately three calendar months. Thus, efforts to improve public participation in the registration process were slowed in FY 1981 (HPF #2, Problem 1, Objective B). Additionally, creation of the instruction manual for the Nevada State Register (S.O. #21) had to be postponed.

Staffing problems only contributed to the incompleteness of State Objective 19. The categorization requested by this objective was and is unrealistic. The task requires collation of information that can only be accomplished by a computer or through excessive staff man hours, both of which are unavailable to the Nevada SHPO.

A final, and particularly troubling problem concerns the National Register itself. The persistent lack of guidance from Washington concerning the private ownership provisions of the amendments to the National Historic Preservation Act of 1966 is incomprehensible. Although our registration program is small, the delays caused by this problem have created embarrassing situations involving

our interaction with preservation organizations and individuals. No one understands the delays in implementing this provision and the continuing silence from Washington does not improve the situation. Nominations cannot be forwarded to Washington from the state level and individuals are hardly encouraged by our "we don't know" attitudes to participate in the program. Additionally, these delays contribute to difficulties in implementing Certifications of Significance and Certification of Rehabilitation.

This Division also has had problems with increasing the registration of significant properties on public land (Problem 1, Objective A). Eighty-seven percent of Nevada land is managed by the Federal Government and much of this land is unsurveyed and uninventoried. Most archeological investigations, when they take place, are in response to Section 106. Federal agency archeologists usually go no further than making certain that significant sites are either avoided or minimally impacted by projects. Eligible properties are not often nominated to the Register because federal agencies claim they have neither the time nor personnel to prepare nominations.

In FY 82, the Nevada SHPO will attempt to remedy the problems and deficiencies in our registration program. Development of the instruction manual for completing Nevada's inventory forms will be finished. More aggressive public information programs will be undertaken in order to increase participation in the National and State Register programs. This objective will be augmented by the creation of public relations materials for distribution concerning the State and National Register programs. Additionally, this office will revise and update National Register instruction materials in order to insure consistent quality in the completed document.

In order to proceed with the National Register nomination process of private properties, this Division will, in a manner employed by other states, seek owner consent and proceed with Advisory Board reviews of nominations.

Another task for the coming fiscal year is to more actively encourage federal agencies and their contractors to review eligible properties and prepare nominations. In particular, we plan to concentrate our efforts on federal agencies such as the U.S. Forest Service which employs archeologists, but has failed to make a single nomination in Nevada. Unfortunately, federal agencies will have smaller staffs and budgets in FY 82 and will have difficulty complying with Section 106. In turn, this will leave less time to prepare nominations.

We will continue to encourage individual nominations and to participate in subgrants that will result in district, thematic, or multiple resource nominations. In addition, we expect to prepare at least one National Landmark nomination for an archeological site.



PROTECTION

The protection element of our FY 1981 program was successful. GMR goals pertaining to protection were consistently met if not exceeded. Participation in four FY 1981 rehabilitation/restoration projects also exceeded the HPF Priority #1 (Problem 3, Objective A). Public interest in protection programs continued. HPF Priority #2 (Problem 1, Objective C, Method 1) was successful as over eighteen potential A&D projects were identified through public requests.

Problems relating to this program aspect were also evident in FY 1981. Already mentioned, staffing shortages prevented extensive review of the large amounts of inventoried properties for potential A&D projects or Tax Act applicants (HPF #1, Problem 1, Objective A; Problem 4, Objectives B and D). Additionally, Tax Act Certification goals (GMR #9, HPF #1, Problem 3, Objective C) were not met, although the number of comments on Certification for Rehabilitation increased from FY 1980. Active solicitations of pre-applications for A&D projects and planning grants became a problem when the funding future of the entire State program came into question. Public demand for these monies however, remained constant.

In order to satisfy the current administration's desire for increased private sector participation, our Division will attempt to offset diminished pass-through participating monies by establishing a public relations format for business organizations and individuals around the provisions of the Economic Recovery Tax Act of 1981. Although limited in the amount of travel that can be undertaken by the staff, we will attempt to disseminate this information and create a healthy rehabilitation atmosphere throughout the State, thereby diminishing the potential negative effects which would be caused by any reduction in sub-grant funding levels for FY 1982. Requests for information and applications have already increased since fact sheets from Washington have been released. Better review of historic inventories will be undertaken for potential Tax Act applicants and small planning grants will be initiated if the new S&P match ratios can be met by applicants.

In addition, four A& D projects from FY 1980 (Westside School, Newlands House, Alamo Ranch, V&T Engines) and four from FY 1981 (St. Paul's Church, Carson City Brewery, Brown Hotel, Gold Hill Depot) will be monitored to insure compliance with the Secretary of the Interior's Standards for Historic Preservation projects.

As a result of the increase in mining, geothermal, oil and MX activities on federally managed lands, this Division has spent a large amount of time monitoring Section 106 activities of federal and state agencies. During FY 1981, the BLM, with very few exceptions, was in compliance. The Toiyabe National Forest and the Nevada Department of Transportation have actually improved their performances over previous years by the more timely submission of cultural resources reports and more careful monitoring of projects that might effect significant sites. On the other hand, federal agencies such as the Humboldt National Forest and the Department of Housing and Urban Development have a poor compliance history and do not adequately identify and protect significant sites, which is also a problem of survey.

In addition to these problems, our office also had to oversee the activities of the Air Force and its consultants on the MX project. Over forty percent of the staff Archeologist's time was spent on the project: submitting comments, reviewing the consultants' reports and most of all, insuring the compliance of federal laws and regulations regarding historic preservation. The Air Force signed a PMOA but the State of Nevada did not. We feel that the Air Force did not fully understand its obligations to the State as we had to spend a good deal of time explaining legalities to the USAF staff. Monitoring contractors' activities was an especially difficult task considering the size of our staff and the scope of the project: we received no MX money to aid us in any way.

Although the MX project has ended for now, compliance problems will continue in FY 1982. The Nevada State Planning Office (Clearinghouse), the BLM and the U.S. Forest Service have all received substantial cuts in budget and staff which will make it more difficult to monitor federally funded or permitted projects, or projects involving federal lands. We have targeted the U.S. Forest Service (HPF Priority 3, Problem 3) as a critical agency to assist in resolving compliance problems. The BLM and Clearinghouse have established procedures for dealing with compliance, but some of their guidelines must be altered in consultation with this office to deal with new budget constraints. Compliance problems with HUD will not be solved at the State level because regional representatives claim to be following Department guidelines established in Washington, D.C. We will continue to be frustrated in our efforts to seek compliance from HUD until this problems is solved.











## PROGRAM OVERVIEW

Introduction

This brief overview of the Trust Territory Historic Preservation Program provides a short review of past accomplishments and prospective statements on two of the Historic Preservation Fund's three main areas of concern: survey and protection; the third, registration, has been defined as without the concern of the Trust Territory Historic Preservation Program. These two major sections are preceded by a short description highlighting major accomplishments of the previous year.

FY 1981 Accomplishments

- 1. During FY 1981, a number of major survey and planning projects were completed. For a complete listing of completed projects, please see Appendix A.
- 2. The Historic Preservation Office successfully moved to another phase of its education and information program with the establishment of the Micronesian Archeological Survey report series. By the end of FY 1981, five reports were published, with several more awaiting printing or in the last stages of editing. Considerable demands for the series have been experienced and most numbers were finding wide distribution throughout the US and Pacific. Details of the report series are provided in Appendix B.
- 3. A further highlight of the concluding year was the successful prosecution of the Section 106 case with the Advisory Council on Historic Preservation and the U.S. Department of the Interior. It is expected that this action will give the Historic Preservation Programs in the new governments time to mature and stand on their own feet in the anticipated difficult times after transition from the trusteeship agreement. The Advisory Council's comments and recommendations appear as Appendix C.

## PART I: SURVEY

1. Introduction

Because systematically planned site surveying did not begin in Micronesia until late 1977, only in the last few years have anything like adequate data been available from survey activities. This lack had been the source of significant compliance problems. In the development of a coherent survey program, special emphasis was given to the implementation of intensive surveys of high growth areas located around district centers; it was anticipated that, given the plans of the Trust Territory Government to create an infrastructure for the development of the region, these areas would undergo considerable development over a period of ten or twenty years. To date, major effort has been expended upon the required survey of prehistoric and historic era properties in each of these centers. These have made a major contribution to our knowledge of each area and the resulting reports have been used by planning agencies and in the implementation



of compliance criteria.

At the same time, each project has had limitations, of which the major aspects may be identified as (1) sample bias; and (2) difficulty of detail for particular planning purposes.

The difficulty caused by the latter aspect, the problem of detail insufficient for particular purposes subsequently identified by planning agencies or development projects, has meant a continuing necessity for more intensive survey and monitoring in particular areas under threat. The problem is one of scale. An intensive survey in a relatively large and highly populous district center, cannot be sufficiently intensive to include all backyards and all subsurface deposits; the identification of a more closely defined area as the site for a development project thus requires a more detailed survey of the area and systematic testing for subsurface deposits. While the intensive surveys of growth centers have provided valuable information about particular sites and predictive data about others, they have continued to be supported by more detailed investigations of particular areas as the need has arisen.

The problems associated with working in and around already developed areas--a sample biased by several factors beyond the investigator's control--have meant that the surveys of high growth areas have had significant limitations when it has come to predicting the types and range of historic properties likely to be found in other areas, despite apparent similarities of topography and other environmental and cultural variables. Consequently, it has been necessary to initiate intensive surveys of less affected areas in order to sample more adequately the range of historic properties likely to be manifest in the Trust Territory; it was anticipated that these systematic surveys would have greater predictive value for the remainder of the Micronesian environments.

By the end of FY 1981, intensive surveys of non-high growth areas had sampled a range of physical and environmental variations, and concurrently covered several sociological variables in some but not all districts; one major and two minor research projects were underway in Palau; two projects in Yap were designed to cover high and low island situations; several shorter and continuing projects had begun to provide an adequate sample of Ponape Island and a complete coverage of one of the outlying (culturally distinct) atolls was gained; two mitigative projects had reported upon different foci within the Marshall Islands. In all projects with a prehistoric focus, the scope of work had insisted upon an orientation toward a minimum region--for example, a traditional village land use area as well as coverage of a range of microenvironmental zones; the opportunity in most to conduct limited test excavations allowed some understanding to be gained of temporal variations as well as testing similarities in site use and settlement and subsistence patterning. A varied range of research orientations was encouraged to maximize information retrieval. The information from these studies has provided, and will provide as further results become available, a considerable source of site inventory and site predictive information.

#### B. Identification of Problems and Needs

The main problems manifest from the survey program so far are firstly, range of coverage and, secondly, the variable nature of sites in each area. The major needs are for greater coverage and further careful selection of survey areas. Some figures will put this into perspective. While the intensive surveys of high growth areas have on occasions exceeded a ten percent coverage within the target

district, the actual areal coverage of the non-growth intensive surveys has totalled at present less than one percent of any district. No doubt, this factor has bearing on the second aspect. While the results of the surveys have been useful as a basis for predictive studies, these have been made at a relatively general level. Clearly, the need is for further detailed survey work. At the same time, some districts have received more attention than others. Little work has been done in either Truk or Kosrae, for example, both exhibiting situations different from other areas of Micronesia. Again, there has been a tendency for efforts to be concentrated in and around major island groups; outlying islands require more attention.

In arriving at such considerations, however, one must not lose sight of the continuing needs prompted by the proposed activities of development agencies. For the ongoing Capital Improvement Program (CIP) and similar programs, a continuation of the closely focused surveys used in previous years will be necessary. In implementing these the earlier completed major district center survey projects and the predictive models derived from the other major archaeological and historical surveys will be useful. Coordination of the district survey teams will be necessary to provide first-order information, while central staff and outside contractors might be required where major concentrations of historic properties are involved or where mitigation activities are necessary.

It cannot be anticipated, moreover, that the loci of development activities will continue to be in the district centers. As more responsibilities are taken over by the new governments and their leaders react to local pressures for a wider share of development resources, attention will, increasingly, move to outlying districts and islands. The need will then be two-fold: Firstly, for a broader sample of properties beyond the district center with which to evaluate and improve presently existing predictive models and prompt, detailed studies in impact areas. Secondly, for more resources to be available for mobilization of local survey teams and central office staff to reach and work in relatively isolated areas.

During recent analysis of excavated materials, some researchers have pointed to difficulties experienced in gaining information concerning colonial-era historic materials; similarly, it has become clear that little is known of the policies of the various early colonial administrations and their implementation in both district centers and outlying areas. This applies especially to the Japanese civilian and military involvement. In both the cases of historic artifact identification and colonial government action, these areas of ignorance have significantly hindered the progress of research and project planning and they would appear to be viable topics for investigations as part of this office's Tools for Survey and Planning Program.

### C. Planned Solutions to identified Problems

In order to address problems identified in the previous section, the HPO has developed the following objectives to be supported with specific activities. These include:

1. To modify the survey program to have two primary foci: (1) obtaining a greater areal coverage and hence sample size of prehistoric and historic era places in order to produce a better basis for predictive site distribution models; and (2) obtaining a greater proportion of the requisite areal coverage away from developed areas in order to gain a less biased sample of

historic properties. This will be accomplished by the following actions:

- a. Initiating a prehistoric, intensive level archaeological survey of a high island in Truk Lagoon.
- b. Initiating reconnaissance level surveys of several outer islands in Truk State.
- c. Initiating an intensive level survey of sections of Kosrae Island.
- d. Initiate reconnaissance level surveys of non-Polynesian outer islands in Ponape State.
- e. Initiate intensive archaeological surveys of central areas of Palau (i.e. outside Koror)
- f. Initiate historic era survey of Colonia, Yap State.
- g. Initiate historic era survey of Dublon Island, Truk State.
- h. Initiate historic era survey of Jaluit Atoll, Marshall Islands.
- i. Initiate survey of Japanese World War II era military installations at an outlying district subcenter.

2. To take steps necessary to respond to the increasing and changing needs of problem oriented survey necessary in the face of development projects. In order to accomplish this the following actions will be taken:

- a. Local survey teams will be rebuilt in a more trim and mobile fashion.
- b. Additional technical training will be provided by the Central office and will be designed to increase the capacity of the survey teams and coordinators.
- c. Alternative sources of funding will be pursued to support the local historic preservation offices so that FY 1982 funds can be allocated more directly for survey research.
- d. The Historic Preservation Specialist (a citizen of Kosrae), recently returned from a training program at the University of Hawaii, will be delegated to concentrate his attention upon liaison with and training of local survey teams; he will spend a significant proportion of his time in the field. In order to minimize the use of program funds for this aspect of his duties, we will follow up a suggestion that we liaise with the OICC, Navy with regard to intra-TT transportation.
- e. Wherever appropriate, the possibility will be pursued of professional survey teams being used to do impact mitigation work in conjunction with contracted pure research-oriented surveys. This approach has had some degree of success, as in the case of recent work in Palau which resulted in high quality applied research, and will be able to be implemented elsewhere.

3. To provide increased technical assistance to researchers conducting fieldwork in Micronesia through the expansion of the Tools for Survey and Planning Program. In order to accomplish this the following actions will be taken:

- a. Initiate a study of colonial-era artifactual materials concentrating upon those items which could be expected to survive in archaeological deposits, especially ceramics and some form of metal tools and implements.



- b. Initiate reveiws of the history of colonial administrations in Micronesia with particular attention to their policies with regard to land-use management and their implementation in particular areas.
- c. To continue obtaining translations --and arranging their publications where practicable--of early historical manuscripts, articles and books.

## PART II: REGISTRATION

### A. Introduction

Since 1977, it has been the policy of the Trust Territory Historic Preservation Office to de-emphasize the process of nomination of historic properties to the National Register simply because, with the termination of the U.S. administration, that registration proceeedures would become meaningless. Instead, local recording and registration proceeedures have been emphasized with the development of inventories of archaeological sites and historic places being held and maintained in the central and local offices. Site maps detailing localities are made and files outlining discriptions, developing arguments for significance and providing reference to sources of further information are held.

At the same time, it has been necessary to nominate some properties in order to be able to make use of Acquisition and Development grant funds. Further, the procedures of determining properties eligible for the National Register are routinely used in matters dealing with compliance.

## PART III: PROTECTION

### A. Introduction

Since the early stages of the program in the Trust Territory when coordination between the HPO and critical planning agencies was minimal, considerable progress has been made in several areas. Planning offices and their agencies within both the Trust Territory Government and the various districts have been identified, their interest in the objectives of the program have been elicited and their responsibilities toward historic properties have been identified. Confusion over responsibilities and regulations has been largely overcome. In cooperation with planning agencies, areas at risk from development projects have been identified; these have mostly been focused upon district centers and the seats of administration of the new governments of Micronesia. Data from survey reports have been collated and, where necessary, quickly been available as the basis for comments upon development strategies. The survey teams, located in each of the district centers, provided a mechanism by which basic surveys could be accomplished quickly and cost-effectively as required.

Toward the end of FY 1981, the HPO had established working relationships with critical planning agencies and was being seen to be able to quickly identify potential problems in the face of development, to suggest ways of avoiding or mitigating the effects of development and to monitor and oversee such plans. The cost of this however, has been high, since the HPO still carries almost the totality of compliance responsibilities by organizing, funding and overseeing each survey, reporting on determinations of eligibility, consulting with NPS and the Advisory Council and monitoring all development projects in the field. At times, the protection aspect

Trust Territory  
of a full-time occupation; indeed it would be possible to occupy a staff member full-time with this task.

While, within these activities some problems of poor communication, understanding and attempted avoidance of responsibilities remained, others of a different order are developing or can be anticipated.

As new agencies develop with the devolution of central (TTHQ) responsibilities to the new government of Micronesia, a new round of identification of critical planning agencies must begin; they must be informed of the objectives of the Historic Preservation Program and their interest and cooperation gained.

Emphasis on different aspects of development is being placed by the new governments; as they address the problems of political reality of their constituencies, the focus of development is beginning to move away from district centers to each small island and district municipality. Thus the focus of development projects will become diffuse and, while less money will be available for each, the potential for destruction of historic properties may well be greater than was the case when projects were concentrated in the areas of major settlement. Little survey data are available for outlying areas.

At the same time, the perspective of local leaders is somewhat more blinkered than that of the technocrats of the almost defunct HQ administration (whatever our complaints in the past) with the consequence that apparently popular "development" projects are not being matched with financial support for conservation and protection measures. Thus, while protective legislation has been passed or is before the legislatures of each of the new governments, few have moved to appropriate funds to allow the implementation of their own laws. Consequently, the survey teams carefully nurtured over the last five years, have had, or will have to be disbanded. The loss of these most essential links in the chain of historic preservation review/protection will cause considerable difficulty in maintaining the earlier achieved levels of communication, cooperation and effectiveness in protection of historic properties throughout the Trust Territory.

#### B. Identification of Problems and Needs

While continuing to guide and assist critical planning agencies as in previous years, it will be necessary to focus attention more closely upon those sections of the new governments concerned with development. This will require identification of such agencies (in some cases not clearly labelled or defined in the developing administrations), the initiation of discussion and the elicitation of cooperation; given the apparently amorphous and fluid nature of the structure and staffing situations in many of these new governments, this will be a difficult, continuing and expensive task.

It will be necessary to persuade officials concerned with development planning in the new governments to formalize arrangements by which sufficient advance warning of projects can be gained especially where outlying areas are involved--so that survey needs can be identified and planned with the problem of cost-effectiveness in mind. Distances and other logistical factors, and hence costs, will be greater and more problematic than in the past.

It will be necessary to give priority to finding the means to retain and reform the survey teams in each district so that survey investigation projects and construction monitoring can be accomplished effectively. At the same time, careful consideration will have to be given to the potential role of outside and academic



research in the survey and mitigation planning process.

It will be necessary to check, update and upgrade local site registers; these registers have already been recognized as an important resource by some planners and leaders of the new governments.

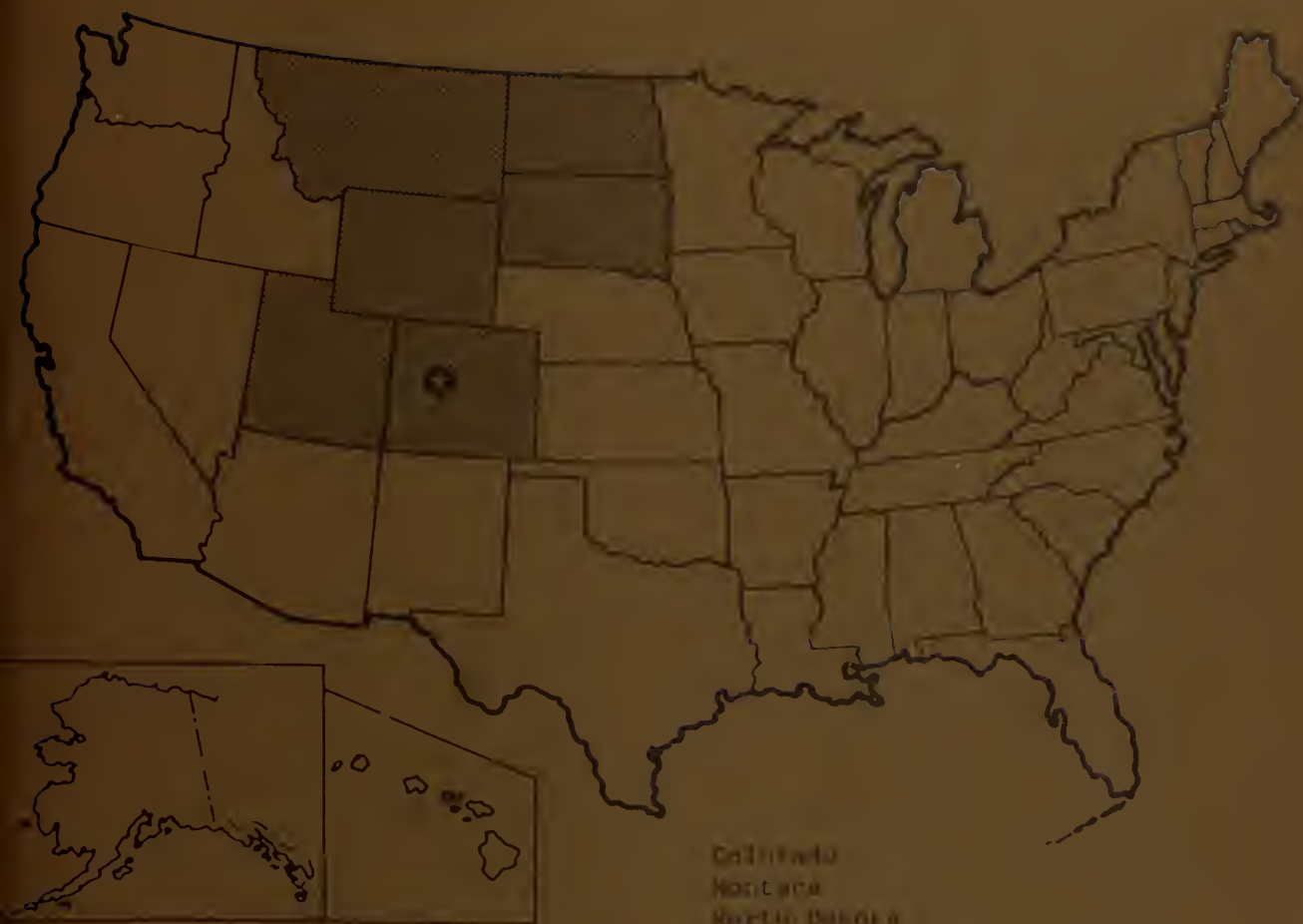
### C. Planned Solutions to Identified Problems

In order to address the problems identified in the previous section, the HPO has developed the following objectives to be supported with specific activities. These include:

1. To identify, establish dialog with and assist critical planning agencies operating in the new governments of Micronesia. This will be accomplished in the following manner:
  - a. Assign staff to concentrate on compliance review matters in conjunction with local survey teams (see Survey 2d).
  - b. Assign staff to conduct periodic meetings with government officials to explain historic preservation responsibilities and to elicit their support.
  - c. Liase with traditional authorities to elicit their support for the program.
  - d. Assign state Historic Preservation Coordinators to liase closely with the executive arm of their respective governments, emphasizing the objectives of the program and stressing the importance of the enactment of supporting legislation.
  - e. Assign staff to assist in developing regulations designed to protect important historic and cultural properties, and to have them incorporated into the established planning process.
2. To upgrade our local historic preservation offices' ability to effectively deal with compliance review. This will be accomplished in the following manner:
  - a. Assign staff to conduct a series of workshops with local office staff to upgrade their professional abilities.
  - b. Have staff provide additional training for archaeological survey teams which will allow them to respond in a more efficient and professional manner.
  - c. Have staff assist local coordinators in checking and updating already existing site registers and mapped place locations, and to establish new registers where necessary.
3. To seek alternate funding sources and use of resources to support protective measures. This will be accomplished by the following actions:
  - a. Assist local offices in drafting appropriation bills to support historic preservation activities.
  - b. Muster support for the Section 106 comments and recommendations recently adopted by the Advisory Council. (See Appendix C)
  - c. Investigate sources of non-U.S. funding which could be utilized for support of the program.

- d. Investigate ways to integrate historic preservation activities into other existing programs thus utilizing other sources of local government funding to good advantage (e.g. tourism, education, alternate energy development)
- e. Request of non-funded researchers wishing to do work in Micronesia, to direct their research to more problem-oriented goals.

# Rocky Mountain Region



California  
Nevada  
North Dakota  
South Dakota  
Utah  
Wyoming









## MAJOR ACCOMPLISHMENTS

Preservation Network Idea: An exhaustive analysis during FY 81 (see below) of a list of "preservation partners" involved in the "preservation network" drawn up in FY 1980 convinced the Colorado Preservation Office (CPO) that preservation would be most effectively carried out if all of the respective roles of the partners were seen in conjunction with one another and the CPO role was fashioned relative to them. This idea, a partial outgrowth of the RP3 process, has changed the way in which the CPO perceives how preservation takes place and how it perceives itself in the process. During FY 82, while the survey, registration, and protection elements will remain the same, how they will be administered in conjunction with the network will begin to reflect this network idea.

Preservation Network Analysis: The National Historic Preservation Act Amendments of 1980 (PL 96-515) strongly emphasize the cooperative and participatory nature of the national program and also the State's key coordination role in it. Toward that end, the FY 1982 annual application resulted from an exhaustive assessment of the Act, the preservation participants, and the State's role in that relation.

To begin, all principal participants having roles to play in preservation were identified. They numbered 381 as follows: 29 federal agencies, 25 state agencies, 13 regional agencies, 327 local government agencies, 17 national organizations, 8 regional organizations, 3 state organizations, and 6 local organizations; in addition, the private sector, the public at large, and the new public-private partnership were also evaluated.

This "preservation network" was evaluated with respect to:

- (1) nature of involvement (peripheral or central);
- (2) type of involvement (optional or mandated)
- (3) level of involvement (low or high)
- (4) level of effectiveness (low or high)
- (5) nature of functions exercised (survey, registration, and/or protection)
- (6) network coordination (SHPO lead, other lead, mutual)
- (7) support offered (technical, funding, public)

After the "preservation network" had been fully analyzed, the "preservation environment" was likewise evaluated. Environmental elements were identified as those factors that impinge in some way, beneficially or negatively, upon the preservation of cultural resources. They were identified and grouped as follows:

<u>Environmental Elements</u>	<u>Factors Analyzed</u>
(1) Expectations - 63	
(a) Colorado Historical Society	18
(b) Preservation Network	45
(2) Threats - 83	
(a) Natural	11
(b) Economic	14
(c) Demographic	4
(d) Social	24
(e) Political	14
(f) Technological	13
(g) Legal/Administrative	3
(3) Opportunities - 50	
(a) Natural	4
(b) Economic	8

- (c) Demographic 3
- (d) Social 12
- (e) Political 11
- (f) Technological 6
- (g) Information 6
- (4) Weaknesses - 68
- (a) Colorado Preservation Office 25
- (b) Federal Government Agencies 9
- (c) State Government Agencies 7
- (d) Local Government Agencies 6
- (e) National Organizations 4
- (f) State Organizations 6
- (g) Local Organizations 7
- (h) Private Sector 4
- (5) Strengths - 51
- (a) Colorado Preservation Office 15
- (b) Federal Government Agencies 9
- (c) State Government Agencies 3
- (d) Local Government Agencies 4
- (e) National Organizations 3
- (f) State Organizations 3
- (g) Regional Organizations 1
- (h) Local Organizations 6
- (i) Private Sector 4
- (j) The Public 3

These 315 environmental elements were analyzed in terms of 27 preservation roles as follows:

(1) Colorado Preservation Office Administration

- (a) People Focus
  - leader
  - organizer
  - educator
  - regulator
- (b) Information Focus
  - collector
  - producer
  - manager
  - communicator
- (c) Resources Focus
  - evaluator

- (2) Preservation Network Members Administration
  - federal government administration
  - \*National Park Service
  - \*Advisory Council on Historic Preservation
  - \*all other federal agencies
  - state government agencies
  - local government agencies
  - national organizations
  - \*National Trust for Historic Preservation
  - \*all other national organizations
  - state organizations
  - local organizations
  - cultural resources management consultants
  - universities
  - private sector
  - \*corporate
  - \*individual
  - public-private partnership
  - the public

At the conclusion of the analysis, the Colorado Preservation Officer was in a better position to determine:

- (1) the Colorado Preservation Office's various roles vis-a-vis the various network membership roles and the effectiveness of the respective roles relative to the investment of time, money, and other resources.

Having made those evaluations, the Colorado Preservation Office preservation roles were determined as follows:

(1) People Focus

- (a) leader: the CPO exercise an effective leadership role provided it is done so skillfully and in consort with the network expectations.
- (b) organizer: helping to organize and coordinate network efforts is a particularly good opportunity for the CPO. It is legally, administratively, and financially well positioned to do so; its potential for effectiveness is very high.



(c) educator: because the staff is well trained, the CPO is able to help others in the preservation network to carry out their respective objectives, thereby multiplying competent preservation work. The cost-benefits are especially advantageous.

(d) regulator: while the CPO fully participates in the regulatory process, the preservation returns are uneven -- very high in some areas (archaeology in particular) and low in others. Where possible (local government certifications, etc), some of these responsibilities should be delegated when legally and administratively permitted.

?) Information Focus

(a) collector: the CPO is especially well suited and legally, administratively, and financially to collect information (survey, registration, and technical). The CPO should strengthen its collection role.

(b) producer: the CPO has been a producer of certain kinds of information: survey methods and standards; design guidelines, some technical information; however, others in the network are better able to absorb this role; the CPO is not well positioned administratively or financially able to produce information and therefore should complete works in progress and then reduce activity in this sphere.

(c) manager: it is incumbent upon the CPO to manage well all of the information that is being painstakingly and expensively collected for its own use and also for the use of others in the preservation network so that preservation decisions can be made soundly and efficiently. This area should be strengthened.

(d) communicator: the CPO is well positioned to communicate information about the network to the various network participants for a generally synergistic effect. Its Preservation On-Line, a monthly publication already going to all of the preservation network membership, should be opened for mutual communication.

Resources Protection Planning Progress (RP3) Project: The CPO was a recipient of a grant award from the National Park Service to develop an RP3 process in two areas of Colorado: an urban area (Pueblo) and energy impact area (Rio Blanco County). The project has been completed, and unlike several other states' projects, the Colorado process emphasized the decision making process over the development of a cultural context. In particular, it tried to make simple an explanation of the decision making processes and also a comprehension and appreciation of cultural resources for the purpose of integrating these resources in the decision making process. The process itself will be tested in the two management units during FY 82.

Main Street Project Coordination: While 5 other states are cooperating with the National Trust for Historic Preservation in the administration of the Main Street projects, Colorado has made special efforts to address the very complex legal, social, economic, aesthetic, and historical issues that affect commercial properties along main streets which also compose key historic fabric in a town. Toward that end, it has coordinated very closely with the Colorado Department of Local Affairs, Division of Commerce and Development (which has or can get expertise regarding a variety of financial and economic programs of use to the Main Street towns) and the University of Colorado, School of Environmental Design's community development division which has developed a unique self-help program through which both the Department of Local Affairs and the CPO is assisting the towns; in addition, the university is offering architectural services

to selected Main Street towns. And, finally, the CPO is coordinating its design funding projects (funded by a foundation and the National Trust for Historic Preservation) with these other two partners. This system is now being expended to energy development impacted towns (see below).

Energy Impact Assistance Coordination: Using the Main Street process as a model for providing technical assistance and funds to local Colorado communities, the CPO, in conjunction with the Colorado Department of Local Affairs and the University of Colorado is seeking to expand the process to at least three towns located in areas to be affected by energy resource development. This, we believe, is a way through which to provide comprehensive, non-duplicating but needed assistance to local communities which still leaves the local communities in control of the level and type of assistance desired and will also serve as a model for use in the certification of local governments with respect to section 201 (c) (1) of the National Historic Preservation Act Amendments of 1980 inasmuch as the assistance is comprehensive and addresses most of the issues impinging upon preservation either directly or indirectly and brings to bear assistance whether it is available from the CPO or from some other agency.

Comprehensive Automated Data Base: Because the CPO perceives itself as a member of a preservation network rather than its head, it is imperative that it perform its "coordination" and "information collection/management" roles upon which the network depends. Toward that end, the CPO is developing a comprehensive automated data system in conjunction with its users -- the network partners. Similar to the RP3 project in which a variety of federal, state, local government, and private sector representatives were invited to participate in the development of the process, representatives of the network partners identified above will be invited to help design the system.

More important than just having a comprehensive data base, it is believed that design participation will lead to greater use of the information contained for the purposes intended.

Based upon the network analysis above described and also the information gained during the Resources Protection Planning Process (RP3) project and assuming full FY 82 funding, including FY 81 carryovers and FY 82 planning figure funding, the FY 82 annual program in Colorado is viewed as follows:

#### SURVEY PROGRAM ELEMENT

Energy Development Issue: energy development (coal, oil, and shale) constitutes a large threat to archaeological and historical resources; with respect to archaeological, there will be direct impacts; with regard to historical, indirect impacts occurring primarily to adjacent towns. During FY 82, the CPO will counter energy development impacts on archaeological resources principally through the collection of data required by 36 CFR 800 which will save information about the resources where the resources themselves cannot be preserved. In addition, the CPO will work with the Colorado Department of Local Affairs and the University of Colorado College of Environmental Design toward the protection of three west slope Colorado towns which work will commence with historical surveys of the areas to be impacted.

Survey Data Upgrading: the CPO has been engaged in surveys since 1973; however, it was not until 1979 that a survey format which meshed archaeology, architecture, and history was developed. Some 14 counties, which constitute areas of the state experiencing the greatest urban growth, have been extensively surveyed, albeit not at the intensive level; the lack of full information upon which to base sound management decisions is lacking in some 2200 recorded resources. In order to bring the information about the historical and architectural resources up to the intensive level, they will be upgraded.



Certified Survey Efforts: The CPO intends to prepare to certify those local governments which meet the requirements of Section 201 (c)(1) of the Act. Toward that end, with respect to the Survey Program Element, the CPO will establish archaeological report and survey standards (those for history and architecture have been completed) and the recording format for all cultural resources has also been completed)

Automated Data Base Upgrading Input: The CPO initiated an automated data storage and retrieval system in 1978; it is inadequate for the projected cultural resource management, research, and compliance functions. In cooperation with the network users (government agencies, organizations, consultants, contractors, universities, etc.), the entire system will be evaluated and revised. The analysis will be carried out in conjunction with the San Juan Basin Automated Data Base project being conducted with the National Park Service. This latter system has 20 potential variables as opposed to 10 for the CPO system and hence offers greater insight into potential manipulation of the information for research, management, and compliance purposes.

Automated Data Base Expansion: The CPO intends to develop the central cultural resources automated data base in Colorado for use by all members of the network for their needs. Toward that end, information abstracted from the 6 page intensive survey form will be entered into the automated data base for 2400 sites. In addition, 3800 sites will be entered into the San Juan Basin Automated Data Base in cooperation with the National Park Service.

#### REGISTRATION PROGRAM ELEMENT

Lack of Regulations: Since the effective suspension of the registration program in December, 1980 due to the lack of implementing regulations it is difficult to know which difficulties will have to be surmounted

to register structures and particularly districts. While district nominations of the various types are preferable to individual nominations, both from a cost-effect and protection standpoint, the CPO is reluctant to project the development of district nominations without knowing what concurrences will be necessary.

Certified Registration: The CPO intends to prepare to certify those local governments that meet, or can be brought up to a standard to meet, the requirements of Section 201 (c)(1) of the Act. Toward that end, with respect to the Act, the CPO will compile the various publications which relate to the registration process (preparation of forms, review processes, notification procedures, etc.) prepared and/or published by the National Park Service, the CPO, and others for use by local governments in their nomination procedures.

Tax Act Certifications: The CPO will actively promote Tax Act related rehabilitations in Colorado. This means that structures relating to this program which have not been registered will receive priority.

Determinations of Eligibility: The number of properties being determined eligible (or ineligible) through the 36 CFR 800 procedures far outnumber those being registered. Because the automated data system can be used to assist in evaluating resources, it is important to the registration as well as survey program that the data base be upgraded to documentation suitable for the National Register.

Ordinance Certification: No cultural preservation related ordinances are known to be under consideration by local governments at this time. However, because these will likely play a key role in a local certification program, technical assistance will be offered to those local governments seeking certification and comments will be forwarded to the National Park Service regarding the language adopted.

## PROTECTION PROGRAM ELEMENT

Energy Development Impact: Energy development in Colorado's extensive oil, coal, and shale reserves will have a large impact upon cultural resources. Archaeological resources will be most directly affected and historical/architectural most indirectly. Problems associated with the affects upon archaeological resources will be subjected to federal regulations because much of the development will take place on federal land or will otherwise be subject to the federal permitting system. Therefore, rigorous adherence to the procedures will lead to the preservation of information where the preservation of the artifacts in situ cannot be obtained. However, the indirect effects to historical/architectural resources, especially those in nearby communities, is expected to be extensive and complex and is not as subject to protection through regulation. As a pilot program, the Office will be cooperating with the Colorado Department of Local Affairs, the University of Colorado College of Environmental Design to work with three towns subject to such impact in order to help avoid or mitigate the variety of interrelated impacts with a variety of interrelated solutions. It will be patterned after the Main Street processes in which these same agencies are cooperating in 5 other towns of Colorado. (see below)

Programmatic Memoranda of Agreement: the CPO will seek to implement a PMOA with the National Park Service which relieves both the federal agency and CPO of costly and time consuming project reviews. This approach will be suggested to other agencies toward more effective cultural resource management yet with adequate CPO input and oversight.

Acquisition and Development Projects: in light of funding cuts for the National Historic Preservation Act, the A & D program is being deemphasized. The collection of information and its management, the registration of properties, and preservation planning at local levels of government must take precedence over site specific A & D projects except where there is a large public benefit. Those projects presently

underway, however, will be monitored through completion.

Plans and Specifications Projects: In line with the deemphasis of A & D projects, subgrants for plans and specifications will also diminish. However, where there is a larger public benefit (conversion of the State Museum into office space with emphasis on preserving its unique (in Colorado) classical interior or where a demonstration project can be used to help developers realize how rehabilitation can take place with economic as well as better preservation results, plans and specification subgrants will be made.

Design Guidelines Critique: Some 15 local governments have architectural design control ordinances; the CPO is working in 5 Main Street towns in cooperation with the National Trust for Historic Preservation. Each of these towns is using to some degree the publication Good Neighbors: Building Next to History. The CPO intends to evaluate how well they work in conjunction with two local governments so that workshops conducted by the CPO can emphasize the strengths of the guidelines and suggest ways to strengthen weaknesses and correct problems.

Main Street Administration: The National Trust sponsored Main Street projects are well underway in 5 Colorado towns. The CPO is committed to working with the Trust and also with the Colorado Department of Local Affairs and University of Colorado School of Environmental Design. In addition to the expertise of each of these participants, the CPO, in conjunction with the Trust and a local foundation have made funding available for Main Street storefront commercial projects. It is expected that the knowledge gained will be transferable to many other towns in Colorado upon conclusion of the project in 1983.

Handicapped Access: The CPO reviews and comments upon a variety of projects which affect cultural properties and handicapped access, usually in inverse proportion. To ascertain how access can be maximized without damaging affects to historic buildings, the CPO will convene a



workshop (the first was held in FY 1981) to discuss both general policies and specific projects with handicapped persons and organizations administering handicapped programs.

Archaeological Mitigation: Archaeological surveys conducted in accordance with 36 CFR 800 requirements are ordinarily quite satisfactory; cultural resource contractors and consultants as well as agencies have had considerable experience in conducting surveys and identifying artifacts. However there is considerable disagreement as to which artifacts are important, what finds are redundant, what information contributes to further understanding, and which preservation treatments are most appropriate. The CPO will initiate efforts, in conjunction with agencies and consultants, to identify these areas and to reconcile them in conjunction with RP3 findings and a Colorado Conference of Professional Archaeologists research design project.

Amateur Archaeologists Certification: Vandalism and commercial pot hunting are two of the most serious and damaging activities to the preservation of archaeological remains; destruction subject to regulation at least preserves the information -- and even the artifacts although they exist no longer in situ. However, vandalism and collecting leave nothing redeeming. The amateur archaeological certification program is aimed at two objectives: responsible surveying projects and the collection of data (sites recording and/or testing) in anticipation of potential vandalism or pot-hunting in vulnerable areas. During FY 82, two additional courses will be developed to add to those already developed, and 5 courses will be taught to Colorado Archaeology Society members at locations through out the state.

Previous paragraphs of this overview have touched on technical assistance which will be provided to local governments toward their certification. Specific objectives with respect to the program must await promulgation of the regulations by the NPS. However, 10% of the planning figure (a total of \$37,730) has been withheld from this application as instructed by the National Park Service in an August 12, 1981 letter (Rogers to Townsend).









Montana

FY82 Application

PROGRAM OVERVIEW

Accomplishments during FY81

The Preservation Office assisted in the completion and wrap-up of the Montana Bridge inventory. The inventory, targeted to bridges over 45 years in age and 20 feet in length, recorded over 400 structures. In consultation with the Department of Highways and an interdisciplinary committee of historians and engineers, 80 bridges were identified as eligible for the National Register on the basis of information known to date. The importance and usefulness of the inventory can be measured by the fact that we reviewed 10 Section 106 cases for bridge replacement or repair within the year; four of which were within the eligible category.

The Preservation Office significantly increased, as we intended to do with FY81 HPF Priority #2, our education, information, technical assistance and encouragement activities. We continue to believe that generating enthusiasm about historic properties, broadening perceptions of what is important, and giving people commonsense information on sound ways to treat older buildings is our most critical step in creating public support for preservation. Our accomplishments within this year included:

- publishing a quarterly newsletter supplement of four (and in one issue, eight) pages on preservation for inclusion in the Montana Historical Society's long-standing newsletter. In addition to mailing that supplement to the Society's membership list of 9,000, we funded the mailing of our supplement alone to Montana architects, planners, and city and county officials.
- preparing a slide show illustrating sensitive and insensitive remodeling or weatherization techniques used in older homes. It is geared specifically for community development officials managing HUD low income loan program funds.
- preparing a leaflet on how to research and record individual historic property, for property owners interested in nominating their property to the National Register.
- preparing three different specialized handouts for professional groups in the State whose work affects preservation: accountants, realtors, and engineers and architects. The information has been either mass mailed, or in the case of realtors and engineers, provided for use in State conference packets.
- presenting a class for children on archeological sites. It consisted of six segments and ran through the summer.
- preparing and presenting at least 20 programs within the year on the purposes of preservation, our office's work, architectural styles, etc. We have tried to tailor each to the age group, political circumstances, needs of the audience.
- presenting workshops to teachers in four different Montana communities on using buildings in the teaching of history.

Montana  
Program Overview

Although it does not follow precisely the patterns of the Resource Protection Planning model or actual segments of a revised State Plan, we can measure the effect of our consistent insistence on the potential eligibility of tipi rings, homestead structures, and mine remnants. Those are resources we identified a year ago as especially vulnerable in compliance work and consistently underrated as important to the State. To counteract that situation, we have written very explicit evaluations of significance and ideas for inventorying those properties to Federal agencies. We have funded in small increments, preparation of bibliographies pertinent to evaluating those resources. We have produced and presented papers on those resource categories for professional organizations. As a result, we are seeing better field recording and recognition of potential site value from land managing agencies, even though it still varies from enthusiastic to grudging. We have a long ways to go, but have created a foundation for professional consideration of those resource categories that did not exist a year ago.

The office concentrated considerable energies within the year in determining its position on how compliance should be handled in the Northern Tier pipeline project. Northern Tier will cross the entire breadth of the State. As background to deciding how compliance would be handled, we have just spent agonizing parts of the year reviewing cultural resource work done for the Northern Border project. Hence, we specifically looked at failures and misunderstandings on that project and at recommendations we knew would be coming from the Advisory Council on Historic Preservation in deciding the approach on Northern Tier we could accept. We signed the Northern Tier agreement on September 29, 1981. While we think it places more faith in BLM and consultants than our actual experience warrants, we find it to be worth trying--given previous experience and current political pressures on the regulatory process.







STATE OF NORTH DAKOTA  
FY'82 ANNUAL PLAN

PROGRAM OVERVIEW

Introduction

North Dakota's FY'82 Annual Plan is based on the recognition that:

1. loss of staff due to:
  - a. CETA cut-backs,
  - b. the uncertainty of Historic Preservation Fund funding to the states in FY'82 and beyond, and
  - c. elimination of support by the North Dakota Public Service Commissionposes major problems in maintaining an effective historic preservation program in our state.
2. approximately 40% of the work time in North Dakota's historic preservation program, based on FY'81 statistics, is expended in dealing with unanticipated problems (i.e., problems arising during the course of the year for which activities cannot be planned and thus included in the state's Annual Plan).
3. we must plan activities that are accomplishable within the time available (a 40 hour work week) rather than on what we would like to accomplish, which in FY'81 and prior years led to substantial and unreasonable amounts of overtime hours expended by professional staff as well as a failure to complete all activities planned.
4. continued participation in the federal preservation program will demand approximately the same amount of administrative time in FY'82 as in FY'81, regardless of the amount of funds awarded
5. continued participation in the federal program will demand approximately the same amount of time expended in the protection program element in FY'82 as in FY'81.

In FY'81 the maximum number of staff available at any one time to deal with the preservation program was twelve. We presently have a staff of seven and

expect that condition to exist throughout FY'82. In FY'81, 20,552 man/hours were expended on preservation program related activities by our staff; 2,136.5 of those hours, 10.4%, were overtime. Of the overtime hours, 96% were contributed by the seven members presently on staff. By eliminating overtime hours and assuming no changes in existing staff size we calculate that we will have 14,616 man/hours available to address preservation program responsibilities in FY'82 - a 29% decrease in time available when compared to FY'81.

In FY'81 work effort was distributed as follows:

Administration	- 7,658 man/hours (37.3% of work effort)
Survey	- 3,369.75 man/hours (16.4%)
Registration	- 978 man/hours (4.8%)
Protection	- 5,684 man/hours (27.7%)
Other (including	2,861.50 man/hours (13.8%)
but not limited	
to sick leave/	
vacation leave/	
holidays, etc.)	
TOTALS:	20,552 man/hours (100%)

Given recognition of the factors made above, FY'82 work effort should be distributed as follows:

Administration	- 7,050 man/hours
Survey	- 983 man/hours
Registration	- 983 man/hours
Protection	- <u>5,600</u> man/hours
TOTAL:	14,616 man/hours

Based on this time distribution, and upon the knowledge that fully 40% of our work time cannot be planned, we will direct our efforts in FY'82 as follows.

#### SURVEY/REGISTRATION

In FY'81 in-house survey related activity accounted for 3,369.75 man/hours (16%) of total time expended. Of that amount, 1318 hours was expended in coding site forms for data bank computerization, 162.5 was expended in conducting survey of individual historic structures at the request of the

property-owner or other interested party, 344 hours were expended by an employee on a temporary appointment in conducting minimum documentation level survey of four small communities, 755.25 hours were spent in planning, conducting, and reporting on archeological surveys and 790 hours was spent in a variety of survey-related activities such as monitoring the work of sub-grantees, holding public meetings to explain the benefits of resource identification, conducting cultural resource site file searches in response to information requests from federal and state agencies and private cultural resources contractors, clerical/secretarial, etc.

We are confronted with two major problems relating to the survey element: Inadequate staff size to conduct in-house comprehensive surveys and the need to respond to requests for individual property survey for purposes of nominating properties to the National Register of Historic Places.

In 1982 we will equally allocate the balance of our apportionment, following allocation of an amount necessary to meet internal program costs, to contractual surveys. Two archeological surveys are proposed. The first will result in identification of archeological resources on 7-10 square miles of state-owned lands thought to have a high potential for prehistoric habitation in Billings and McKenzie Counties. Such a survey is important since both counties are heavily impacted by oil exploration and extraction activities and because existing state-level cultural resources protection legislation, unlike the federal legislation, effectively deals only with the protection of known cultural resource sites; state-lands are thus prime exploration/extraction points in the oil-rich portions of our state, much of which is federally-owned or to which the federal government owns the mineral rights. The size of the survey area, while restricted by the anticipated funds available, is expected to be a large enough sample area upon which to base justifiable predictions regarding the presence and type of archeological resources in similar geographic areas of North Dakota.

The second archeological survey which we will contract for will result in survey of an area to be selected by the contractor. This project is designed to increase the area of North Dakota surveyed for archeological resources and to provide problem-oriented survey data. A survey structured

in this manner will enable a researcher to address questions of personal scientific interest while also providing information useful for management concerns. Proposals will be solicited, evaluated, and accepted on the basis of merit of research potential; this should increase the quality of both research and reporting.

Contracts to conduct historic structures surveys of all or a portion of six communities will be awarded. No community-wide historic structures surveys have been conducted in towns located in the western part of the state in past years because, although interest has been expressed, local matching funds have not been available. To overcome this problem we will, in FY'82 utilize state monies authorized to support our internal program as match for FY'82 federal funds which will be used as contract monies rather than as grant monies to the local communities. Surveys are projected for four communities in western North Dakota and one in eastern North Dakota. Contractual requirements will also provide for nomination development, at a minimum, for all potentially eligible historic districts and, if funds allow, for individually significant historic structures outside the boundaries of potentially eligible historic districts. Please note, however, that we cannot plan to nominate such properties until such time as revised National Register regulations have been promulgated. Based on past federal performance in that area we do not, therefore, anticipate being able to submit nominations completed as a result of the proposed FY'82 contractual surveys until sometime in FY'83.

With regards to the need to continue to respond to requests for individual property survey, we will publish a handbook explaining how the property-owner can conduct his own research to provide the factual basis for completing descriptive and significance statements. In the past, we have provided property-owners with excerpted portions of the publication How to Complete National Register Forms as a guide to doing their own nomination research. Experience indicates that what is needed is an explanation of what documentary resources are available, where to find them and how to use them. While we do not believe that publication and distribution of the proposed publication will eliminate the need for our staff to conduct additional research and/or edit nominations submitted to us by the private property



owner, we do believe it will minimize the amount of time we must spend in such activities as well as place the burden of responsibility more squarely on the property-owner seeking to have his property nominated.

### PROTECTION

As mentioned in the introductory statement, we do not anticipate a decreased workload or to decrease our thoroughness in dealing with our review and compliance responsibilities. During FY'81 the protection program element consumed 5,684 man/hours, of which 3,268 were devoted to review and compliance related activities. We will attempt to reduce the man/hours spent on such activities in FY'82 by revising project logging/tracking/filing systems and by revising our approach to responding to review matters. With regards to the latter, we have in the past provided written justification of the basis for our recommendations to the project sponsor. Since the basis for recommendation varies from project to project a considerable amount of secretarial time is spent in appending to the standard review comment form letters our justification for making recommendations. Insofar as possible, we will eliminate such justifications, thereby providing a savings in secretarial time expended in the review and compliance process. We will, of course, continue to include in our in-house files documentation of the reviewer's justification for making recommendations on a project-by-project basis.

Although we will not award grant funds for A&D projects in FY'82, we estimate that monitoring, and provision of technical assistance, to ten FY'81 and prior years grantees will consume the same amount of staff time in FY'82 as in FY'81 - 420.75 hours.

A major program function which we cannot plan for, but for which we are responsible as per the National Historic Preservation Act Amendments of 1980, is to assist local governments in becoming certified pursuant to subsection (c) of Section 201 of the amendments. If regulations relating to the fulfillment of this responsibility are promulgated during FY'82 we will make every reasonable effort to promote the idea of certification and assist local governments in becoming certified; however, to expend staff



time in promoting the idea prior to fully understanding the role we must play in the certification process and the regulatory framework within which the certified local government will be required to operate would, it seems to us, be premature.

#### MAJOR FY'81 ACCOMPLISHMENTS

We do not recognize any major accomplishments in FY'81 which might be of assistance to other states or that may be useful in the federal budget process.

Pursuant to P.L. 96-515, 10 percent of the planning estimate provided us through the August 12, 1981 letter from Jerry L. Rogers, Acting Associate Director, Archeology and Historic Preservation, is being reserved for local government programs.





## PROGRAM OVERVIEW

South Dakota's lack of resources continues to hamper historic site survey efforts. Neither the match nor the professionals exist here to undertake an adequate, timely inventory of historic properties. Volunteers have proven to be interested but volunteer results are mixed and often incomplete. Even some trained historians and geographers have difficulty with survey concepts.

Our response to the problem of mixed results, a more intense training session and stringent application procedure, has helped to improve performance, but available staff time limits training periods. Matching potential has been pushed to the limit and because much of even the professional surveyors donate a portion of salary to provide match, the possibility of attracting surveyors from out-of-state is remote.

The state still submits a relatively low number of National Register nominations for review each year but the number is increasing. The quality of nominations remains below the desired standard, largely due to a number of submissions from nonprofessionals. However, as an index of relative nomination quality, South Dakota is granted "category 1" status by the National Park Service. Nonetheless, many sites known to be eligible for the National Register remain unrecognized because information in the office cannot be processed given available staff. Considerable effort was made in 1981 to complete nomination material left from pre-1980 surveys. Unfortunately, most of the nominations developed were in private ownership and temporarily ineligible for National Park Service review. Our registration effort suffers from the same problems as the state survey, i.e. little expertise and money to work with. Formative solutions to those problems will not be produced in the near future.

The state staff continues to find certain federal agencies deficient in developing adequate procedures and programs to protect cultural resources within their jurisdiction. Some progress was made during FY 81 in developing communications with the U.S. Postal Service in their approach to building modifications in South Dakota, but the U.S. Forest Service's Black Hills Region has difficulties undertaking cultural resource protection measures.

The usual problems apply: too much land; too little money. Federal agencies are generally concerned about protection but their budgets do not stretch across the miles of property assigned to them. These are problems beyond the scope of this office but where assistance can be provided, as in pre-project reviews or guidance in site inspections, it is granted.

Because it is likely that FY 1982 will be a year replete with aberrations in the preservation norm, planning is essentially impossible. The main objective will be to survive the year. Funding will be delayed, interrupted, and possibly terminated. The Historical Preservation Center must prepare for that possibility.

Activities will concentrate on nurturing local and statewide preservation efforts and developing a network of preservation communication statewide. Much of what is necessary to accomplish a state preservation organization is

in place. Remaining are the objectives of expanding participation and establishing secure funding sources. To the extent possible, the Historical Preservation Center will assist in achieving those objectives.

There continues to be pronounced interest in the National Register program in the state. The essential services of reviewing and nominating to the Register those sites discovered through survey or brought to our attention by individuals will be undertaken.

If FY 82 funds are available, certain archaeological and historical sites surveys will be initiated, possibly continuation of the James River and Sioux River Valley surveys.

Protection activities will emphasize urging the USDA Forest Service to straighten its protective programs. Otherwise the level of compliance reviews will probably remain the same as in previous years. The policy of conducting expedient reviews and maintaining good working relationships with Federal agencies will continue.



## FY 1981 - END OF YEAR REPORT

## III PROGRAM OVERVIEW

Major Accomplishments

There have been few major accomplishments realized during 1981. We have conducted the business of operating a preservation program without crises. Funding uncertainties and a reduced staff have limited our ability to plan, our ability to initiate new programs and our ability to promote with certainty the concept of using the National Register as a tool for the diverse ends of communities, groups, and individuals.

Generally, the Funding situation forced the state agency to concentrate on developing preservation organization beyond the bureaucratic structure. For example, support to the state's nonprofit preservation corporation continued while funding to other activities was curbed. The result was a broader scope of cooperation and communication.

The development of a traveling exhibit of drawings, photos, and narrative history of the Standby Mine is an illustration: the project involved the Homestake Mining Company, the Historic South Dakota Foundation, the W. H. Over Museum, the Historical Preservation Center, the State Humanities Council, and a banking chain.

We have continued to monitor the amount of funds generated with Historical Preservation Center assistance. To date, South Dakotans have invested \$6,070,000 in private funds toward the completion of historic preservation construction projects. Those projects will net \$3,460,114 in state and local construction and real estate taxes alone. These and other figures are used to justify the continuance of historic preservation activities in South Dakota along with data demonstrating a direct relationship between tourist visitation and historic attractions in the state.

A draft historic preservation plan, or an outline draft was prepared this year to begin the organization of preservation goals and objectives for the eighties. The plan will be expanded throughout the coming fiscal year; but considering the current flux, it may exist as a working draft for a period of time.







## PROGRAM OVERVIEW

## I. Description of major accomplishments in FY 1981.

- A. A method we have used in matching has undergone two audits to verify its eligibility. We have for the last several years been offering 10% planning grants. These 10% planning grants are then matched by 90% from the applicant. These planning grants can be for plans and specifications, engineering studies, planning for historic districts, surveys, or other projects. The 90% money can be used to match other S&P expenditures such as staff salaries, or other S&P contractual agreements.
- B. We have opened a technical information service center. This information service center has some unique characteristics. First of all, it has hundreds of periodicals and reference books on technical methods of preservation. But more importantly, it has a set of standard specifications which are placed onto our word processing equipment, which meet the Secretary of the Interior Standards. These can be pulled off for any particular rehabilitation project. We have currently not identified every specification for every type of work, but we do have dozens of specifications in the word processing equipment which can be retrieved for everything from roof repair to stone cleaning.
- C. Annually we publish the Utah Preservation/Restoration Magazine under a unique partnership with a local publisher. Under the partnership agreement, we provide technical expertise, a number of the articles, and contacts on where articles can be obtained for the magazine, as well as screening the articles for professionalism and compliance with the Secretary of the Interior's Standards, if it involves technical preservation material. We also screen them for historical content and archeological content if they deal with these resources. We then agree up front to buy so many copies of the magazine at cost, and then the publisher sells the remaining magazines for profit. This has led to a high quality preservation magazine for a small commitment of staff time and dollars.
- D. We have established a central computer retrieval system for cultural resources in cooperation with the BLM, Forest Service, and the University of Utah. The system currently has 36,000, mostly archeological sites recorded by 97 variables, which allows varying locational retrieval, as well as an index of retrieval variables.
- E. Utah made significant progress in both the number and quality of nominations submitted to the National Register of Historic Places. The return rate from Washington during the year was less than 10%, showing continued improvement for last year's rate and significant improvement over the 1979 rate.



## Program Overview/2

- F. When funding cuts and staff losses required a halt to state efforts to implement the Resource Protection Planning Process, the program was explained to some private cultural resource companies resulting in one company providing funding to complete initial work for five study units for a particular area and time period for mining, agriculture, water development, settlement and architecture. In consultation with the State Preservation Office, experts were selected, instructed on the concept, assisted during the process and their final product reviewed by the office. The result of a combination of private initiative, professional involvement and State Preservation Office coordination, has been extremely positive.

## II. Program Elements: Assessment, Needs, and Supporting Activity.

The present state administration has been very concerned with the development of a statewide comprehensive planning process giving specific emphasis to the identification of and planning for specific state issues. To this end during the past year an "Agenda for the Eighties" program consisting of a series of public meetings, was held throughout the state, from which public concerns were expressed and then later addressed and defined by committees assigned to the categories of Growth, Natural Resources, Social Services and Health, Education and Cultural Resources, Public Services and Facilities.

The public meetings, chaired by local citizens and held on the same evening throughout the state were highly successful in terms of the number of citizens who participated, and the depth and breadth of their input. While the meetings addressed a broad range of problems and issues historic preservation concerns were expressed at most meetings. This led the Task Force on education and cultural resources to consider historic preservation a primary issue noting "Utah's history has not been as thoroughly researched and written as it should be. Utah's prehistory has also been neglected and is very fragile. The quality of life is enhanced through knowledge of, and contact with, the past. This history should be preserved and taught in the schools as well as the communities."

The Task Force then went on to offer the following recommendation in addressing the problem:

1. The history of Utah's people (individuals and families) communities, counties and institutions needs to be researched, written and published. This should extend into Utah's prehistory, a record which is even more fragile.
2. Historical, archeological, architectural and cultural sites, structures and objects, the tangible evidence of Utah's progenitors' labors, need be identified, evaluated carefully and preserved on a selective basis.

3. For any development projects in which federal funds are involved be certain that Executive Order 11593 (1971), mandating preliminary inventory of historic sites and areas and providing for preservation or mitigating measures for the sites and areas, is carried out in all cases. In cases where private investment is concerned, require that the same procedures of inventory and mitigation be carried out. In other words, make development share the cost of its impact on our state.

4. There should be undertaken a compilation of all known prehistoric sites in the state (for example, the Indian ruins underlying the San Juan County area) and an analysis of the significance and research potential they have, as well as their preservation and possible adaptation for tourism. Such a compilation and research design will aid in helping facilitate development as well as to preserve the most significant sites.

Based in part on the results of the "Agenda for the Eighties" and administration perceived priorities, the governor has just issued a draft statement of Planning and Policy themes. Five major themes are discussed in the statement: Manage Utah's Growth; Encourage an Expanding and Diverse Economic Base; Strengthen State and Local Government; Maximize use of Financial, Physical and Human Resources, Trust in Utah's Future. These themes were selected after a careful analysis of problems within the state and attention to goals for addressing the problems.

The management of Utah's Growth was divided into the three categories of Urban Development, Rural Development and Housing. It was noted that seventy-seven per cent of the state's total population lives in four geographically small urban counties -- and that "The patterns of merging sprawl threaten the unique identity of Utah's historical and cultural town centers."

In rural areas the problem of the boom-bust cycle resulting from economies based on one or two industries was discussed and the problem of Utah's natural resources being subject to "competing and often conflicting material and regional demands." Regarding housing, it was noted that between 1973-1977 nationally more than 3 million housing units or 5% of the total stock was lost and that in Utah by the end of this decade "where our children will live," will be major issue. One of the primary goals to meet this problem is the adoption of various programs and policies to encourage the preservation, renovation and rehabilitation of existing housing stock.

The second theme of developing an expanding and diverse economic base is of critical importance given Utah's exceptionally high birth rate, currently 40,000 births per year. In 1980 only 5,600 new jobs were created while there was a potential growth of the labor force of over 20,000 people. Priority will be given to expanding the economic base outside the Wasatch Front -- or present urban areas creating both an opportunity for and threat to important rural historic resources. In addition, a priority will be given to expanding tourism including greater use of historic resources.

## Program Overview/4

Governor Scott Matheson has noted "Not only must our ability to act quickly and creatively as a government be maintained and improved, but the structure of State Government must be strengthened and improved...The states must be prepared to play a larger role in the federal system." This need, he continues, has come about in part because "The tending of government to focus upon short-term problems and solutions while ignoring long-run consequences puts government officials in a reactive posture. Available resources are spent on current symptoms rather than preventing problems from developing in the first place." The expanded state role can be accomplished by the state's assuming certain responsibilities previously handled by the federal government, a more effective federal-state partnership in matters of dual concern; and by maintaining a coordinated and timely response to federal initiatives, including legislation, regulation and grant's through the A95 and A85 review process.

To maximize the use of financial, physical and human resource, Governor Matheson concludes, "We must be able to reorganize the incentives and disincentives created by public policy and make necessary adjustments. Effective use of the states financial, physical and human resources are an investment in Utah's future and will "provide future generations a rich endowment of resources, functional infrastructure and capital facilities. Future Utahns, our children, must inherit without choice what we leave them. They, too, must inventory their remaining resources and capabilities upon which their quality of life will depend. Our stewardship extends beyond current demands to future generations dependent upon the condition and extent of resources we choose to leave them"

The State Historic Preservation Officer and federal preservation program elements of Survey, Registration and Protection are critical factors in Utah's ability to meet the broad issues and concerns that have been expressed by Utah citizens and state government officials. Many of these issues and concerns are the result of previous or potential federal activity within the state.

The following discussion of problems, needs and solutions in each of the three program elements is prefaced by a definition of SHPO responsibilities under the program element and is based on the previous review of state issues, priorities and concerns.

### Survey:

The State Historic Preservation Officer has the specific responsibility to:

..."in cooperation with Federal and State agencies, local governments, and private organizations and individuals, direct and conduct a comprehensive statewide survey of historic properties and maintain inventories of such properties;"



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In addition survey concerns are part of the following general responsibilities:

..."prepare and implement a comprehensive statewide historic preservation plan;

..."advise and assist, as appropriate, Federal and State agencies and local governments in carrying out their historic preservation responsibilities;

..."provide public information, education, and training and technical assistance relating to the Federal and State Historic Preservation Programs; and

..."cooperate with local governments in the development of local historic preservation programs and assist local governments in becoming certified pursuant to subsection (c).

The fundamental problem is that the statewide survey has not been completed. This is because of the magnitude of the effort, especially considering the state's archeological resources, and a fundamental professional opinion that the survey process should be a continual, on-going process. The survey is the basis of the preservation program for it provides a context for determination of eligibility for immediate concerns relating to tax benefits and cultural resource management. The survey also serves as an essential long-range planning tool, especially critical in a state where the majority land owner is the federal government and proposed energy and military activities threaten a continued population explosion the state is ill-equipped to handle.

The solutions to the problem - the lack of a completed statewide survey - are primarily related to the issue of funding. Efforts are being made to secure state and local funding for inventories, as recommended by the "Agenda for the Eighties" Task Force on Education and Cultural Resources. However, federal funding for survey work is critical if we are to move from what Governor Matheson has identified as "the tendency of government to focus on short-term problems and solutions while ignoring long-run consequences." Additional solutions include development of more efficient surveying and inventorying methods and the use of volunteers including university students and interested citizens to assist in the survey work. The office feels that the survey philosophy as expressed in the Resource Protection Planning Process offers an excellent basis for the survey and inventory becoming even more valuable as a long-range planning tool.

### Registration:

The State Historic Preservation Officer has the specific responsibility to:

..."identify and nominate eligible properties to the National Register and otherwise administer applications for listing historic

## Program Overview/6

properties on the National Register."

In addition, registration concerns are part of the following general responsibilities:

..."advise and assist, as appropriate, Federal and State agencies and local governments in carrying out their historic preservation responsibilities;

..."cooperate with the Secretary, the Advisory Council on Historic Preservation, and other Federal and States agencies, local governments, and organizations and individuals to ensure that historic properties are taken into consideration at all levels of planning and development;

..."provide public information, education, and training and technical assistance relating to the Federal and State Historic Preservation Programs;"

There have been and are many problems associated with Registration. However, the need for an official registration process is obvious given the number of federal, state and local programs which rely on the National Register of Historic Places for official certification of historical, architectural and cultural value. The following five issues are of primary concern in Utah regarding registration:

- (1) The backlog of nominations created by the delay in the promulgation and adoption of new regulations to meet provision of the 1980 Historic Preservation Amendments. Utah has continued to hold Review Committee Meetings in anticipation of quick return on the regulations. However, it has been a year since privately owned nominations were presented to the State Review Committee and subsequently listed in the National Register. This has weakened the state's credibility since it is difficult to explain the different responsibilities in the registration process. It has caused the registration process to be viewed as an inefficient cumbersome bureaucracy in need of reform. The State will address this problem by continuing to pressure for implementation of the new regulations and, once the regulations are in force, submit the backlog of Utah nominations as quickly as possible.
- (2) Utah has found it difficult to respond to all requests for registration. The National Register of Historic Places has become a very positive program in Utah with many individuals, groups, and organizations anxious to have a particular building registered. While volunteers and interested persons are doing the majority of work in preparing nominations, there is a great demand for information on how to complete nominations and assistance in preparing statements of significance, maps and other components of the nomination which require professional assistance.



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This problem will be addressed through a series of internal adjustments to facilitate the processing of nominations, preparation of a handbook for assisting with Utah nominations to the National Register, working with universities in the state to make preparation of acceptable nominations a more vital part of historic preservation courses, and providing regular workshops and training sessions on preparation of National Register Nominations.

- (3) Since the office staff is required to spend almost all of its time processing and assisting with submitted nominations, the emphasis on a broad representation of significant properties has diminished. With the funding cutbacks and dismissal of staff, the office is no longer able to undertake the broad thematic and area nominations that had been given emphasis earlier in the program. As a result most nominations being generated by the public are residences, for the sake of family pride, or commercial buildings for the tax benefits.

Archeological sites, trails, mining sites and other important, but of lesser utility, resources are being neglected. The office is attempting to deal with the imbalance by seeking greater participation in the nomination process from professional disciplines, especially by scholars whose own research projects lend themselves to preparation of nominations, special interest groups - i.e. Mountain Men Organization to do fur trapping sites, and university and high school students as part of historic preservation or history and architectural course assignments.

- (4) The general nature of the National Register criteria has presented some problems in Utah. While the criteria for National Register listing must be broad and flexible it has been difficult to explain the program in light of the criteria while not arguing for more specific criteria, it is important to recognize this as a problem, that it takes a greater amount of attention and effort to explain it to the public and that a clear understanding of the National Register criteria, through the use of examples and continual dialogue is essential to the program. The solution to this problem lies in a continued education program and explanation of Utah National Register nominations, especially in the context of the National program.

- (5) While more than sixty percent of Utah is under federal ownership, federal agencies have not met their responsibility to inventory and register eligible properties under their jurisdiction. In the past the state office has attempted to assist federal agencies by preparing nominations on federal lands and registering them through the state process. With funding cutbacks this is no longer possible and efforts will have to be confined to assisting in instructing federal

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agency personnel about the registration process and raising the registration process to a higher priority.

### Protection

The State Preservation Officer has the specific responsibility to:  
 ... "prepare and implement a comprehensive statewide historic preservation plan;"

In addition, protection concerns are part of the following general responsibilities:

... "administer the State program of Federal assistance for historic preservation within the State;

... "advise and assist, as appropriate, Federal and State agencies and local governments in carrying out their historic preservation responsibilities;

... "cooperate with the Secretary, the Advisory Council on Historic Preservation, and other Federal and States agencies, local governments, and organizations and individuals to ensure that historic properties are taken into consideration at all levels of planning and development;

... "provide public information, education, and training and technical assistance relating to the Federal and State Historic Preservation Programs; and

... "cooperate with local governments in the development of local historic preservation programs and assist local governments in becoming certified pursuant to subsection (c).

It is apparent that the Utah philosophy toward historic preservation, as developed for the "Agenda for the Eighties" and the Governor's concerns for historic preservation as they relate to regulated growth, quality of life and providing useable resources to future generations, considers the preservation of the state's historical, architectural and cultural resources a high priority. While not all resources can be preserved, the orderly identification and recognition will help insure that proper consideration will precede decisions affecting resources. Therefore, the basis of Utah's protection program is a comprehensive identification and registration effort. Beyond these program elements discussed above the following issues are of primary importance in Utah's strategy to protect historic and cultural resources:

1. There is a widespread need for technical assistance in the renovation and restoration of the state's historical resources. As in other states much harm to historic buildings has resulted from misdirected renovation efforts. Utah has launched a small but very effective

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technical preservation service to assist owners of historical buildings. This service includes working with professional groups such as the Utah Chapter of the American Institute of Architects, business and others to make known to owners consultants, products and methods to help insure the most sympathetic efforts at renovation. Also a technical preservation library has been established for professionals and novices. Technical preservation publications have been prepared and distributed. These efforts will continue to the extent that funding permits.

2. In Utah it has been found that developers and businessmen are not opposed to historic preservation or cultural resource management, but they have found the process of working through federal regulations very frustrating. Utah has adopted a philosophy of assisting both the applicant and federal agencies in working through culture/resource requirements as quickly as possible. This has generated a much greater good will on the part of businessmen and developers including a willingness to protect those resources which have historic worth. Although there is a problem that some still see cultural resource management as an obstacle, a great deal of progress has been made since the adoption of this philosophy. Previously, the state had attempted to force compliance with federal regulations. We have already learned that a policy of genuine assistance is the solution to the problem of frustrated attempts at meeting federal cultural resource regulations.
3. The tax incentives for rehabilitation of historic buildings have been a very effective protection tool within Utah. Recognizing that many additional resources could be protected with this tool, the office is faced with the challenge of a golden opportunity to be met with very limited resources. The staff will continue to provide advice and assistance commensurate with its fiscal ability. In addition priority will be given to efficient processing of completed Tax Benefit applications.
4. Although the matching Grants in Aid program has been an extremely difficult program to administer, the acquisition and development grants which were available often provided the critical margin of success for preservation projects. The office views grants as an important part of the protection program and will work with state, local and private sources to develop funding to carry out a grants program within the state.

### Summary:

The Utah Preservation Program will be damaged if emphasis is shifted to meet only demands for comments or certification. The Governor and the people of Utah are concerned and have expressed an interest in Utah's planning processes and how they relate to future quality of life. Without the ability to plan and prepare for the impacts of Federal activity in the State of Utah through a coordinated program of survey, registration and protection, Utah's



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ability to have a say in its future will be greatly diminished. The spirit of Federalism and Federal partnership will be weakened and many more resources will be lost that could have been saved or recorded while still allowing Federal development to continue. Under current budget figures most of this coordinated effort is lost with only reactionary, piecemeal efforts remaining.

Note:

In accordance with P.L. 96-515, 10% of the planning estimate is being reserved for local government programs.







WYOMING HISTORIC PRESERVATION  
ANNUAL WORK PROGRAM  
FY 82

Introduction

The Wyoming Historic Preservation Program faces a dilemma in Fiscal 1982. The level of activity, will continue to accelerate while the number of staff members employed in the program will continue to decline.

Now is precisely the time we need a strong preservation program in Wyoming because of the tremendous amount of energy-related development and exploration. For example, the United States Geological Survey (USGS) projects that Wyoming will bring 4,715 oil and gas wells into production in 1982. By comparison, this same office projects 1215 wells for North Dakota, 580 for Montana, 400 each for Colorado and Utah, 195 for South Dakota and only 4 wells for Idaho. This means that Wyoming will exceed any of its contiguous border states by 288% to 3000% in this one resource alone. This does not take into account the surface coal mining activities in the state which are also considerable.

For these reasons, as the Wyoming Historic Preservation Program sets priorities in FY82, we will focus our survey, registration and protection attempts on state and privately-owned lands in areas of high impacts from energy development and population increase.

Because the number of staff members in the program will continue to decline in FY82, an emphasis will be placed upon the organization and development of additional local preservation groups as well as the continued encouragement and guidance for local groups formed in the past year. An implementation of this local preservation program emphasis will include the continued encouragement of liaisons formed by this office with local and county planning agencies. In areas where surveys have been completed, the emphasis will be placed on introducing protective legislation. In the areas lacking a sufficient data base, local planning agencies will be encouraged to conduct their own surveys.

SURVEY

With the anticipated reduced level of funding for the historic preservation program, the Wyoming Historical Survey, the state-wide survey directed by the University of Wyoming Department of History, will not be continued in its present form. The following activities will take the place of this survey in FY82:

1. One graduate student at the University will be assigned by the Department of History to survey a selected area under our guidance and direction.
2. The Albany County Planning Office and other interested planning agencies across the state will be provided with a minimal level of funding to conduct local surveys. We will develop mechanisms and establish criteria for funding for a local certification program.

3. Local community action groups will be organized in high impact areas, e.g. the Overthrust Belt, to conduct local surveys under our direction.
4. Architectural surveys will be conducted by our office in cities experiencing rapid population growth. A computer program will be developed for the information gathered in these surveys.
5. We will reinstitute and reinforce earlier volunteer survey groups which resulted from the Wyoming Historical Survey in order to complete the inventory process in these areas.
6. We will request a grant from the Wyoming Arts Council to fund an architect-in-residence program in a high impact city to conduct an architectural survey and to develop a mitigation program.
7. The Resource Planning and Protection Program (RP3), completed by December, 1981, will contain an evaluation of survey needs in impact areas. The suggestions in this report will be implemented.
8. All of the historic site data collected in the past years will be placed in a computer data bank for planning purposes and ease of accessibility. Archeological sites currently are entered into the data bank and new sites are entered on a daily basis.
9. The tribal government on the Wind River Indian Reservation will be offered an opportunity to conduct a cultural resource survey with our assistance.
10. Conduct a survey of all state-owned historic buildings.

With the concentration on the survey component of our program in the past two years, a number of potential National Register sites have been investigated and documented. The closing of the National Register by the federal government in January, 1981 has reduced the effectiveness of this program so there is a backlog of potential National Register nominations. The increased interest across the state in the tax incentives for the rehabilitation of historic buildings will lead to additional constituency nominations. The following activities will be undertaken for the registration component of the program:

1. Emphasis will be placed on writing nominations from previously researched and documented materials gathered in the past two years.
2. Rural district nominations will be written for historic areas which fall in high impact areas.
3. Local preservation groups will be encouraged and assisted in the writing of National Register nominations through workshops.
4. Owners of historic commercial buildings will be assisted in writing National Register nominations for their properties which will allow them to claim special tax benefits for rehabilitation.

5. Local governments will be encouraged to write and use National Register historic district nominations for protection and planning purposes.
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### PROTECTION

As stated earlier, Wyoming is experiencing a tremendous amount of energy-related growth, development and exploration. In addition, the survey activities in the past two years have revealed a number of areas where protection, policies and activities have been weak. The following tasks will be undertaken during FY82:

1. Continue as a "clearinghouse" for all cultural resource contracting work performed in the state with emphasis upon adherence to guidelines and standards established by this office.
2. Develop mitigation policies for cultural resource impact situations than include a review of actions before impact.
3. Complete a state research plan for archeological resources that identifies critical research questions.
4. Implement RP3 on a state-wide basis and develop a new state preservation plan.
5. Participate in the planning and passage of legislation that will permit the acquisition and development of historic sites through a state-funded program.
6. Prepare and present a state historic preservation legislation package.
7. Prepare an informational packet and conduct local workshops on the tax incentives for preservation in impacted areas for realtors, businessmen and financial decision-makers.
8. Increase the number of locally organized preservation action groups.
9. Begin to develop a plan for the preservation and/or rehabilitation of state-owned historic buildings.
10. Promote appreciation of the built environment and build a preservation ethic in elementary school children in cooperation with the Department of Education.
11. Development special topic slide shows on topics such as historic sites in Wyoming, preservation techniques and tax incentives.
12. Assist local governmental agencies in developing preservation legislation and zoning ordinances that protect cultural resources.
13. Encourage counties to establish historical commissions or boards.



## FY 81 End-Of-Year Report

Special Accomplishments

A mid-year evaluation of the program revealed weaknesses in the advocacy portion of our effort. Because constituency National Register nominations, tax act certifications and formation of local preservation groups are dependent upon an effective advocacy program by the SHPO, an ambitious campaign was undertaken in the latter half of the FY. The two major activities are as follows:

## 1. Historic Preservation Week

- a. Printing and distribution of 5,000 Wyoming Preservation Week posters with funds and services provided by Chevron U.S.A. and other energy companies.
- b. Proclamations signed by the Governor and at least seven Mayors. Other proclamations were undoubtedly signed but were not officially reported to our office.
- c. A program on the architectural heritage of Wyoming, funded by the Wyoming Council for the Humanities, given in Cheyenne and Laramie.
- d. A traveling photo display on preservation was placed in the State Capital lobby.
- e. Preservation Week programs in Cheyenne and Casper were sponsored by the respective City/County Planning Offices.
- f. Two television stations and seven radio stations across the state ran public service announcements about preservation. The announcements were provided by our office.
- g. A special news feature on the Cheyenne television station on a historic ranch and a special radio broadcast on preservation aired in Cheyenne.
- h. Locally generated celebrations, with assistance from our office included photo displays, guided tours, newspaper articles on local historic sites and programs in the schools and libraries.

By utilizing an identified and informed volunteer network developed by this office and by the University of Wyoming survey, the non-professional preservationists in Wyoming helped the Wyoming SHPO implement the first truly statewide Historic Preservation Week celebration.

## 2. Tax incentives workshops

- a. A seminar on tax incentives was held in Cheyenne in February in cooperation with the regional office of HCRS.
- b. Programs on historic preservation were presented to businessmen associations and community service organizations.
- c. The National Trust film "Main Street," was shown in six selected communities during the month of August and was followed by a discussion of the tax incentives for rehabilitation of commercial buildings.



- d. A news release on the Economic Recovery Act of 1981 was sent to all Wyoming news outlets. The news release emphasized the tax incentives for historic rehabilitations.
- e. A preservation proposal for Downtown Evanston was prepared for the Overthrust Industrial Association.
- f. A working relationship with the Wyoming Realtors Association was established which includes the future introduction of grant-in-aid legislation by the Political Action Committee of that Association.

The results from the campaign to increase public awareness of the tax incentives for historic preservation are becoming apparent. A number of persons have requested application forms for tax certification and daily telephone calls and/or letters are received from interested property owners, realtors and accountants.

Another weakness in the historic preservation program revealed by the mid-year evaluation was the lack of communication and coordination of projects with other state agencies and within our own state agency. Significant progress has been made toward increasing interaction through the following programs:

1. Supervision of historic buildings in state parks.
  - a. Plans, interpretations and supervision of construction projects on historic buildings in state parks has been transferred to the Historic Section from the State Parks Division.
  - b. Budgetary requests for the next biennium were prepared by the Historic Section.
  - c. Historic overviews were written and incorporated into the long-range plans of three State Parks with an emphasis upon the preservation of cultural resources.
2. An Ad Hoc Site Development Committee has been formed in cooperation with the Archives, Museums and Historical Department. This committee has been able to discuss mutual problems revolving around state-owned and operated historic buildings, resolving disagreements before they reach unmanageable proportions as has occurred in the past.
3. A working relationship has been established with the Wyoming Council on the Humanities which resulted in the funding of a program on architecture during Historic Preservation Week and perhaps will result in the funding of a public issues program on preservation next year.
4. A cooperative effort has begun between the Wyoming Arts Council and this agency regarding the preservation of architecture in impacted cities.
5. A liaison has been made with the State Fire Marshall's office to promote fire prevention in historic buildings, to investigate arson in historic buildings and to promote tax incentives as a method of reducing arson in historic commercial buildings.

6. A historic preservation program will be prepared in cooperation with the State Department of Education for elementary school aged children and will be distributed by that Department.
7. A two day seminar was arranged in cooperation with the Wyoming State Highway Department. The subject of the seminar was "106" review processes.
8. A feasibility study on a historic building owned by the University of Wyoming is being prepared at the request of the Appropriations Committee of the Wyoming State Legislature.
9. Participation on an Ad Hoc Committee created by the Governor permitted the SHPO to comment directly on the proposed purchase of a historic house in Cheyenne. A feasibility study was prepared also.
10. A contract with the Department of Environment Quality to provide a data base for their use in determining lands unsuitable for surface coal mining provides the SHPO with opportunities to be in frequent contact with that agency.
11. The on-going contract with the University of Wyoming Department of History to conduct a historic site survey in four counties provides regular access to the academic community.

Other state agencies have been contacted in the past year and the cooperative relationships established with a number of the city/county planners through intensive survey activities continues to be nurtured through periodic contacts and efforts to pass local preservation legislation.

The Review and Compliance function of the Wyoming SHPO was reorganized in the past FY, the staff was expanded and a restructuring of duties and obligations was accomplished. Because Wyoming is one of the most important energy development states, the volume of archeological and historic reports submitted to our office is enormous with 2,641 reports received since February. The Review and Compliance Program now functions as a "clearinghouse" for all cultural resource contacting work performed in the State. This Section comments on archeological and historic reports submitted by 30 private consulting firms, 8 Federal agencies, and 5 State agencies. In addition to the initial survey reports, Federal legislation requires that we provide comment on Draft and Final Environmental Impact Statements, Determinations of Eligibility and Effect, Mitigation Proposals, National Register Nominations and so on. Procedures have been devised which allow this paperwork to pass through the review process with a minimum of delay.

The major accomplishments of the past year include:

WYOMING HISTORIC PRESERVATION  
ANNUAL WORK PROGRAM  
FY 82

Introduction

The Wyoming Historic Preservation Program faces a dilemma in Fiscal 1982. The level of activity, will continue to accelerate while the number of staff members employed in the program will continue to decline.

Now is precisely the time we need a strong preservation program in Wyoming because of the tremendous amount of energy-related development and exploration. For example, the United States Geological Survey (USGS) projects that Wyoming will bring 4,715 oil and gas wells into production in 1982. By comparison, this same office projects 1215 wells for North Dakota, 580 for Montana, 400 each for Colorado and Utah, 195 for South Dakota and only 4 wells for Idaho. This means that Wyoming will exceed any of its contiguous border states by 288% to 3000% in this one resource alone. This does not take into account the surface coal mining activities in the state which are also considerable.

For these reasons, as the Wyoming Historic Preservation Program sets priorities in FY82, we will focus our survey, registration and protection attempts on state and privately-owned lands in areas of high impacts from energy development and population increase.

Because the number of staff members in the program will continue to decline in FY82, an emphasis will be placed upon the organization and development of additional local preservation groups as well as the continued encouragement and guidance for local groups formed in the past year. An implementation of this local preservation program emphasis will include the continued encouragement of liaisons formed by this office with local and county planning agencies. In areas where surveys have been completed, the emphasis will be placed on introducing protective legislation. In the areas lacking a sufficient data base, local planning agencies will be encouraged to conduct their own surveys.

SURVEY

With the anticipated reduced level of funding for the historic preservation program, the Wyoming Historical Survey, the state-wide survey directed by the University of Wyoming Department of History, will not be continued in its present form. The following activities will take the place of this survey in FY82:

1. One graduate student at the University will be assigned by the Department of History to survey a selected area under our guidance and direction.
2. The Albany County Planning Office and other interested planning agencies across the state will be provided with a minimal level of funding to conduct local surveys. We will develop mechanisms and establish criteria for funding for a local certification program.



3. Local community action groups will be organized in high impact areas, e.g. the Overthrust Belt, to conduct local surveys under our direction.
4. Architectural surveys will be conducted by our office in cities experiencing rapid population growth. A computer program will be developed for the information gathered in these surveys.
5. We will reinstitute and reinforce earlier volunteer survey groups which resulted from the Wyoming Historical Survey in order to complete the inventory process in these areas.
6. We will request a grant from the Wyoming Arts Council to fund an architect-in-residence program in a high impact city to conduct an architectural survey and to develop a mitigation program.
7. The Resource Planning and Protection Program (RP3), completed by December, 1981, will contain an evaluation of survey needs in impact areas. The suggestions in this report will be implemented.
8. All of the historic site data collected in the past years will be placed in a computer data bank for planning purposes and ease of accessibility. Archeological sites currently are entered into the data bank and new sites are entered on a daily basis.
9. The tribal government on the Wind River Indian Reservation will be offered an opportunity to conduct a cultural resource survey with our assistance.
10. Conduct a survey of all state-owned historic buildings.

With the concentration on the survey component of our program in the past two years, a number of potential National Register sites have been investigated and documented. The closing of the National Register by the federal government in January, 1981 has reduced the effectiveness of this program so there is a backlog of potential National Register nominations. The increased interest across the state in the tax incentives for the rehabilitation of historic buildings will lead to additional constituency nominations. The following activities will be undertaken for the registration component of the program:

1. Emphasis will be placed on writing nominations from previously researched and documented materials gathered in the past two years.
2. Rural district nominations will be written for historic areas which fall in high impact areas.
3. Local preservation groups will be encouraged and assisted in the writing of National Register nominations through workshops.
4. Owners of historic commercial buildings will be assisted in writing National Register nominations for their properties which will allow them to claim special tax benefits for rehabilitation.

5. Local governments will be encouraged to write and use National Register historic district nominations for protection and planning purposes.

### PROTECTION

As stated earlier, Wyoming is experiencing a tremendous amount of energy-related growth, development and exploration. In addition, the survey activities in the past two years have revealed a number of areas where protection, policies and activities have been weak. The following tasks will be undertaken during FY82:

1. Continue as a "clearinghouse" for all cultural resource contracting work performed in the state with emphasis upon adherence to guidelines and standards established by this office.
2. Develop mitigation policies for cultural resource impact situations that include a review of actions before impact.
3. Complete a state research plan for archeological resources that identifies critical research questions.
4. Implement RP3 on a state-wide basis and develop a new state preservation plan.
5. Participate in the planning and passage of legislation that will permit the acquisition and development of historic sites through a state-funded program.
6. Prepare and present a state historic preservation legislation package.
7. Prepare an informational packet and conduct local workshops on the tax incentives for preservation in impacted areas for realtors, businessmen and financial decision-makers.
8. Increase the number of locally organized preservation action groups.
9. Begin to develop a plan for the preservation and/or rehabilitation of state-owned historic buildings.
10. Promote appreciation of the built environment and build a preservation ethic in elementary school children in cooperation with the Department of Education.
11. Development special topic slide shows on topics such as historic sites in Wyoming, preservation techniques and tax incentives.
12. Assist local governmental agencies in developing preservation legislation and zoning ordinances that protect cultural resources.
13. Encourage counties to establish historical commissions or boards.





# Southwest Region



Arizona  
Colorado  
New Mexico  
Oklahoma  
Texas  
Utah









## Fiscal Year 1982 Historic Preservation Fund Application

## Arkansas Historic Preservation Program

The Arkansas Historic Preservation Program had as its primary goal in fiscal year 1981 strengthening performance in the basic areas of survey, protection and registration. Progress was made in each area but budgeting uncertainties-- and the resultant staff fluctuations, expenditure questions and reevaluation of program goals-- caused a sometimes uneven movement in the accomplishment of program goals.

Many of the goals set for 1982 reiterate the concerns of 1981, and the accomplishments in the basic elements have only served to show that all other possible functions rest on the effective implementation of the basic elements. Implicit in the goal of strengthening the basic program elements are those of improving communication both within the staff and between the staff and the public it serves, and increasing the accessibility of information collected by the AHPP and other groups and individuals working in preservation or related fields in the state.

The Archeological Survey's greatest accomplishment during the year, was the completion of the State Plan for the Conservation of Archeological Resources in Arkansas. The long term benefits of this document cannot be assessed until it is used, but the Study Units have been reviewed by the Survey staff, and used as the basis for establishing significance and for development of research designs for several projects done both by Survey personnel and by non-Survey archeologists doing contract projects in Arkansas. A workshop planned for March, 1982 participated in by all archeologists and federal agency representatives, will provide commentary on the State Plan organization, presentation, usefulness, and problems.

In 1981 the AHPP had as a primary goal the development of a resource protection management plan that would entail not only identifying resources but also placing them within a valid comparative context with defined geographic, chronological and conceptual parameters. Such a plan would serve as a predictive model for concentration of field survey efforts, for anticipation of resources in areas to be affected by projects and by exploration and development of sources of energy, and commented on through the environmental review process

and for the allocation of staff resources in the areas of registration and assistance. The AHPP applied for and received in FY 1981 a grant through the Heritage Conservation and Recreation Service to assist in developing and implementing this type of approach. The Arkansas Archeological Survey (AAS) had received a similar grant in 1978 and finalized its portion of the plan in FY 1981, as mentioned above. Work was initiated on developing the historical and architectural portions of the plan, including assembling a group of professionals in several fields relating to the objectives of the plan (archeology, historic archeology, historic architecture, architectural history, and so forth) to discuss and make recommendations on the approach to pursue. Two reports were developed and submitted to the Department of the Interior but staffing shortages and other program demands restricted the AHPP from committing sufficient resources to the full development of the plan. As a result the State Plans and Grants section of the Department of the Interior recommended several significant changes in the reports. Substantial additional research was performed and a new version of Report I was submitted to the National Park Service on August 28, 1981. The AHPP anticipates that the resource protection management plan that results from this process will be a comprehensive document that will provide an effective context for implementation of the survey, as well as facilitating the other program elements referred to above in FY 1982.

A survey and planning grant for the development of a master plan for research and interpretation of Old Davidsonville State Park was completed in FY 1981. The work included two and a half weeks of testing at the site done in conjunction with the annual training program for amateur archeologists, as well as considerable archival work. A draft report has been prepared by Ms. Shawn Bonath and is being reviewed at the present time, but requests for continued funding through the State Legislature were denied, and the research station has been closed.

Excellent progress has been made on the computerization of the archeological site files through the Automated Management of Archeological Site Data in Arkansas program including the beginning of encoding and input of site data. Despite a complete cutback in FY 81 in survey and planning funds for personnel

to work on this project the Survey felt it important that this program not be eliminated entirely, and has provided some funds to keep the plotting and encoding going at a minimum level. In addition, excellent progress has been made, through a combination of survey and planning funds and contract funds, in individual projects, in the development and implementation of the DELOS system for computerization of artifact and provenience data. The research staff at Toltec has expended considerable time developing the encoding manual for this information system. The AHPP was able, through the coordination with survey efforts conducted privately and through directed in-house solicitation of information, to make significant additions to the number of structures recorded at a minimum level of documentation in the files in FY 1981. Additionally, the AHPP has added to its files an index of the inventory of 2,000 drawings of Charles L. Thompson, an Arkansas architect who played a significant role in the development and diffusion of architectural styles in Arkansas in the late nineteenth and first half of the twentieth centuries. From the Thompson drawings a survey was conducted and 400 structures were found to be extant. The addition of this information to the survey files will provide additional assistance in the environmental review process as well as serving as a contextual base for the field survey work to be conducted as the resource management process is implemented. A thematic nomination based on the Thompson survey material will also be developed during FY 1982.

The AHPP continued in 1981 its efforts aimed at providing an accessible, understandable constituent National Register process. During 1981 the program allocated the resources of one staff person and the assistance of others to the constituent NR process, and will continue to do so in 1982. 112 persons were assisted through the constituent process in 1981, approximately 15 nominations were presented to and passed by the State Review Board during the year, and 50 properties were added to the survey inventory as a result of information gathered through this process.

A highlight of the end of FY 80 was the dedication of Toltec Mounds State Park -- as a park, as a National Landmark, and in recognition of the opening of the Visitor Information Center. In addition, by the end of FY 80, Stage I



of the field research was complete. As a consequence, Toltec research personnel have spent FY81 processing information, preparing for computerization of data, and making preliminary plans for beginning Stage II. Stage II involves more field research and at present there are not state nor federal funds for this work.

For the archeological program, all other problems pale in the light of the loss of research assistants at the research stations across the state. These positions were funded partly through state and partly through HPF Survey and Planning monies, and the State could not take up the slack when the federal funds were not available. Since the assistants job was upgrading and making additions to the site inventory, providing input for the computerization and allowing the Station Archeologists time for evaluation and research, not having these individuals hamper all activities in these program areas. Survey and registration will not cease entirely, of course, but drastic curtailment will be seen. An example can be shown in the fact that instead of two people working about half time on the research and documentation of the Rock Art documentation and nomination forms, less than half a person was available to complete this work in FY 81 and as a consequence it is only just nearing completion, and will be presented to the State Review Board in December, 1981.

To further the efforts toward an accessible National Register process two seminars will be offered in 1982 to familiarize persons within the state on the inventory and nomination process as well as other activities and services performed by the AHPP and the AAS. The seminars will be offered at cities that serve as regional centers, with the sites to be chosen based upon resources, need and local interest. This outreach effort will make the resources of the agencies available to persons in the state who currently are not completely aware of the agencies' activities or are unable to obtain access to them.

The AHPP will continue in FY 82 its effort to provide for an inventory of cultural resources in Arkansas that is more truly representative of the state's development and resources and responsive to the need for interfacing preservation goals with local community and economic development as well as with the ongoing

search for sources of energy. While the delays in completion and implementation of the resource protection management plan prevented the full implementation of this objective in 1981, significant progress was made in the area. The staff prepared and presented three nominations of religious structures that resulted from an AHPP survey of 200 religious structures in the state. Additionally, the staff presented and prepared two multiple resources nominations that were presented to the Arkansas State Review Board, a nomination resulting from the intensive survey of a former rural county seat in North Central Arkansas, and one resulting from the survey of a mid-nineteenth century regional center in Northwest Arkansas.

In fiscal year 1982 the AHPP will prepare and present a thematic nomination derived from an intensive review of the Thompson survey and drawings. Additionally, the staff will implement a registration process based upon the survey data that will be generated from the field survey efforts that grow out of the resource management plan. Of course one of the primary activities in FY 82 will be the final processing of nominations passed at the state level for review in Washington, D.C. once new regulations are in place. The number of nominations waiting for review in Washington is in excess of 30.

AHPP was able in 1981 to respond effectively to requests for technical assistance from constituents throughout the state. Work on 29 subgrantee projects was monitored, and assistance provided through the monitoring process during the year, while the architectural staff responded to telephone, written and personal requests for information and assistance on the details of preservation projects at the rate of about one a day during the year. 19 certifications of significance and 22 certifications of rehabilitation (under the tax Reform Act of 1976) were reviewed using the process detailed in the end of the year report. Additionally, information on the tax act, and other areas related to financing of preservation projects, was provided to approximately 150 persons requesting it during FY 1981. AHPP purchased over 200 copies of the Technical Preservation Service report on access to buildings for disabled in 1981 and will disseminate them to persons working in the area of handicap accessibility for historic buildings.

In the upcoming year the AHPP will maintain its posture of providing assistance and monitoring for ongoing subgrantee projects, of responding in a complete



and timely manner to requests for architectural assistance and of reviewing of tax act applications. In addition to continuing this level of service the AHPP plans to heighten constituent awareness of and benefit from these services through an outreach effort in 1982. The effort will include a mailing of updated information on changes in the tax benefits for historic preservation, two regional seminars that will include information on technical services, distribution of information about services available from AHPP through "DANCH Directions", the tabloid newsletter distributed throughout the state by the Department of Arkansas Natural and Cultural Heritage, and a continued effort to contact and work with local communities.

In FY 81 a total of \$100,000.00 was allocated to four grant-in-aid projects in Arkansas. (see attachment C) Three of the projects did not receive the funds as a result of the withdrawal of unobligated funds. The Toltec Mounds project, funded at \$10,000.00 was approved and is underway at the present time. The other three projects will be funded, pending approval of requests for reallocation of funds with FY 1980 monies. One of the three projects -- the Charleston Courthouse -- will go forward with its original scope of work, the others will have amended scopes of work to reflect changes in the amount of the grant award. The Marianna Elks Club, or Community House, is in a city with a large minority population and will be open equally to all members of the community. A minority person is on the board governing the operation of the Community House.

The protection element was the most seriously affected by staff changes during FY 1981. During a six month period the position of environmental review coordinator at AHPP was filled by three different staff members and currently is filled by the staff person also responsible for coordinating tax certification applications. As a result the planned activities for outreach and heightened communication with critical agencies were not fully achieved in FY 1981. The copy for a brochure on environmental review procedures was prepared but the layout and printing of the brochure were not accomplished, due in part to funding uncertainties and in part to staff changes. Efforts were made and were effective, to maintain communication and to insure that critical

agencies were informed of staffing changes in this area. The AHPP did maintain its level of response to requests for review and comments on A-95 notices, assessment cases, Corps of Engineers permits, environmental assessments, and general permits during FY 1981.

In FY 82 the AHPP will continue to comment in a complete and timely manner on environmental review cases. Additionally, the environmental review coordinator will continue to pursue closer communication with critical agencies in order to involve the AHPP in the earliest feasible stages of project planning. Representatives of critical agencies will be specifically invited to attend the planned regional seminars, at which environmental review concerns will be addressed.

It is anticipated that most survey and registration work dealing with archeological resources will come in FY 82 as a result of the needs of federally sponsored projects in the state. The State program staff will continue to plug away at upgrading the basic survey records, and making evaluations where appropriate, but much of their obligation will revolve around research projects begun in the previous year or two and hampered by the loss of the assistants.

Because of the continuing and probably increased amount of archeological work done for federal agencies and for federal compliance regulations, the ability of the State Archeologist and Compliance Office to review survey and evaluation reports, and to monitor projects is felt to be vital to the protection of archeological resources in the state. The survey's commitment to this is reflected in the fact that reductions in state appropriations have resulted in reductions in personnel at the stations, and with support staff at the Coordinating Office but reduction in the Compliance Office of only the equivalent of a quarter time person. With the State Plan to serve as guidance, it is felt that the best possible decisions will be made concerning significance and eligibility of archeological resources in the National Register process, whether the work is done by agencies and entities not associated with the State program, or whether they are done by the Survey's contract program itself. The appropriate treatment and protection of archeological resources and archeological data can be accomplished by this process.

In the realm of protection, however, it is critical that the Parkin Indian Mound site become a part of the State Park system in the near future, as requested by the State Legislature. The setbacks in acquisition of the land by the city of Parkin during FY 81 have not boded well for accomplishment of this goal, and it will be of utmost importance for the Archeological Survey and State Parks to cooperate and provide aggressive leadership in seeing that acquisition is finalized.

In FY 81 the AHPP was extremely active in the area of providing public information, education and assistance to individuals, groups and communities throughout the state. The program continued its policy of notifying and soliciting comments from public officials on all National Register nominations in their communities, as well as contacting local officials on selected environmental review projects. The AHPP made a concerted effort in 1981 to expand contact with local officials. Staff members notified local officials when any significant program work was underway in their community, and the public information officer began a series of personal meetings with local officials in an effort to establish a personal, direct line of communication.

A highlight for the AHPP in FY 81 in the area of public contact was developing the practice of holding ceremonies to present certificates noting the inclusion of properties in the National Register in eight cities in the state. Local officials, state legislators, members of the press, and persons active in preservation locally were invited to attend the ceremonies as well as the National Register property owners. Attendance and press coverage were, in almost every case, excellent, providing an opportunity to meet community members and describe the services offered by the program.

Other activities directed at increased public awareness included personal interviews with various media in eight cities throughout the state, calling or assisting in public meetings on specific issues in five cities, and addressing classes in educational institutions in four cities as well as a number of presentations made to community groups, service organizations and residents of nursing homes.



In FY 81 the various components of the program worked with local and private groups toward meeting preservation goals. The AHPP assisted in the National Trust conference on local historic districts held in Little Rock, with two staff members making presentations. The AHPP joined as a co-sponsor of the Smithsonian Events, a group of lectures held in Little Rock in March and April of 1981. The lectures included, "Early Life on the Mississippi: The Temple Mound Builders" and a related on-site visit to Toltec Mounds; and a lecture, "Horticultural Extravaganzas of the Victorian Era" which had a related practicum held at a Victorian house museum in Little Rock. AHPP staff also prepared the copy for a brochure on locally ordinance historic districts to be published by the Quapaw Quarter Association, a Little Rock based non-profit preservation organization.

The AHPP did not achieve its goal of establishing a regular form of written communication with local officials through means of a questionnaire and follow-up correspondence. This format was originally conceived as an avenue for ultimately implementing the 10% pass through in appropriations. As funding uncertainties made the future of the program, and the 10% pass through more and more difficult to predict, the benefit of undertaking such a program of communication if FY 81 came into question. As a result, this objective was not fully implemented. The AHPP has, however, participated actively in the planning and production of the newsletter published by the Department of Arkansas Natural and Cultural Heritage, and intends to pursue this communication goal through that medium. The newsletter is distributed to locally elected officials within the state as well as to a broader constituency.

In FY 1982 the AHPP plans to continue its efforts at public contact and education through notifying local officials of Register nominations, consulting with them on selected environmental review cases, providing information and assistance as requested by the public, soliciting interviews and appearances on the various media and speaking to both civic groups and classes throughout the state. Additionally, the AHPP plans to hold at least two seminars at regional centers within the state to familiarize constituents with the activities and services performed by the program. The AHPP will continue to provide information and articles to the Department newsletter on various aspects of preservation in Arkansas.

The AHPP will also continue its practice of holding National Register certificate ceremonies in communities throughout the State, inviting local officials, preservationists, and press.

The Archeological Survey's public service program remains strong, with the training program for amateur archeologists as continuing commitment. The Survey prepared a large exhibit for the 10-day state fair and each research station prepared or participated in local exhibits. In addition to a new brochure on the Survey's program is already in draft form, to update and upgrade the one designed and prepared in 1967. Stress has been given and will continue to be in FY 82, to publication of research results, both technical reports and ones for popular consumption. FY 81 saw the best production rate in this area of service so far in the Survey's history. A fund from sales provides money for publication of reports which are not provided for from other sources; it is this fund which will aid in the publication of the State Plan.

The Survey and its work were featured in two 30-minute broadcasts on public television in Arkansas during FY 81, one on Old Davidsonville and one on Parkin Mound. Survey personnel made approximately 80 public lectures during the year, 30 of which were in the schools, the rest being to local service groups or university classes of various kinds.

The AHPP plans to implement the ten per cent pass through of appropriated funds to qualified local governments provided for in the reauthorization legislation. The program is prepared to notify municipalities of the availability of the funds and proceed with certification of qualified local governments when funding and regulations for the pass through are confirmed and disseminated.







## OVERVIEW STATEMENT

I. Major Accomplishments

1. Perhaps our most noteworthy accomplishment in the past year has been the continued implementation and further refinement of the citizen survey system. This has been used to survey an entire parish (the Franklin Parish survey, in which 37 sites have to date been documented). This has built a strong preservation movement within the parish as well as providing the State Historic Preservation Office with valuable data completely free of charge. The use of citizen survey committees to work on district registration has been brought closer to perfection. We have learned much about gaining public support, coordinating the committee's work, and, in particular, setting deadlines for committee work. As a result, it is now possible to pass two sizable historic districts at each quarterly review board meeting. This is now a routine pace -- something which would not have been possible two years ago. Moreover, each historic district effort leaves a solid core of preservation advocates behind to carry on the work.
2. Secondly, our system of having National Register applicants submit in advance all the required material for a nomination, and then working up a basic application in the office, has become more or less routine. There is minimal staff time devoted to each nomination and each citizen-generated application is seen to expeditiously. There is no waiting. At the same time, we were able to nominate eight historic districts and twenty individual nominations of our own choosing. We feel that we have demonstrated that there is no need to choose between public responsiveness and valid nomination priorities. We can have them both.

II. Problems and Solutions

## 1. Review and Compliance

Our concerns regarding the review and compliance process are centered around our ability to provide expeditious and competent review response and assistance. We are virtually unable to make site visits or procure much of the needed information on our own. Consequently, the information necessary for the State Historic Preservation Office to make the proper decisions must almost invariably be provided by local governments, federal agencies, or their contractors. We have been operating one staff person short in review and compliance for some time. Given the current budgetary restraints, it seems that staff time will continue to be highly restricted for some time to come. In our opinion the most effective way to maintain and improve our review and compliance services is to try to insure that adequate information is submitted by the project sponsor in the first place. Secondly, we need to educate federal agencies, local governments, and their contractors as to what constitutes an adequate review and compliance submission. Thirdly, we must increase intraoffice efficiency in dealing with environmental review matters. Finally, we need to increase survey activity across the state.

We are continuing to address these needs in various ways. To begin with, guidelines for conducting cultural resource surveys are distributed to all contractors, and workshops are held. These are updated as new concerns and problems emerge. This has eliminated some of the delays which used to result from inadequate submissions. Secondly, we have taken steps to inform federal agencies and local governments of preservation responsibilities and opportunities through cultivating local contacts, publications and workshops. This work will continue in FY 82. Thirdly, the State Historic Preservation Office will actively pursue parishwide citizen volunteer surveys across the state. We will also upgrade our comprehensive standing structures survey by more rigorously monitoring the work of our three surveyors, and by giving them feedback on a more regular basis. Finally, the State Historic Preservation Office will continue to pursue the cooperative agreement reached last fiscal year with the Louisiana Department of Urban and Community Affairs in which HUD funds are used to conduct communitywide surveys across the state.

## 2. Public Input and Local Community Development

These two needs are linked by the fact that the largest number by far of historic structures across the state are in communities, and it is in these local communities that the need for public input, understanding, and support is the greatest. In addition, in town after town, it is the older communities which are most in need of economic redevelopment.

Analysis of the state's needs in these areas has led to the identification of four basic problems:

- a. The public at large lacks a clear understanding of the state preservation program, what it does, and just as important, what it does not do.
- b. There are those who perceive preservation to be a threat to private property rights.
- c. There are those who regard the program as unresponsive to public needs.
- d. Although there is interest in revitalizing older communities across the state, in many cases it is unmustered and directionless, or else it is not strong enough to be effective.

In response to these problems, we established the following broad goals:

- a. To create more visible channels for public input into the work of the preservation program.
- b. To inform a broader segment of the state population about the program and to attempt to "bring them into the fold."
- c. To dispel any negative image we may have vis à vis private property rights and unresponsiveness.
- d. To analyze the present input and adjust our responses where necessary.
- e. To target those groups in local communities which are presently "outside the fold" and which might do the most good for local preservation and economic redevelopment and to develop methods of procuring their support.

These goals have been met, and are continuing to be met in the following manner:

In order to make the public at large more aware and less fearful of the preservation program, we have prepared standard presentations as well as readable form letters answering the questions most often asked. We have instituted a public information program on the office level to familiarize each staff member with the entire program. Thus everyone can at least answer basic questions and take intelligent telephone messages in aspects of the program where he or she is not directly involved.

In attempting to dispel bad images about the program, we found that the fear of restricting private property rights was comparatively easy to allay through the means previously described. However, a sore point with many people was the fact that in past years it has taken so long to process citizen-generated National Register applications. Some took years. Others were never completed. This was at the heart of our "unresponsive" image. It had even generated adverse publicity on occasion. To solve this we revamped the National Register process so that each citizen-generated nomination will be expeditiously seen to. In FY 82 we will continue to implement this National Register system (previously described) because, on the whole, it has worked. Turn-around time from initial citizen inquiry to a review committee vote is generally less than five months.

In order to reach new groups and to expand the profile of the program, we have had information booths at various conventions and we have expanded the use of press releases. In addition, we have made each National Register Review Committee meeting a public forum on historic preservation. We have also begun giving lectures to business groups as well as historical societies.

Finally, we have attempted to bring new and important groups into the preservation movement on the local level. In registering each district we use the Chamber of Commerce or other groups identified as being important to the local economy as a means of approaching the city government. We gain the group's support first, then ask them to approach the mayor to gain municipal support. We then involve both the mayor and group in the citizens committee registration system. This operates as follows:

The Register staff works with contacts in local historical societies, mayors' offices, Junior League chapters, service clubs, etc., to generate interest in historic preservation and in a National Register district. Acting as coordinators, these local contacts recruit volunteer citizen survey committees which receive half a day's training by the National Register staff. The committee members then survey the town street by street, establish district boundaries, photograph and describe each building, and conduct historical research. This work is supervised, corrected and edited by the staff. The survey material is then compiled into a National Register nomination.



We have found that this system cultivates and recruits citizens' enthusiasm (as well as mayors) and gives them the attractive goal of a historic district designation. A successful registration effort fires their enthusiasm. With proper direction, it also gives them the sense that the hard work expended in the registration process must not be for naught. The enthusiasm is infectious and other groups are often drawn into the preservation effort.

Once registration is achieved, it is usually easy to secure volunteers to act as local preservation coordinators. Once they are trained for this new role, their job is to foster local preservation efforts, steer local businessmen through the Tax Act process, and provide technical help. We feel that this kind of day-to-day help and encouragement will be far more effective than one time workshops sponsored by the state staff. In addition, local people are the only ones who can effectively persuade local businessmen to undertake good renovation projects. They are also the only ones who can overcome the myriad doubts and fears which remain in the community even after the goodwill of the city has been earned.

### 3. Survey

The primary need in our comprehensive standing structures survey is to make it more useful in the review and compliance process and the National Register program. Its deficiencies in these regards are as follows:

- a. Only 3/8 of the state is being comprehensively surveyed due primarily to dwindling funds and the lack of local matching agencies.
- b. The comprehensive survey information has missed a few areas.
- c. In addition, the survey forms are not always prepared at a level where they contain sufficient information to make a valid determination of eligibility.

The last two problems have been largely solved through increased monitoring of the field surveyor and through holding periodic retraining sessions during which their recent submissions are evaluated and discussed.

The first problem is extremely difficult to address. It is our opinion that, given the almost certain prospect that funding will continue to be severely limited, and given that matching agencies will continue to be impossible to find, the most effective immediate solution is to seek non-traditional, private sources for the survey effort in those areas not being comprehensively surveyed. To this end, we have embarked upon a pilot project in which volunteers have been recruited to survey Franklin Parish. We hope to develop a methodology by which we will be able to run volunteer surveys of acceptable quality in other parts of the state.

### 4. Registration

Experiences of the past few years led to the identification of major areas of critical need concerning the National Register process.

- a. There was a need to solve the problem that most of the Register staff's time was being spent pursuing citizen-generated nominations.

- b. There was the problem that minority history was underrepresented on the Louisiana Register list.
- c. There was the problem that the trickle of mainly single site properties being listed on the Register was in no way representative of what ought to be registered according to any rational priority system.

In response to these identified problems we established the following broad objectives:

- a. To formulate and implement a rational policy on dealing with citizen-generated nominations.
- b. To boost minority participation in the Register program with attention to the most significant properties.
- c. To formulate and implement a simple and rational policy regarding nomination priorities.

In forming our policy on dealing with citizen-generated nominations, we did not feel it was proper to refuse to process individual Register applications from the public. This can generate much bad feelings about the State Preservation Office as well as adverse publicity. Moreover, in many cases individual applications are our earliest dealings with preservationists in a given community. A few successful single nominations can embolden them to try for a district. Conversely, refusing to consider their nominations because they don't conform to our "priorities" can stifle a potentially fruitful relationship.

However, the growing popularity of the Register program has generated an increasing flow of single property applications from the public. They take a lot of time, but again, because we are a public service agency, we feel that it is improper to either refuse to process them or to put them on some eternal "back burner." To diminish this problem we devised and are implementing a system of form letters, check lists and logging sheets by which single site applications will practically process themselves. The applicant must submit all nomination material from photographs to USGS maps before his application is reviewed by the staff. We then make a brief inspection if necessary and rework the submitted material into a short but finished nomination. Because of this system, much more staff time will now be available for high priority district work.

In order to boost minority participation in the Register program, we felt that it was important to have the most expert guidance possible in soliciting nominations. To this end we have entered into a cooperative agreement with President Jesse Stone of Southern University (which is predominantly black). The University will sponsor a "blue ribbon" committee of black history scholars whose job it will be to comb the state and suggest properties for nomination.

In formulating our nomination priorities, we determined that intricate and elaborate systems which distinguish, for example, between regional or state significant properties are counterproductive. The system should be simple and it should be quantitative as well as qualitative. In other words, it should be directed towards making a meaningful "dent" in the approximately 30,000+ eligible buildings in the state.

We have determined that the highest registration priority is historic districts, particularly ones with significant commercial resources. Multiple property nominations such as districts and thematic and multiple resource nominations are far more efficient and comprehensive as preservation tools than single site nominations.

There are only about 70+ eligible historic districts in the state. The present system of district registration produces between eight and ten district nominations per year. If we approach Louisiana's cultural resources through multiple property nominations and historic districts, recognizing the bulk of the state's heritage becomes an achievable goal.

#### LOCAL GOVERNMENT PROJECTS

Pursuant to P.L. 95-515, 10% of our planning estimate is being reserved for local government programs.







## PROGRAM OVERVIEW

a. BACKGROUND

The New Mexico historic preservation program was established in 1969 with the passage of State legislation which, in the words of the law, was intended to be "consistent with, but not necessarily limited by, the Historic Preservation Act of 1966". However, no attempt was made until 1974 to establish a permanent staff representing the major disciplines associated with historic preservation. The first five years of the program were devoted mainly to some of the requirements of the State law, primarily site identification, State tax benefits, and permitting and review of archeological investigations on State lands.

The program hired an architectural historian and a historic architect in 1976 (an archeologist and a historian had constituted the staff up to that time) and began, in response to increasingly stringent Federal requirements, and in further response to identified State needs, to establish the programs which now exist.

These programs are: preservation planning; archeological survey; architectural/historical survey; public education; acquisition, restoration, and rehabilitation of registered properties; tax assistance; and compliance.

b. MAJOR ACCOMPLISHMENTS

Major accomplishments in Federal fiscal 1981, which may be useful to other States or in the Federal budget process, include:

- 1) Review and update of the New Mexico Historic Building Inventory Manual. In cooperation with appropriate professionals, non-profit organizations, corporations and agencies, the Historic Preservation Bureau has reviewed and reissued the Manual, and the basic recording form, to create a basis for

comparable statewide architectural/historical data. The Bureau has also promoted the use of the Manual and recording forms among municipalities and other subdivisions of government, Federal agencies in particular, in which archeological expertise is more common than a knowledge of historic architectural resources.

2) Publication and dissemination of Prehistoric New Mexico: Background for Survey. This study embodies a theoretical reconstruction of New Mexico's prehistory, a discussion of cultural process and succession, overviews of five major physiographic units comprising the State, a review of the state of archeological knowledge and theory in these areas, a review and discussion of all sites listed on the State and National Registers, an analysis of land ownership in each physiographic area, an analysis of "undersurveyed areas", recommendations for survey and registration, a discussion of the methodology of recording and analysis, and a discussion of threats to resources. It is now being disseminated to agencies, corporations, organizations and individuals. Requests for proposals for future site survey, identification and registration are being solicited in conformity with the study's recommendations. This study includes a cost analysis of a statewide archeological sample survey.

3) Continuing automation, storage and retrieval of archeological site data, and of surveyed areas. Refinement of format and method.

4) Testing of automated Statewide data sharing network, with a cost analysis. A trial program of automated significance evaluation.

5) Statewide reconnaissance of man-made landscapes; analysis of this type of resource; proposals for future investigation.

6) Review of legal mechanisms for preservation in New Mexico, embodied in a full-scale report, with recommendations for future initiatives.

7) Investigation of energy conservation and maximizing energy efficiency in historic properties, with recommendations which are usable by the general

public.

8) Development of a program of review, including survey, evaluation, registration and protection, of cultural resources within surface mining areas.

9) Development of a program of review of rehabilitation projects.

c. ASSESSMENT OF PROBLEMS AND NEEDS

1. Survey. The principal requirements for the survey program are for a coordinated system which will produce comparable data statewide; an adequate data storage and retrieval system; and adequate funding to complete a statewide architectural/historical inventory as well as a representative sample of prehistoric resources.

The first two requirements have been met satisfactorily, though further analysis is anticipated. The inventory Manual is updated as required and serves as the basis for the architectural survey state-wide. In addition, aerial reconnaissance may provide the basis for inventory of isolated areas. The manual data systems are being refined while a computerized form ("Historic Architectural Resources Management") is being developed and tested.

The third requirement - an adequately funded and stable program through which to complete the surveys - is lacking. We will attempt to meet this need by establishing, for the first time, a State historic preservation fund; by demonstrating the need for continuing federal support; and by increasing technical assistance to subdivisions of State government capable of performing some aspects of historical/architectural survey. Adequate survey of prehistoric resources, however, must continue to be supported directly; the complexity, number and physical remoteness of these resources inhibit the use of amateurs and volunteers.

2. Registration. Preparation of National Register nominations has proceeded without delay; however, a major problem has emerged with the virtual shutdown of the National Register. The acceptance of regulations for owner notification should result in the re-activation of the National Register, but a sizeable

backlog of nominations may well result in registration delays. Delays are exacerbated by the variable basis for National Register listings, returns, and rejections.

The New Mexico program will continue to identify, review and register properties at all levels and under all criteria of National Register significance, and to consult with federal agencies to identify eligible properties on federal lands. The general failure of federal programs in New Mexico to establish adequate programs of identification and registration is a continuing problem which we will attempt to deal with by agreements and consultation with these agencies.

3. Protection. Problems in this program element fall into the following categories: Federal agencies which have inferior capability of protecting significant sites, and/or an insufficient understanding of the compliance process; inadequate means to protect State-owned cultural resources; rapid development, land modification and other disruptive influences, such as commercial vandalism, threatening privately owned cultural properties; technical problems of preservation.

Approximately one third of New Mexico is Federally owned or controlled, and Federal authorization, permission and licensing goes far beyond the boundaries of actual Federal ownership. Most of the major Federal landholders have basic problems in their cultural resource programs, including: lack of adequate cultural resource management staffs and personnel trained in police work, who can patrol the large and remote areas in question, and an imperfect understanding on the part of mid and upper-level managers of cultural resource management responsibilities. No Federal agency in New Mexico is carrying out a general program of inventory and registration of significant cultural properties, although several, including the National Park Service and the Bureau of Land Management, are preserving and/or developing certain cultural resources.



Most of New Mexico's State lands are lands held in trust by the State Land Office for certain beneficiary institutions, mainly institutions of higher learning. State Land Office policy does not require comprehensive cultural resource surveys on trust lands, nor survey prior to development. Since most of the State lands are held in trust by the State Land Office, this policy affects a significant portion of the cultural resources in New Mexico.

New Mexico's significant energy resources, including approximately one sixth of the world's uranium and extensive strippable coal, are causing rapid development and land modification in certain areas. The State's population is growing rapidly, both as a result of an influx of job-seekers and the general shift in population to the southwest and west. Growth, development and land modification constitute both a direct and indirect threat to archeological resources (land modification, vandalism) and to historic/architectural sites, many of which have limited potential for adaptation to contemporary use.

The technical problems of preservation are generally associated with older, fragile structures with limited potential for adaptation. (Large adaptable commercial structures in New Mexico generally do not date much earlier than 1880, or the beginning of the railroad period; 19th century residential structures in basically sound condition present fewer problems.)

This general sketch of legal, practical and technical problems in the protection of cultural resources is not, of course, a balanced picture, since it leaves out successes and solutions.

Any discussion of how these needs will be met necessarily follows the terms of the Historic Preservation Act Amendments of 1980, specifically Section 201(b)(3), which covers the responsibilities of the State Historic Preservation Officers.

First, the State program must continue its comprehensive cultural resource survey, keeping certain ends in mind. The architectural/historical survey



must be coordinated with municipal and county governments to the greatest possible extent, and must depend on such governments for matching, assistance in public education, and assistance in fieldwork. The archeological survey must be closely coordinated with Federal agency programs for data storage, management, and retrieval, and with such surveys as Federal agencies can perform. The State program must assume the responsibility of registration of significant publicly owned sites to the extent possible. The State program must provide leadership and coordination in developing survey methodology, including field and computer recording formats. The comprehensive State historic preservation plan, including technical and theoretical aspects of architectural/historic and archeological site recording, must be disseminated and explained by the State. The State's site information and procedural requirements in 36 CFR 800 consultations must be made consistent with the plan.

The State program of federal assistance must be organized to further statewide survey and registration as described, and to carry out the other functions listed above: planning, education, restoration and rehabilitation, tax assistance and compliance. Increasing emphasis must be placed on developing legal mechanisms (e.g. ordinances) for preservation, immediately upon concluding surveys of municipalities, counties, or other subdivisions of government. This means that contracts with subgrantees must include, in addition to the performance of the survey, public review of results, and drafting of ordinances, easements, etc.

Advice and assistance to local governments, Federal and State agencies will cover the general areas of survey, registration and protection (both actual restoration and development, and legal protection) in that order and as a single process. For example, the consultation with Federal agencies required by 36 CFR 800 will begin with a discussion of survey method as described in the State plan, with a review of field forms, computer forms,

and types of resources known in the identified survey areas. The responsibility for registration, that is, for organizing data in National and State register formats, will belong primarily to our office. Memoranda of agreement, easements, covenants, ordinances, public education, and technical assistance in preservation - i.e., the full range of protective mechanisms - will be coordinated and assisted by our office. We will continue to advise Federal agencies and local governments as appropriate (e.g., in certain HUD-assisted undertakings) according to 36 CFR 800 requirements, and will monitor agency compliance.

Our public education, information and training programs will be based on: continuing survey of individuals, interest groups, organizations and subdivisions of government to determine their need for information; dissemination of information to all these groups through brochures and personal correspondence; site visits; lectures and appearances; financial support of or actual participation in workshops, including preparation of manuals, brochures and reports.

Assistance to local governments to develop local preservation programs and to obtain certification of those programs will be based on surveys by the localities. The unit of local government responsible for survey will also be contracted to develop a local preservation plan and to prepare draft ordinances. State office personnel will be directly involved in, and will oversee, survey and development of local preservation mechanisms.

#### d. SUPPORTING ACTIVITIES

The program will continue its statewide survey of prehistoric and historic resources, carrying out inventories of communities and thematic and multiple resource surveys of prehistoric resources in rural areas. The program will continue to support computerization of all historic and prehistoric site information with an eye to rapid retrieval and analysis, primarily for management purposes, but also keeping research interests and questions in

view. Survey will include testing and analysis, particularly of prehistoric sites, as required to confirm dates, site affiliations and other data essential for resource management. Continuing statewide survey, analysis, and review and improvement of survey methodology, will be carried out mainly under professional services agreements and through contracts with non-profit organizations, corporations and subdivisions of government, but the program staff will be involved in all aspects of work.

The program will prepare, and contract for the preparation of, National Register nominations, with emphasis on historic districts and thematic archeological nominations. Historic district nominations will involve local units of government, and will include consideration of legal mechanisms for preservation of the resources identified.

Major protection activities will include: development of cooperative agreements and procedures with Federal agencies; public education, including publication of survey results and manuals on technical aspects of preservation and adaptation of structures; coordination with Federal and State legal authorities in detection and prosecution of vandalism and site destruction (our specific legal authority for such activity is created by State law); coordination of State agency activities in the field of cultural resource management as provided by law; technical assistance to owners of registered properties; coordination of State and Federal tax programs, including on-site visits and assistance to owners in completing required forms and reports; cooperation with units of local government in development of ordinances and other legal mechanisms for preservation.

Pursuant to P.L. 96-515, 10 percent of the planning estimate is being reserved for local government programs. We will expect further instructions concerning the 10 percent earmarked for local governments after the enactment of our FY 82 HPF appropriation.







## OKLAHOMA

## PROGRAM OVERVIEW

Retrospective

While the last several months have brought many uncertainties regarding the Historic Preservation Fund Program, the Oklahoma State Historic Preservation Office has had success in several areas. The Fiscal Year 1981 Annual Work Program set forth an ambitious list of activities for the State Historic Preservation Office staff, and major accomplishments and improvements have been made in the areas of program management, resource protection, and survey efforts.

During Fiscal Year 1981, the management of the Oklahoma State Historic Preservation Office was greatly improved. The professional staff is now all in place, and the organization of this division within the Oklahoma Historical Society is firmly established. With the decision of the Governor to continue the practice of naming the Executive Director of the Oklahoma Historical Society as the State Historic Preservation Officer, stability and continuity now exists for the program. Furthermore, management of the financial aspects of the program were greatly improved during the past year. A procedure for subgrantee requests for reimbursement, as well as accountability for expenses for expenses of the State Historic Preservation Office was established. The Federal audit of the program conducted in June 1981 revealed the success of the efforts to improve program management.

Further, the Oklahoma SHPO developed a plan for the next ten years of our program. It involved conducting a needs assessment on a statewide basis, as well as consultation with professionals. An outline of activities considered that this broad outline will enable us to better carry out the responsibilities and goals of the National Historic Preservation Act, as amended.

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Secondly, the resource protection aspect of the program was improved. One full-time staff person is assigned to handle all review and compliance activities in consultation with the rest of the staff. A system of maps showing exact locations of all inventoried sites was updated. Also, a more accurate system of recording applications received, comments made, etc. is also in effect. This all serves to make our response time more prompt and provides the maximum amount of time to the applicant if significant resources may be impacted.

Another important development in resource protection is that of a set of standards for archeological reports produced within the state. The State Historic Preservation Officer invited representatives from all phases of the archeological community in the State to devise a set of standards acceptable to all. These provide the SHPO a means of making more intelligent decisions in cases involving archeological resources.

The third area in which progress was significant is that of survey. The Oklahoma State Historic Preservation Office is nearing completion of its statewide comprehensive survey. Fiscal Year 1981 was one of the most productive years. A total of 23 counties were surveyed through contractual arrangements with Oklahoma State University, Department of History and Department of Geography and the Museum of the Great Plains. The finishing of this phase of the program represents three-fourths completion of the entire statewide survey. Also, a special thematic survey was undertaken. Through a contractual arrangement with Oklahoma State University, Department of History a Black Heritage survey is underway. It is estimated that at least twenty National Register nominations will be the end product of this effort.

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Another significant survey project involves developement of a historic preservation plan for the Boley Historic District. This project is being conducted through a subgrant to the City of Boley, which has retained the services of the Afro-American Institute. The end product will provide a guideline for the preservation and revitalization of this National Historic Landmark District.

In summary, the Oklahoma State Historic Preservation Office has completed a busy year with several successes. With the delay in appropriation of Fiscal Year 1981 funding and the uncertainties of rescision, some activities have been cancelled and a few delayed. It is expected that, with the exception of those Acquisition and Development projects cancelled as a result of the rescision, all planned activities will be completed within the time aloted.

#### Prospective

The Oklahoma State Historic Preservaton Office's Fiscal Year 1982 Annual Work Program sets forth proposed activities that will enable the staff to meet needs and solve problems in the areas of survey, registration, and protection. Thos most important issue to Oklahomans at this time is energy exploration and development. The economic growth resulting from these activities is tremendous, and many communities are experiencing very rapad growth. With such expansion, concern for sultural resources increases. It is a primary goal of this office to identify properties within the target areas of energy development and strive for their protection. Another issue warranting attentio- is the involvement of the minority community and handicapped persons in the activities of the Historic Preservation Program.

The first program element to be addressed is that of survey. As was dis-

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cussed in the retrospective, the Oklahoma SHPO is nearing completion of the comprehensive survey of the State. This will be completed by the end of FY 1982 if Federal funding is received as estimated. Supporting activities include subgrant contracts to Oklahoma State University, Department of History for survey of eleven northwestern counties, to Oklahoma State University, Department of Geography for six northeastern counties, and to the Museum of the Great Plains for two southern counties. These projects will identify historically and architecturally significant properties in areas where virtually no effort has ever been undertaken to identify cultural resources. An estimated 200 individual National Register nominations, five district nominations and one thematice nomination will result. The search for oil and gas is proceeding at an intensive level in western Oklahoma, and the survey by Oklahoma State University, Departmetn of History will locate resources within that area.

Two other subgrant contracts will be vital to resource indentification. The University of Oklahoma will conduct both projects. The first is a survey of James Fork Creek in eastern Oklahoma where the most intensive effort in the State for development of coal is beginning. The second is a survey of Quartermaster Creek in western Oklahoma in the center of the natural gas exploration activity.

In an effort to foster preservation efforts in local communities, the staff will conduct workshops on revitalization of downtown commercial districts. Topics for discussion will include establishment of a historic district, the use of preservation ordinances, and the use of tax incentives. When regulations are provided, the State Historic Preservation Office will participate in the certified local governments program. At this time only three communities within the State have preservation ordinances. It is

estimated that with concentrated efforts on the part of this staff that three additional local ordinances could be adopted by Oklahoma communities within Fiscal Year 1982.

Second, the registration program element is addressed. The staff will concentrate its efforts toward nomination of districts to the National Register of Historic Places. The increased tax benefits have already generated a great deal of interest in the adaptive reuse of buildings across the State. As we have only a few commercial districts included in the National Register, an increase in such listings could provide the necessary incentive for redevelopment of numerous structures that might otherwise be lost. The staff will conduct workshops in several communities to explain the district concept and assist citizens in preparing their National Register nominations.

There is a real need to provide accurate and complete information on tax incentives for historic preservation to the business community and general public. The staff will conduct workshops dealing specifically with this topic in those communities which already have registered historic districts. Staff members will consult with property owners in development of Part 1 and Part 2 of the Historic Preservation Certification Application (an estimated twenty such certifications will be reviewed).

The third program element to be addressed is protection. The staff will continue a timely review and comment procedure for all applications for projects with federal involvement. Two major activities planned for Fiscal Year 1982 include the computerization of all National Register files and Oklahoma Landmarks Inventory data. Also, the initiation of an RP3 for Oklahoma is planned.

In summary, the staff of the Oklahoma State Historic Preservation Office will continue to conduct survey, registration, and protection activities as



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outlined. The staff will strive to involve the public to the greatest possible extent in preservation of our State's rich heritage. A special effort will be made to provide access to the program to the handicapped through work with the Oklahoma League for the Blind and other organizations. Furthermore, an effort will be made to involve minority group members in the program. The program described above and in the other sections of the Fiscal Year 1982 Annual Work Program are considered to be of primary importance to the State and to deal in the most effective way possible with those issues currently facing the State.





### Program Overview

Fiscal year 1981 was very productive for historic preservation in Texas. In administering the National Historic Preservation Act of 1966, as amended, the State Historic Preservation Officer is pleased to report several major accomplishments.

The statewide survey of cultural properties continued with 6 regional and city surveys carried out under contract, including documentation of important concentrations of historic sites in Hillsboro and the San Antonio area. The staff conducted surveys for purposes of identifying particularly outstanding sites and filling gaps in the survey record of selected areas in Brownsville and Salado, both of which produced multiple resource nominations. A staff archeologist prepared nominations of an archeological district and several individual mound-village sites.

A total of 34 properties were passed by the State Board of Review. These included major multiple resource nominations (such as Houston Heights with 107 properties) and thematic nominations (such as early churches with decorative interior painting, which included 15 structures). Assistance in the form of documents, guidelines, and advice was given to several hundred individuals seeking to have properties listed on the register.

Encoding of data on cultural properties from various inventory systems into a uniform computerized system continues, with all recorded sites in about 50 counties having been completed to date. The computer manual for this system has been printed and distributed to those who will be utilizing the data for management and research purposes. This computer inventory will include structures of architectural significance, historic and prehistoric archeological sites, historic shipwrecks, and engineering sites.

We are particularly pleased with progress made during the fiscal year on the comprehensive statewide preservation plan. An interdisciplinary workshop in January brought together 32 individuals representing architecture, architectural history, archeology, history, planning, folklore, cultural geography, and the state legislature. The conceptual framework for a state preservation plan was developed during the workshop, and a draft of this overview plus two sample study units were submitted to the National Park Service, Division of State Plans and Grants. We feel the German-Texan study unit is of special merit.

Twenty-four preservation grants totaling \$293,600 were awarded to historic projects; together with matching funds, these resulted in at least \$781,544 in total funds being applied to these outstanding historic properties during the fiscal year. Particularly impressive were the restorations of the 1866 Wesley Brethren Church in Austin County and the Stearne Fountain in Jefferson, a study of Comanchero sites in the Panhandle region, and a plan for adaptive reuse of Evans Industrial Hall on the Huston-Tillotson College campus. A backlog of completion reports on previous grant projects was reduced, with 25 reports being finalized and distributed.

County courthouses of the 19th century are some of the most important public buildings in Texas. New federal jail standards are requiring most counties to make major modifications or replace their jails altogether. As county jails have traditionally been placed on a portion of the courthouse square, many courthouses are being heavily impacted. The SHPO staff has been working with about 30 counties in FY 81 to reduce the effects of new jail facilities on national register structures. Adaptive reuse, compatible new construction, relocations of new facilities, vegetative screening, and other such techniques are being investigated to reduce the impact.



To encourage participation of various ethnic and minority groups in the preservation movement, the SHPO cosponsored the Texana Conference on the topic of the Cultural Heritage of the Plantation South. The conference was held in Jefferson and was attended by 225 participants representing several states. In addition, the staff assisted local citizens in surveying a Norse settlement in central Texas for a 38-element multiple resource nomination and continued gathering data on Black communities in east Texas. Funds were requested to evaluate individual properties in the predominantly Black Fifth Ward N.R. district in Houston. Grant funds in the amount of \$95,840 went to 10 projects emphasizing ethnic diversity. The identification of study units related to ethnic groups, such as the German-Texan and Afro-American study units, is expected to guide and influence future cultural resource management and to assist in involving ethnic groups at the local level.

FY 1981 saw the conclusion of two grants under the maritime matching grant program jointly sponsored by the HCRS and the National Trust. The two maritime grants awarded to the TAC/UW section in FY 1980 were for the keel of the San Esteban and for the Galveston magnetometer survey. The grant for the keel of the San Esteban was for a study by Richard Steffy and his students in ship reconstruction and for continued conservation. The Galveston magnetometer survey was to locate shipwrecks and aid in their protection in an area of intense construction activity. A third maritime grant project, the restoration of the barque Elissa is expected to be completed in another eighteen months, thus forming the nucleus for the Gulf Coast's only maritime museum.

In encoding site data for rapid retrieval, first preference is being given to coastal counties because of the tremendous impact from increased petroleum development in the coastal zone. Secondary priority goes to encoding cultural resource data in the central lignite belt counties because of anticipated

surface mining throughout this region in coming decades.

In the area of comprehensive statewide planning we now have the following tools:

1. A master set of U.S.G.S. 7.5' maps showing locations of all current National Register listed and eligible properties and known archeological sites. Since March, all projects with federal involvement have been plotted on these maps to graphically show impacts.
2. Microfilm records of sites from institutions and archives all over the state.
3. A computer program for cultural properties and initial encoding of data from 50 counties.
4. An initial definition of study units compiled by an interdisciplinary team.
5. A microfilm archive and index of archeological reports.
6. Extensive photo archives of architectural properties, historic sites, and archeological sites around the state.

Archeological reports resulting from federal and state regulated projects are often produced in limited quantity and receive little or no distribution to the scholarly community or to the public. During FY 1981 the SHPO completed microfilming and indexing 746 additional such documents and is making the index and film available to libraries, individuals, and corporations at cost of reproduction. This second microfilm volume makes federally generated archeological data more widely accessible.

Information on historic preservation was distributed to the public in many forms: list of N.R. properties in Texas, Secretary of the Interior's standards, archeological publications guidelines for completing N.R. nominations, computer program for cultural resources, technical publications, The Medallion and other

newsletters, preservation films, and the traveling exhibit of shipwreck antiquities.

In FY 1981 Texas was one of 6 states selected for the pilot Main Street program. \*Initial work in cooperation with the elected officials and other civic leaders in 5 diverse cities (Hillsboro, Eagle Pass, Seguin, Navasota, and Plainview) has resulted in low-interest loans and private grants for preservation purposes. Over one million dollars in restoration projects are underway, with 9 near completion and 10 more in progress. Another 114 cities applied for Main Street designation in FY 1982, and 5 will soon be selected to join the existing 5 towns. The Texas Historical Commission provides managerial expertise and technical conservation assistance while surveying the communities and helping establish preservation priorities. \*Continuation of this program emphasizing self-help preserves and revitalizes many communities which otherwise would be unable to obtain comprehensive professional assistance.

During the coming fiscal year the SHPO anticipates several problems. Many private properties passed by the State Board of Review are still awaiting guidelines for owner concurrence before they can be forwarded to Washington. This is causing an increasing backlog. \*Decreased staffing and increased demand for preservation services will require us to strictly limit the number of nominations brought before the Board and will significantly reduce the number of technical preservation consultations. Uncertainty concerning federal preservation funding is causing morale problems among our hardworking staff and frustration in a dedicated preservation community.

Project review, required by various statutes, continues to be a heavy burden for our small staff. We also have a deluge of requests concerning tax act certification under the Tax Reform Act of 1976.

While we recognize the decreasing participation of the federal government in historic preservation endeavors in general, we feel it is imperative that federal funds be available for another year to permit the states and private sector to adjust to the void that is being created. Some critical elements in the preservation planning process, such as \*encoding of existing survey data for quick retrieval, \*formulation of a sample regional management (RP3) plan for the Galveston-Houston area, and \*the surveys in the central lignite belt, have been developed over several years with Historic Preservation Fund monies, and are close to completion. Federal assistance now is crucial to their finalization and the subsequent development of cultural resource management in the state as a whole.

To minimize the impact of the reduction in federal participation in our state, we just recently secured from the state legislature a \*new state-funded grant-in-aid program beginning September 1, 1981. Furthermore, we are investigating a \*fee system for possible application to the registration process, review of Tax Act projects, and cultural resource management consultations. In combination, we are hopeful that this new program and this new procedure will allow us to continue, without disruption, our usual services with little or no federal assistance if necessary.

# Mid West Region



Illinois  
Indiana  
Iowa  
Kansas  
Michigan  
Minnesota  
Missouri  
Nebraska  
Ohio  
Oklahoma









## ILLINOIS HISTORIC PRESERVATION FUND PROGRAM FY '82: Program Overview

Part I: Restrospect

Fiscal Year 1981 was not an altogether auspicious year. Between rescissions and moratoria on nominations and promulgation of essential regulations, it was impossible to meet a number of objectives included in the annual plan for that year. For example, there were no acquisition and development grants awarded because of the rescission, and because there were no regulations issued to implement the Historic Preservation Act Amendments of 1980, we made little progress in the registration program element. Survey and protection were not greatly affected, however, because they were included in our survey and planning component which was obligated prior to the rescission. Our survey accomplishments are discussed below. There will also be a discussion of the registration element as one of the highlights of the year not because we could not meet our objective, but because we feel that any accomplishment there was a genuine achievement in consideration of the circumstances and because our method for dealing with the registration crisis may be instructive to other states should the situation continue or recur in the future.

Since the purpose of the narrative overview is to highlight the major accomplishments of the year, it is not necessary to dwell on the constraints that limited them. It might, nonetheless, be noted that any progress we made was achieved with a sixty percent reduction in Historic Preservation Fund assistance from Fiscal Year 1980. This reduction was a result, in large part, from an annual application prepared from confusing, confounding, and convoluted guidelines, and not the result of the evaluation of our past performance.

Notwithstanding these adversities, we were able to hold the line by maintaining our full staffing level and even laying the basis for new program initiatives that are to be undertaken in the coming fiscal year through some minor shifting of job responsibilities. The diminution of funding support and other troublesome encumbrances did not dull our eagerness for adapting to new realities and forging ahead with our historic preservation program. Some of the more interesting achievements of the closing year are highlighted below.

In the survey program element, Illinois has advanced its ambitious and rather innovative method and committed itself deeply to an investigation of the cultural resources in the rural areas of the state.

In order to appreciate the significance of this progress, a brief history of our survey is appropriate here. By 1975, the state had compiled an inventory of cultural properties at a minimum level of documentation that included over fifty-four thousand places of architectural interest by driving every street in every community with a population in excess of five hundred, almost ten thousand properties possessing significance through their historical associations located through extensive literature searches and efforts at public involvement, and information on over twelve thousand archaeological sites obtained through contracts with over a dozen universities. Between 1976 and 1979 we experimented with a number of methods for conducting a rural survey, and at the end of the period, finally settled on a method greatly influenced by cultural geography as well as history and architectural history. That method calls for an intensive study of the history of a county followed by a survey that involves driving every road in

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the county, and photographing and mapping every building or contrivance erected by man prior to 1945.

Although we established this procedure in fiscal year 1980, we took it one step further in 1981 by sub-granting historic preservation funds to two county planning commissions to undertake a rural survey in a manner prescribed by the SHPO. The result, combined with the survey the SHPO undertook directly with staff, was the addition of 8,435 sites in five counties encompassing an area of 2,483 square miles. Together with the rural surveys completed before this year, Illinois has surveyed the rural areas of thirteen of the 102 counties in the state including the suburban counties surrounding Chicago and a number of downstate counties slated for extensive coal mining development.

The impact of these efforts will have a profound impact on the efficiency and expedition with which planning will be carried out by developers proposing new construction, highway engineers designing new roads, and energy corporations devising new schemes for extracting resources from the earth.

In addition to facilitating environmental review, the survey data is closely tied to the registration program. Clearly, not all of the tens of thousands of properties included in the data collection are eligible for listing in the National Register. There are probably no more than four thousand such places in Illinois. But, by cataloguing and cross-referencing site information it is possible to establish the normative case and either identify or extrapolate from the data those places that possess sufficient merit to warrant inclusion in the Register.

Another accomplishment in the fiscal year relates to the administrative function of the survey program element. Taking a cue from two other midwestern states and with the approval of the National Park Service, we executed an agreement with the Illinois Department of Transportation to utilize their state expenditures on archaeological surveys as part of Illinois' matching share for Historic Preservation Fund monies. This arrangement has resolved the perennial problem of "coming up with the state match" and simplified cost documentation dramatically.

When less than three months of the new fiscal year had elapsed we were faced with new problems in regard to our registration program--namely, we were not permitted to submit any nominations to the Keeper as a result of the law passed in December. With a keen interest we noted the Keeper's suggestion that the state shut down their registration program and refrain from holding state review board meetings; with a keener interest we noted the demands of our constituents (and a state law that obliges us to hold meetings) to maintain open access to the National Register. It became clear that, despite the uncertainty in Washington, the program must be consistent, continuous, and stable if it is to possess the merest shred of credibility. With that notion in mind, we persevered in accepting nomination forms from the public and those which our own staff generated and presented them at the regularly scheduled state review board meetings. We did not, however, permit the submission of any historic district, thematic, or multiple resource nominations even though we recognized that a number of them were waiting in the wings. This ad hoc policy has precluded the accumulation of a large backlog of nominations, provided a stable program for the public, and obviated the spectre of marathon review board meetings in the period immediately following the eventual promulgation of regulations. During the fiscal year we



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ere able to send nine nominations to the Keeper either as public buildings or other properties submitted prior to the December cutoff date. There are presently thirty nominations that the review board and SHPO have considered and are now waiting to be sent to the Keeper. There is still one review board meeting scheduled for the remaining portion of the fiscal year at which there will be approximately twenty nominations for board action. Sponsors of historic district, thematic, and multiple resource nominations who were excluded from the process have been very patient.

One of the thematic nominations that was listed during the year is rather curious and worthy of mention here. It shows that the National Register program can make a genuine contribution to historical knowledge that goes beyond historic preservation. The nomination for the American Women's League Chapter Houses contained information on a brief chapter in United States women's history that had been hitherto unknown. Consultation of many women's history publications and inquiries to scholars in the field turned up absolutely no information on this nationwide enterprise begun by a St. Louis publisher at the beginning of the twentieth century. The woman who prepared the nomination currently has plans to write a stage musical based on her National Register research.

In the protection program element one of our more notable accomplishments was the establishment of the Illinois Main Street project. When the National Trust declined to include Illinois in its own Main Street program, the Illinois Department of Commerce and Community Affairs in cooperation with the SHPO decided to undertake such a project without the benefit of the Trust recognition. By providing sub-grants to five communities throughout the state, the SHPO has made this two-year project viable. These communities, which include a Chicago suburb, a rural county seat, an early state capital, and two medium sized downstate cities, have chosen historic preservation as the principal tool in the downtown redevelopment schemes. A number of other states have been in contact with us and expressed an interest in doing something similar.

The possibilities for promoting such an approach are enormous, especially in light of the current administration's proposal for block grants to the states. It is an ideal project for Small Cities funding; and, with block grants, SHPOs can work closely with their state's community development agencies to tailor similar Main Street projects to their own needs.

Besides the improvements of management techniques employed in the SHPO office, there is one final accomplishment to be pointed out. Because of unstable budget conditions on both the federal and state level, we decided that we would begin charging a subscription fee for our publications. For the price of five dollars for one year (nine dollars for two years), subscribers receive six issues of our newsletter, the annual calendar of preservation events, and one technical preservation publication. Prior to the fee requirement there were over eight thousand names on our mailing list. When the first paid issue came out, that number had dropped to two thousand, which included about four hundred and fifty complimentary subscriptions. Although that figure is only one-fourth of the previous distribution, it is much higher than we anticipated and has generated enough revenue to cover the cost of printing the newsletter for at least one year. Although subscriptions arrive at a steady rate, we have planned an advertising campaign for late fall.

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The final accomplishment in administration has been the way in which we met our responsibilities for accountability as prescribed on page 2-2 of the Historic Preservation Fund Grants Management Manual. Our achievements are evidenced by the following indicators:

1. The state's obligation and expenditure rate.
2. The results of the last several external and internal fiscal and program audits.
3. The results of the Title VI on-site Compliance Review.

The role of the Department of the Interior had both positive and negative aspects. On the positive side, the Title VI Compliance Officer's comments and recommendations were very constructive, the Letter of Credit Regional Disbursing System enabled us to expend 89% of our allocation as of the end of the fiscal year, and the suspension of certain limitations on the state's use of FY '81 obligations, which will allow greater flexibility in transferring funds between Survey and Planning and Acquisition and Development. On the negative side, delays engendered by regionalization of HCRS slowed down the day to day routine, no follow-through on the issuance of guidelines such as open project selection and the ten percent pass-through to local governments hampered planning, inconsistency in Grants Management Manual interpretation with respect to obligational authority on previous years' funds created confusion, and lack of communication between HCRS regional office and Washington resulted in loss of time and inconsistent interpretation of policies and procedures.

Part II: Prospects

When the President signed the Historic Preservation Amendments into law many preservationists desecrated the provisions for owner consent and the intrusion of the appeals process into the registration program. When the succeeding administration threatened severe budget cuts affecting historic preservation the hue and cry was raised again. These two factors have done much to belie the genuinely positive opportunities available to the preservation movement. In essence that law laid the basis for a shift in emphasis from a state-federal relationship to a state-local relationship as the fulcrum in the preservation movement.

In general terms, the principal needs of the state at this time include the institutionalization of programs aimed at this new relationship. The expanded role of local governments in registration, and the pass-through of ten percent of the state's allocation, will have a tremendous impact on the future of the whole program. One of the chief tasks in the coming fiscal year is, then, developing and employing new mechanisms to implement the new law and regulations, when the latter become available.

At the same time there is a great deal of continuity in the program: the National Register administered by the federal government, grants-in-aid--as

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uncertain as that may be--administered in the same basic manner, review and compliance through the National Park Service and the Advisory Council, etc. These established institutions are not without their own difficulties, which will also be identified and addressed.

The greatest continuity persists in the three basic program elements. The following pages identify problems and needs in each program and offer some solutions within the context of the Historic Preservation Act Amendments of 1980.

Although Illinois is farther ahead in survey work than almost every other state, work is far from complete. To begin with, the archaeological survey of the entire state is less than ten percent complete. We have estimated that it will cost in excess of \$350 million to survey the remaining areas. Since it is clear that that amount of money will never become available, we must devise ways to accomplish as much as we can with the resources at hand.

Those resources are not unimpressive. Illinois is the home of over one hundred twenty professional archaeologists--more than any other state. Most of them are engaged in Corps of Engineers' or highway projects. We have access to their products through the review and compliance process. That is, their reports and site files are passed through the SHPO office where the data is integrated into our own collection (GMR 1-SA 3) and (GMR 2-SA 3).

In addition to the professionals there are several hundred amateur or avocational archaeologists at work in the state. We recognize that the utilization of this volunteer labor force has its limitations, but they will only be utilized in a limited way by augmenting survey teams on a number of projects. These people, who are students as well as non-students, will work under the supervision of qualified principal investigators. They will go through training exercises and keep a record of their work in log books (GMR 1-SA 10) and (GMR 1-SA 11).

If this experiment of using non-professionals is successful, it will greatly help the survey of state-owned land, which has been a chronic problem for lack of funds. In Illinois there are over 120 state parks, recreation areas, conservation areas, and state forests. Each year only three or four are ever surveyed, and then normally on an ad hoc basis in regard to proposed developments on those lands. Each year five or six archaeology projects are put into the state budget but very few emerge unscathed. The need for increased archaeological survey will be alleviated through an expansion of the labor force.

Survey, as mentioned above, is one of the most outstanding features of Illinois' program. That does not mean, however, that it is without its problems. Survey is the foundation upon which the superstructure of a coherent and comprehensive preservation program is constructed, rather than an end in itself. The role of survey work in registration and protection is clearly obvious and does not need to be discussed here. The problem is not the relationship of survey to the other program elements but rather the completion of survey work in a timely fashion. Fortunately the survey work in municipalities is adequate to carry registration and protection. The completion of the rural survey is now the greatest--i.e., largest--problem.



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To begin with, the cost of conducting a rural survey in Illinois is approximately \$12,000 per county. The cost for surveying the rural areas of the eighty-nine remaining counties is a little over one million dollars, 70/30 notwithstanding. Cost is clearly the greatest obstacle. We will mitigate the fiscal impact of such a large undertaking by dividing the workload to sub-state units of government through sub-grants to regional planning commissions and county planning commissions (GMR 1-SA 4) and (GMR 1-SA 5). The SHPO will train the individuals employed in the grant projects and will prescribe the manner in which the survey data is to be collected and catalogued.

In addition to cost, time is another pressing rural survey problem. Currently about twelve percent of the rural survey is complete. At the present rate it will take ten years to finish the state at which time we will have collected information at a minimum level of documentation on an additional 130,000 sites. It is evident that developers, highway planners, and energy corporations seeking mining permits will not be inclined to wait that long. Moreover, data on such a large number of sites becomes outdated fairly rapidly and thereby diminishes the efficaciousness of the whole survey concept. The solution to the problem is to increase the rate of survey activity.

To accomplish this, we will not rely entirely on sub-grants to local governments. We propose to operate a survey of at least three counties directly out of the SHPO office, even though it will cost more than sub-grants (GMR 1-SA 2) and (GMR 2-SA 2). In order to have the results of the survey directly and immediately applicable to the registration and protection program elements, the counties selected will be either in expanding urban areas or in counties destined for extensive strip-mining. It is interesting to note that there are three counties in Illinois that will eventually be ninety percent stripped and another twenty-two that will be more than fifty percent stripped.

One of the long term effects of the SHPO-directed surveys will be the creation of a pool of experienced surveyors who will be capable of handling surveys undertaken by other agencies, units of government, or even by private consulting firms without federal or state funding assistance. The growing pool of experienced people with professional experience will also have the opportunity to function in their local communities as preservation activists.

Such a ripple effect will also help us solve the problem of keeping survey data up-dated. Local governments, local commissions, and local preservation organizations will act as monitors for sites included in the data collection. By maintaining communications with these groups, the SHPO office will learn of activities affecting historic sites more effectively. The ramifications for review and compliance, are, again, obvious (GMR 4-SA 2).

If survey is the most expensive program element, then registration is the program element least under the control of the SHPO. On one hand there is the National Park Service devising guidelines and regulations, and on the other hand there is the preservation constituency in the state demanding services and access to the Register. Although the SHPO has the opportunity to comment on federal initiatives and is chiefly responsible for interpreting them for constituency, the SHPO is still caught in the middle.

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The National Register is becoming more popular. This is happening at a time when Illinois has identified almost all of the most important buildings and historic districts throughout the state. One result is that the vast majority of the nomination forms submitted to the staff concern places of purely local significance--for example, mansions of locally prominent individuals, churches, and one-room schoolhouses which have been the subject of dubious restorations sponsored by well-intentioned civic groups. The staff has been successful in urging the state review board to fend off some of the worst ones, but the trend is definitely towards listing places of local significance.

That in itself is not necessarily a ruinous turn of events; however, we are uncertain what the Secretary's remarks about a "stricter" National Register portend. Since the issue has not yet crystallized, a discussion of solutions would be irrelevant.

While popularity increases for the National Register, the opposition to it grows as well. Although more and more developers are taking an interest in the aspects of the Register program that will enhance the success of their various enterprises, there are also many who see the Register as simply one more constraint on their options as property owners. This is especially true in Chicago where owners of very valuable property are fearful of having any alternatives foreclosed to them. There have been at least three cases wherein the owner has objected to listing pursuant to the 1980 amendments. None have been forwarded to the Keeper yet because of the lack of regulations.

The solution calls for perseverance in continual efforts to educate the public and individuals directly concerned with Register-eligible properties. We will engage in this activity through the publications program (GMR 3-SA 3), which will explain issues like local significance and integrity, through direct contact with developers and preservation groups (GMR 4-SA 11) and through educational programs directed at local landmark commissions (GMR 4-SA 2).

In the past the SHPO had one person on the staff who worked fulltime on the preparation of historic district nominations. At the end of his tenure approximately forty-five historic districts had been listed. Since that time, however, financial resources had to be shifted to other program elements and we no longer carry such a position. Although we have no "historic district person" on the staff, the forms initiated and prepared serve as excellent models for interested local governments and preservation groups sponsoring districts. Since the number of district nominations has dropped from fifteen in 1978 to about five in 1981, the staff is capable of providing technical assistance to district sponsors by thoroughly reviewing boundaries and assuring that nomination forms are complete and correct.

While the addition of conventional historic districts to the National Register is troublesome yet satisfactory, Illinois lags behind in multiple resource nominations. At this writing there is one multiple resource nomination pending SHPO signature, one that has been rejected by the state review board, one in the last stages of completion by a local government, and another sponsored by the SHPO that is in process. That is to say, Illinois has none listed. Unfamiliarity with this new format by the preservation constituency in the state, as well as



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the state review board, explains part of the reason for this insufficiency. Stiff resistance by a local government in one case is also an explanation.

In order to overcome these difficulties, we have devised a program whereby the state will produce a series of multiple resource nominations to serve as models for subsequent multiple resource nomination submissions: one from an urban neighborhood in Chicago, one from a suburb, one from a county seat, one from a down-state city, and one from a rural township. As initially proposed the SHPO would have undertaken the preparation of each type of form. As it turned out, the task was more onerous than supposed. We learned from our two attempts that it cost about six to seven thousand dollars per form and required about five months for completion.

In the interest of saving time and money we awarded a sub-grant to a local government for the preparation of the suburban form. In the coming year we are awarding a sub-grant to a county government to prepare a multiple resource nomination for a county seat and/or, perhaps, a rural township (GMR 3-SA 7). At the same time we are continuing with the completion of a Chicago minority neighborhood multiple resource nomination directly through the SHPO office (GMR 3-SA 5). Since two of the sponsors are local governments, we do not anticipate any "official" resistance.

The ultimate goal of survey and registration is the preservation of cultural resources. Therefore, protection is the bottom line in historic preservation; and as such, requires increasing attention. The various components of protection are changing through growth and include development projects, tax incentive projects, local commissions, and review and compliance, among others.

In the coming year we expect the review and compliance operation to remain stable except for one minor and one major change. The Corps of Engineers has amended their permit procedure by dropping very small projects such as boat docks and rip rap into one blanket notice. This will pose no serious problem since we have never noted any impact on historic sites for such very small undertakings.

On the other hand, the proposed changes in the Department of Housing and Urban Development's Community Development Block Grant program, which call for delegation of almost all environmental review to the local government with virtually no monitoring by HUD, will be a major difficulty. Our office reviews over sixty CDBGs each year, most of which require more than a simple A-95 review. In order to assure compliance with Section 106, we will perforce develop a system for examining CDBGs (GMR 5-SA 3). While that system is not yet fully conceived, it will undoubtedly involve direct contact with block grant recipients prior to their application and close coordination with the state Department of Commerce and Community Affairs, which has assumed a much larger role in the process in this age of block grants to the states. In addition, we have given many sub-state planning agencies complimentary subscriptions for our publications to raise our profile with them.

Besides Section 106 compliance, the Illinois SHPO has played a fairly large role in the development of the state's implementation of the Surface Mining Reclamation Act. In the past year we reviewed fourteen applications for permits under the act, but since January we have seen no activity on that front. We

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assume that this is because the mining companies are sitting back to see what direction the new administration in Washington will take in this regard.

Protection of cultural properties is also the result of rehabilitations engendered by various tax incentives. Since the passage of the Tax Reform Act of 1976, there have been 80 projects for a total investment in excess of \$120 million dollars. With the passage of the most recent tax law we expect interest in historic preservation to increase, but we do not know to what degree. The administration of tax incentive projects is a major objective for the coming year and will require considerable attention. In order to meet this challenge we must provide adequate information to the public (GMR 4-SA 11) and (GMR 4-SA 12). Since the SHPO is the primary source of information for the new laws we will prepare a completely new package on information which will be sent out in response to the inquiries we receive from all quarters of the public (GMR 4-SA 10) which have been running about 150 per year.

The single most important issue to face in the coming year involves all three of the preservation program elements: the integration of local governments into the preservation planning procedure, pursuant to the 1980 Amendments. A brief survey of the 34 communities in the state with landmark commissions, preservation ordinances, or preservation related ordinances suggests that local governments are in most cases woefully unprepared to accept the responsibilities offered to them by the law. The principal method by which these communities can be integrated is setting aside ten percent, which is almost \$41,000, of the state's total allocation for pass-through to certified local governments. The problem is that there is much to be done to prepare them.

The first step which will be taken, besides the on-going process of public education and awareness (GMR 6-SA 8), will be the establishment of a communications network that will pave the way for the creation of more solid congress of local commissions, much on the order of that which is in effect in the state of Maryland (GMR 4-SA 2).

Other steps which will be taken include cooperating with local governments in devising local ordinances (some that are already in effect run the gamut from odious to ludicrous), advising on survey strategies and implementation, providing technical preservation services in regard to redevelopment and rehabilitation, and helping identify funding assistance and other financial schemes (GMR 6-SA 4) and (GMR 4-SA 7).

All of this is predicated on a number of necessary and sufficient conditions: an allocation from the Historic Preservation Fund, implementing regulations, and the ability of the SHPO to maintain the present staff (GMR 1-SA 1), (GMR 2-SA 1), (GMR 3-SA 1), (GMR 4-SA 1), (GMR 5-SA 1), and (GMR 6-SA 1).

Map of Illinois showing county boundaries and names. Symbols are placed within various counties: triangles for S&P projects, circles for A&D projects, and squares for 2 S&P projects. The symbols are distributed across the state, with a higher concentration in the central and southern regions.









## PROGRAM OVERVIEW FY82

Major Accomplishments in FY81

Significant advancements were made in the Indiana program in the last fiscal year. The state was able to complete a pilot RP3 project in the coal mining counties. This initial project will serve as a tool in evaluating future RP3 activities and as a guide for future survey and protection activities in Southwestern Indiana. One very positive result of the RP3 project has been to involve additional members of the professional communities in the state's preservation program.

While the lack of regulations for listing privately-owned properties on the National Register has hurt the program, the moratorium on private and district nominations has made it possible for Indiana to eliminate the backlog of publicly-owned properties that had existed at the beginning of the year. Unfortunately, the backlog of private structures has greatly increased in the last year. Although the state was unable to conduct a National Register district workshop as had been planned, the Department of Natural Resources was able to prepare and print an information sheet of additional instructions on completing National Register applications for historic districts.

In the area of protection, the state has endeavored to work more closely with both the state and federal highway administrations on early coordination projects. In addition, there has been continued close contact with the cities of Evansville and South Bend. Discussions have been held with the cities of Fort Wayne and Indianapolis on methods to improve review of HUD funded UDAG and CD programs. In a major effort to be more responsive to the needs of federal agencies needing SHPO review of projects, the state totally revised and revamped standard comments on review letters and forms to provide greater information to project applicants.

The staff revised the state's grants manual prior to the annual meeting of subgrantees; however, the results from this effort have not been realized since new acquisition and development grants were frozen early in the year. The freeze on grant projects has allowed the staff architect more time in which to provide better technical assistance to would-be subgrantees, governmental agencies, and private citizens seeking advice on treatment of older structures.

To a large extent, the major achievements of the state office have been reached as a result of stability in the state staff. The past fiscal year is the first in which the state operated without vacancies in one or more of the professional or clerical positions. This stability has produced greater office proficiency, knowledge and sophistication.

The greatest change in the Indiana program in FY81 was something which was initiated by the State Legislature rather than by DNR. The 1981 General Assembly reorganized the DNR so that the Historic Preservation responsibilities of the Department were separated from the State Museum and Memorials system

and made a separate division. The new Division of Historic Preservation and Archaeology came into being as of July 1, 1981. The reorganization raised the program administratively to a higher level, making it more directly responsible to the SHPO, who is the Director of the DNR. In addition to increasing the visibility of the program, the action has made possible more control of the budget so that the program can be better administered. The change made possible a number of programs which were not feasible for one reason or another before July 1. One result has been the increase of public input from preservationists, interested citizens, and professionals. A meeting with representatives of the archaeological community produced significant results and opened up the possibility of greater communication between the state office and archaeologists in the state. The state took advantage of two other statewide meetings of preservation professionals and local representatives to encourage public assistance with setting priorities for the state program. There have already been two tangible results from these activities. The first was the establishment of a preservation internship position in cooperation with Historic Landmarks Foundation of Indiana, which will employ upper level college or graduate students in appropriate fields for four, twelve-week internships from September, 1981, to August, 1982. It is hoped and expected that the internship program will continue, provided that FY82 federal funds are awarded to the state. The program assists the state by providing additional professional help while, at the same time, students receive practical experience in the field of preservation. The other major result of the statewide meetings has been the tentative formation of a statewide lobby group to support the state preservation program. Although the state did not participate in or sponsor formation of the lobby organization, it is anticipated that the new organization will greatly assist the state's efforts and program in the future. Although the future remains uncertain and the cutback in the federal commitment to preservation is discouraging, the status of the Indiana State program has never been better.

### Problems and Needs in FY82

There are a number of problems and needs which must be addressed as part of major program elements such as survey, registration and protection; in addition, there are a number which either do not fit into those categories or cut across those elements.

In the area of survey it is important to maintain and initiate new efforts despite federal cutbacks so that the survey principle can be maintained. Of Indiana's 92 counties, ten have had comprehensive architectural/historical inventories, and survey projects are now under way in an additional 20 counties. Projects already initiated will account for approximately one-third of the state's counties. Continuing or expediting the architectural/historical surveys is dependent upon two factors. One is funding and the other is trained professionals. Since the state staff will be frozen at its existing level for the next two years, there is a need to see that sufficient funds are supplied to a sponsoring survey group. The project must be continued as expeditiously as possible, given the available funds and personnel. There are two needs in regard to archaeological sites. On the one hand, there is a continuing need to assist the major record holding institutions with an



organization of their existing records so that a uniform system can, eventually, be applied throughout the state in the area of recording and providing information on archaeological sites. Through past efforts of the state and the record holding institutions, approximately one-third to one-half of the existing records have been reviewed and organized. The other major need in dealing with archaeological sites is to add to the inventories of recorded sites. The state has sponsored three basic types of reconnaissance since 1976. Surveys have been done along selected river basins, in state parks, and in one county. There is a particular need to reassess the reconnaissance portion of the archaeological program to determine the best approach to be applied to identifying resources throughout the state in the future. The final need relating to survey is that of assessing the implications of the FY81 RP3 project in Southwestern Indiana. Further work is needed to determine how RP3 is to be implemented in the evaluation and protection of phases of dealing with resources in the 17 Southwestern counties of Indiana. In addition, an evaluation needs to be made regarding the feasibility of applying RP3 studies to the remainder of the state.

The problems of registration are of two sorts. On the one hand, there exists a tremendous backlog of privately-owned properties and proposed districts which will need action, once new federal regulations for the program are published. The state office lacks staff to do the additional editing so that nominations can be processed and sent to the National Register for final evaluation. The second problem is a lack of information and expertise in writing acceptable nominations. There is a particular problem in the area of preparing district nominations since existing instructions do not provide adequate guidance. It is hoped, also, that additional information or clarification for archaeological nominations would increase the number of nominations submitted to the state. There is a continuing need for encouraging and allowing for owner input in nominations, particularly for proposed historic districts. Problems which arise many times stem from the fact that owners do not understand the National Register program.

To encourage protection of cultural resources there is a continuing need for education of government agencies, project applicants, and environmental consultants on the value of environmental reviews and the particular problems associated with archaeological resources. Better understanding should encourage compliance. Expeditious review by the SHPO office will also encourage compliance. There is a need to reduce the review time to encourage early consideration of cultural resources. One type of archaeological resource that is threatened by widespread looting are rock shelter sites in Southern Indiana.

With the decrease in federal funds for acquisition and development activities, it is more necessary than ever to use limited federal funds for key projects which will save important structures or encourage other preservation projects. While the state cannot always provide federal funds, it can assist with technical advice.

A number of problems transcend the categories of survey, registration and protection. One problem regards the relationship of minorities to the preservation movement in Indiana. The primary need in this area is to

determine, first, what minority attitudes exist toward preservation and then to determine how their participation in the program can be increased. There is a need to address the problem of handicapped access to historic structures. Although public input in the state program has increased dramatically in recent months, there is a need for public participation in setting priorities to carry out the intent of the 1980 Amendment to encourage the development of local preservation programs. City preservation offices must be fostered to encourage them to assist with survey, registration, and protection activities.

### Meeting the Needs

The need to continue the architectural/historical survey will be met by a new grant to Historic Landmarks Foundation of Indiana to conduct surveys in four counties. At least one of the selected counties will be identified in the RP3 study area as having the greatest need for a completed survey. The archaeological surveys will be continued through surveys of the Huntington Reservoir and Northeastern Indiana. Additional input in the RP3 study area will be achieved through a survey of the Wabash River in Southwestern Indiana, and a Wabash Lowlands survey of areas likely to be subjected to strip mining activities. There will also be a survey of rock shelter sites in South Central Indiana. Grants will be awarded to three of the major record holding institutions in the state to further the work with computerization and organization of existing site records. DNR will undertake a major reassessment of the archaeological reconnaissance survey strategy as it is being applied to the state. This reassessment will be carried out with input from professional archaeologists in the state so that a revised plan can be adopted for Fiscal 1983, and beyond. Finally, work will continue in completing the final study periods identified for Southwestern Indiana under the FY81 RP3 project. This will be accomplished by means of hiring temporary professional assistance to work in the state office, as well as securing professional input from the RP3 Advisory Committee.

The primary need in the area of registration is to reduce the backlog of nominations for privately-owned properties. The major means used to reduce the backlog will be the preservation internship program begun by the state and HLF in FY81. Until the backlog is eliminated, the interns will be assigned to work full time on editing National Register applications. To encourage submission of archaeological nominations to the National Register, a grant will be awarded to Indiana University to complete approximately 20 new nominations for archaeological sites. This experience should increase the numbers in the archaeological community in Indiana who can prepare National Register applications. The need to provide better instruction for people doing National Register district applications will be met by conducting a statewide workshop after the new federal regulations are published and put into effect. The workshop will be for local preservationists and would instruct them in the particular requirements on district applications. In addition, as district applications come up for action by the state, the state will conduct information meetings within each proposed district to instruct residents as to the meaning of listing and to invite local comment before final action by the State Review Board.

In the area of protection, the need for improvement in reviews will be met by reducing the comment time by the DNR to less than 30 days. In an attempt to sensitize government agencies and consultants to the special needs of archaeological sites, DNR will co-sponsor a workshop concentrating on the specific needs of archaeological resources. To encourage the preservation of key structures in local communities, projects for the preparation of plans and specifications will be funded for the Old Vanderburgh County Courthouse and the LaFolier House. Planning and construction projects will be funded for the Bucklen Theatre in Elkhart, St. Stephen's Church in Indianapolis, the Old Montgomery County Jail in Crawfordsville, the Gramelspacher House in Jasper, the Kintner-Withers House in Harrison County, the Muncie Public Library, and the Old Hamilton County Jail in Noblesville. To assist with local interpretations of the Secretary's Standards in housing rehabilitation projects, the state will prepare and provide information packages for use by local rehabilitation people. The packets will assist with applying the Secretary of Interior's Standards to structures normally encountered in Indiana.

To address the question of minority participation in preservation and to encourage public participation in the state's program, DNR will undertake a pilot project to, first of all, identify what problems might exist in involving minorities in preservation activities, and determine how those problems might be overcome. Dealing with the question of handicapped access will be addressed, in part, by funding a planning project for the Old Vanderburgh County Courthouse, which will include plans for providing handicapped access to the structure. Three grants will encourage the development of local preservation offices. A grant to the City of Evansville will help fund a city effort to prepare National Register applications and to assist with Tax Act reviews. Two other grants, one to the Indianapolis preservation office and one to an Indianapolis neighborhood organization, will also fund preparation of National Register applications, Tax Act review, and design review for renovation activities. Continued public participation in the program will be secured, in part, through the informational meetings for proposed National Register districts, as well as through continuing DNR participation in statewide meetings for professionals and citizens interested in preservation. Input in these meetings will be used to set state priorities in planning activities. Public awareness of the state program will be improved through a continued use of press releases and preparation of a brochure about the Division of Historic Preservation and Archaeology.









## PROGRAM OVERVIEW

Iowa's Historic Preservation program during FY81 satisfied particular state needs while following federal preservation goals and priorities. Our special accomplishments corroborate these interlocking sets of goals which served the same end: to foster an effective state and federal preservation partnership while stimulating greater participation and input from local governments, key planning agencies, neighborhoods and other groups. We met local needs by tying our survey and registration programs with activities designed to encourage feasible protection strategies. Concerns and helpful suggestions expressed by various preservation-minded constituents and professional groups were incorporated into Iowa's survey, registration and protection programs. We plan to continue integrating local needs and input into our developing Resource Protection Planning process. Pursuant to P.L. 96-515, 10% of our planning estimate is being reserved for local government programs.

Many of the problems to be discussed center on local circumstances which affect the Division's performance. The Iowa legislature is expected to vote on a State Historical Department reorganization bill this winter and the structure and scope of the Division in a newly organized Historical Department is uncertain. Meanwhile the Division is in the process of moving its operations to Des Moines, a task that is to be completed by July 1982. During this time of pending reorganization and Departmental consolidation, considerable staff time has been diverted from full time preservation activities, especially that of the SHPO, who is now the Director of the Division of Historical Museum and Archives as well as the Director of the Division of Historic Preservation. Compounding these difficulties is a depleted staff caused by uncertain federal funding and a reduced state appropriation applicable to all agencies.

As with other states, the uncertainty of securing federal funding for future fiscal years has significantly impeded Iowa's progress toward finishing many activities. Nevertheless, our Special Accomplishments are both numerous and significant.

## SPECIAL ACCOMPLISHMENTS

### A. Accomplishments in Some or All Program Elements

1. Division seed money for site surveys has fostered a city-wide preservation program in Davenport (Iowa's third largest city). The resulting program embodies national and state objectives aimed at encouraging imaginative local implementation of surveys with registration and protection. An historical and architectural survey has been completed and the city intends to publish the results this fall. A Division-funded city preservation planner on Davenport's staff has enabled the city to institute a number of effective registration and protection strategies.

The city has actively encouraged local residents to take advantage of the Tax Reform Act. The efforts have, to date, attracted roughly a half dozen applicants, and more are expected. In another outstanding example of a local protective measure devised by a city with Division support and coordination, Davenport initiated its own Acquisition and Development program, extending fifteen \$1,000.00 grants for exterior building restorations, all in compliance with the Secretary's Guidelines. National Register owners received the grants; nineteen more expect local grants-in-aid this years.

In addition to stimulating activity as well as interest in historic preservation, Davenport found enthusiastic backing for a Neighborhood Housing Services program encompassing an area which includes the Village of East Davenport Historic District. In addition, the preservation planner (who is Iowa's National Trust liaison) is participating in environmental reviews, the writing (in progress) of a preservation ordinance, the potential designation of six new historic districts (which should occur in FY82) and frequent public information presentations.

2. The city of Des Moines (Iowa's largest city) passed an ordinance establishing a Historic Districts Commission empowered to designate Districts, institute and enforce easements and encourage proper preservation techniques. The ordinance, which was created with Division consultation and support, is a prime example of an accomplishment that encompasses all the FY81 HPF priorities. An HPF preliminary survey in Des Moines resulted in the registration of key buildings and districts, followed by a locally inspired protection program with Division assistance. Local public concerns were aired and implemented through a clear, open, and structured public input mechanism as established by a critical planning agency.
3. The largest area-wide historic sites survey in Iowa, embracing the three major disciplines in historic preservation was completed during FY81 by the Central Iowa Regional Association of Local Governments (CIRALG). In addition to augmenting the State's survey data file, this three-year survey of eight counties was widely publicized in the region and served as a catalyst for further grassroots preservation activities. The Division funded and collaborated with an outreach publication, "Hometown Architecture Changes in Central Iowa Towns and Farms". This resulted directly from the architectural and historical surveys. A separate archaeological report is anticipated by March, 1981. The planning for the resulting outreach program involved one of the state's most critical (and largest) planning agencies and other local community member planning agencies. Concrete results in the area of protection have been realized. For example, the formation of an ad hoc neighborhood preservation group in the city of Ames caused the city to defer judgement on rezoning a historic neighborhood into a commercial zoning region. This neighborhood was highlighted in the survey.

The archaeology portion of the CIRALG survey resulted in the creation of a testable predictive model for locating archaeological sites in the region. While it is a first generation model, it represents the first rigorously developed model for more accurate prediction of archaeological sites outside major stream valleys in the planning area.

4. Another example of positive communication with local planners was a series of discussions with State Mining Authorities at the Iowa Department of Soil Conservation. Extensive talks concerning future compliance cases have led to a more positive interagency relationship and an established procedure to obtain surveys of mining permit areas to protect significant cultural resources in those areas.
5. During FY81 the Division has labored to enact administrative system improvements in many areas of office management. One special accomplishment was the clearing of prior year difficulties identified in HPF audits conducted in June and December, 1980. The audits covered all operations accounts since the Division's inception. All questions brought up by the auditors have been answered, and the Division has improved its fiscal accounting procedures in order to prevent diffi



culties of the kind which arose during the first years of Iowa's preservation program.

Another area of administrative improvement has both heightened office clerical capacity and increased its efficiency. The installation of word processor equipment enhances the Division's abilities in a variety of areas. Bulk mailing has become a simple routine, rather than a dreaded chore utilizing additional personnel. Hence the Division can disseminate important announcements at less administrative cost. Another benefit is the Division's report production capability. Editing and the assembly of draft and final copies (including this work plan) may be accomplished with less clerical time. The word processor also affords considerable data storage capabilities, which is already proving beneficial in our survey inventory program.

#### Accomplishments in the Survey Program

1. Continued contact with officials of the City of Iowa City has increased community interest in preservation. The city is currently finishing a survey conducted during the summer of 1981 that covered select neighborhoods. The purpose was to obtain National Register status and to establish local historic district status (see Needs section). This was a project with Division of Historic Preservation co-sponsorship and financial assistance.
2. The largest single regional survey effort in Iowa, covering eight counties, completed year three of a five-year study. The Area XV Regional Planning Commission has maintained its pre-agreed schedule of an archaeological, historical and architectural sites survey in the region. The RPC is simultaneously conducting a Public Education and outreach program designed for local planning agency members, community schools and local and county historical societies. Information already gathered and collated has been used for Iowa's developing RPPP.

#### Accomplishments in the Protection Program

1. This fiscal year the city of Council Bluffs (the second largest community in western Iowa) passed a Heritage Preservation ordinance with extensive staff assistance from the Division of Historic Preservation. The ordinance establishes a Heritage Preservation Commission with responsibilities to survey, designate, protect, enhance, perpetuate and preserve its historic and cultural properties. The Commission will write a community preservation plan and establish Historic Districts as well as acquire historic sites. The city will be given a Division-assisted matching grant for an architectural and historic survey if the Division receives an FY82 HPF grant.
2. The Division maintained contact with three other cities whose officials and civic groups have expressed interest in preserving historical structures in their downtowns. The Division has urged the use of various protection measures in the cities of Fort Madison, Bentonsport, and Marion.
3. The Resource Protection Planning Process has been initiated although work is proceeding at a pace slower than anticipated. The first phase, which consists of a draft report delineating work units, study units and an implementation strategy, will be completed in the fall of 1981. During FY82 the RPPP will be further refined as it becomes the basis for preservation planning and compliance decisions.

4. The Division funded an extensive evaluation of three of Iowa's four NHL archaeological sites. The project substantiates the past effects of land use, provides an overview of major artifact collections from the sites, evaluates the accuracy and range of the present NHL boundaries and makes recommendations regarding the future care of these sites.
5. During the spring and summer of 1981, the SHPO worked with the National Trust immediately after the Trust acquired a new property, Brucemore, a Queen Anne mansion in Cedar Rapids. The Trust, with Division assistance, established local administrative management of its newest property, and will operate the property as a cultural center for Cedar Rapids and the vicinity.
6. The Division took steps to encourage saving the historic Ogden Hotel in Council Bluffs. City planners and the owner could not find a local buyer, so the decision was made to demolish the structure. The Division contacted an out-of-state development firm interested in renovating historical buildings. Plans to purchase the building are currently being negotiated.
7. A Des Moines stenciling, graining, and marblizing expert headed a workshop held by the Division in Iowa City, which attracted attendance by private preservationists statewide.
8. Members of critical planning agencies and private preservationists in Iowa attended a Division-sponsored two-day Preservation workshop held at Iowa State University which featured well-known preservation experts from all over the country.
9. The following highlight Iowa's public information protection program which involves all aspects of preservation:
  - a. The city of Dubuque has just completed a Division assisted planning study of its historic Lower Main Street area with the intent of revitalizing this neighborhood through increasing the owners' sensitivity to preservation issues and techniques. The report will be distributed statewide as a model Main Street planning project.
  - b. A preliminary draft research report on the McMinimee-Ahart-Denison (MAD) archaeological site in the vicinity of Denison, Iowa, has been printed. The report documents the excavations and analysis of the cultural record found at the site. A major result of the study is the extensive revision of the chronology and settlement-subsistence system attributed to the Plains Woodland tradition in Western Iowa. The site has proven pivotal in advancing the understanding of this important cultural tradition.
  - c. Iowa has published an updated publication of all current National Register properties. The publication includes a brief description of the significance of all single listings and a statement on all districts. Copies will be sold during FY82.
10. The Division funded an adaptive re-use exhibit and program in Iowa City designed to highlight both national and outstanding statewide examples of creative adaptive re-use projects. The exhibit and its accompanying brochure focuses on several building types which have been converted into imaginative new uses. The program, "Buildings Reborn: New Uses, Old Places", began as a two-day symposium in a reused historic site converted from a church to a community meeting place. The Iowa exhibit, appeared alongside "Buildings Reborn", a Smithsonian Institu-



tion traveling exhibit. The traveling Iowa exhibit is continuing to be scheduled and sent by the Division to various cities throughout the state. During Historic Preservation Week, for instance, the Division displayed the exhibit in the State Capital building at Des Moines.

11. The Division sponsored with the Amana Heritage Foundation (an NHL district) a series of meetings/workshops designed to interest the local populace on proper preservation techniques; this group also continues to publish a preservation "dos and don'ts" column in its local newspaper.
12. The Division has initiated a study whose imminent publication will be of benefit to rural preservationists nationwide. The publication is an annotated bibliography of agricultural buildings, 1865-1977. This will become a valuable survey research tool for classifying types of agricultural buildings and documenting agricultural practices.
13. The Division co-sponsored a special public information program called "Iowa Architecture" which played to audiences all over the state. The slide shows specifically emphasized the need for survey, registration and protection strategies through an effective community awareness format.
14. The Division held a preservation film festival open for public viewing during Preservation Week. A representative of the National Park Service made a presentation which was attended by preservationists from all over the state. The event took place in a well-known National Register property in Iowa City.
15. "Images of the Rural Environment", is a Division of Historic Preservation co-sponsored (along with corporate support) public information video-slide presentation. Targeted for civic bodies and planning agencies statewide, the program explores preservation in the context of land use decision making. It is scheduled for numerous showings during FY82. The goal of this project is to encourage more intensive survey work of Iowa's rural land so that a thoughtful and practical rural preservation strategy can be devised.
16. The Division was an advisor and co-sponsor with the Iowa Victorian Society of a well-received slide presentation, "Iowa's Victorian Architecture from the Civil War to the Turn of the Century". Encompassing examples from all over the state, the presentation has proven very popular. In fact, it was shown at the Victorian Society's Annual Meeting in Newport, Rhode Island.

## PROBLEMS AND NEEDS

### Introduction

Division objectives suffered primarily from unforeseen local circumstances. The 1981 state legislative session saw a bill introduced to reorganize the Historical Department which would have shuffled its administrative functions and perhaps departmental activities. The SHPO, Adrian Anderson, devoted considerable time in meetings and consultations concerning this issue. Moreover, within the presently constituted department, the Historical Board appointed Mr. Anderson to be Director of the Division of the Museum and Archives in Des Moines, in addition to exercising his responsibilities as SHPO/Director of the Division of Historic Preservation. Accompanying the appointment was an order by the Historical board (at the Governor's Economy Committee's recommendation) to move operations of the Division of Historic Preservation to Des Moines by July 1, 1982, the beginning of

the state fiscal year. The preservation office will, in all likelihood, be located (although this fact is not entirely certain) at the museum. Our staff has been working with the museum staff to coordinate the countless details of the move and to arrange adequate working space in an already overcrowded museum building. This unexpected, but necessary, disruption caused a considerable expenditure of staff time which normally would have been devoted to meeting preservation activity objectives. The forthcoming move itself will probably in effect close the office for a few weeks and will, in all likelihood, curtail regular office functions for approximately four to six weeks as staff members relocate to a new city. These highlight the main problems which have hampered preservation activities.

In addition the Division needs to adjust to a smaller state appropriation. This is part of an equitable fund reduction applied to all state agencies. Concurrent with this development, the Division has been forced to postpone the hiring of six staff, including a National Register Coordinator and an architect.

Other long-range problems continue to hamper the creation of a useful--that is, well-defined--framework for state staff and local level decisions regarding land use, zoning and other measures with a potential impact on historical and cultural sites. Although we have been fortunate to witness positive, thoughtful preservation-oriented actions by critical planning agencies (e.g. Des Moines, Council Bluffs, Davenport, etc. as previously discussed), the Division hopes to further refine a statewide decision-making framework translating survey data into useful management information. The action taken to date has been to discuss potential decision-making problems with critical planning representatives before they become brushfire problems. Formerly Division staff shortages gave us the capacity to only react to difficulties arising when local development programs involved cultural resources.

The RPPP historic resources management plan and the statewide overview survey reports, which will serve to establish evaluative contexts, are not yet, but should be completed by the first quarter of FY82. Likewise the new state plan (for HPF priority 1) and Technical Assistance Manual have fallen behind schedule. Upon completion of the plan we will be able to anticipate difficulties arising from local development programs which affect cultural properties. The Technical Assistance Manual, which addressed FY81 HPF Priority 3, should be completed by the end of the FY81 funding cycle. Assistance, advice and meeting with critical planning representatives has comprised the bulk of activities engaged in for dealing with HPF Priority 3. Given the circumstance of limited and uncertain future funding and a depleted staff, the Division has made excellent progress with critical planning agencies, local constituents and ad hoc groups representing the most populous areas of the state.

## ASSESSMENT OF PROBLEMS AND NEEDS AND WAYS TO MEET THE NEEDS

### Survey

The lack of survey work in key urban areas constitutes the greatest problem for Iowa's program of surveys covering the built environment. Survey data extracted from these communities should assist local planners in preservation decision-making as well as provide a broader base for developing a statewide comprehensive planning document. Moreover, survey work in Iowa's key communities will include most of Iowa's minority (especially blacks) and ethnic populations and should encourage further participation by these groups.



These survey needs will be met by continuing the Area XV Regional Planning Commission year survey and by conducting a minimum level documentation historical survey of Des Moines, and minimum level documentation architectural surveys in Council Bluffs and possibly Sioux City. The Des Moines study will complete a former preliminary survey; the Sioux City survey will provide local preservation planning information to this city for the first time. Other projected survey plans include a staff acquisition and evaluation of independent survey data (inventory information) on Cedar Rapids (Iowa's second largest city); an historic sites survey of Ottumwa, an important middle-sized city in southeast Iowa; and rendering assistance to the architectural survey personnel of the eight county Area XV Regional Planning Commission.

The greatest problem for Iowa's program for survey and significant archaeological resources (i.e. the remnants of the built environment) is the ability to make accurate prediction of the presence of archaeological resources in several areas of the State where activities by critical planning agencies may impact such sites frequently.

Great strides have been made in just four years toward developing predictive capability in almost 20% of the State. This is largely because of surveys funded with HPF monies, but also because of intensive effort to better understand how the landscape has changed over the past 10,000 years, the latter being concentrated in western Iowa. The relationship of cultures to the changing landscape, particularly in alluvial areas, has become much better understood than ever before in Iowa archaeology. This emphasis has markedly influenced the design of archaeological surveys, has resulted in the identification of more significant sites relative to past approaches, and has led directly to establishing an evaluative context for archaeological resources. This approach integrates very well with the resource protection planning process, particularly with identifying the limits of accuracy of existing data, and what kinds of data are needed to refine study sites identified through such a process. A combination of survey, registration, and protection projects are intended to reflect the needs identified after the first few months of endeavoring to make the transition from the more subjective methods of identifying important projects in the past to the more rigorous and objective planning process the State is attempting to achieve.

The first project is a continuation of the regional survey of the planning area of Area XV Regional Planning Commission. This will be done to build on data already acquired in the survey project, which has been collected using the more geographically oriented approach indicated above. This multi-year project has reached the point where it is concentrating on little-known areas of south-central Iowa, where known sites are clustered in areas researched many years ago. The strategy is to use an extensive sampling approach to test the qualitative observations made about the relationship of archaeological sites to various culture periods in the eastern counties of the region, with the patterns found in the western counties of the region.

The second project is to be in cooperation with the Iowa Geological Survey and is to begin developing a predictive model of landscape evolution in southeast Iowa. The model developed largely in western and southwest Iowa has been very successful. This project, which will include Area XV Regional Planning Commission planning area, will also include the southeast Iowa Counties of Lee, Des Moines and Henry. The results of this work can be directly applied to assisting numerous critical planning agencies, and to understanding questions about culture history and process in the southeast quadrant of the State.

The third survey project is intended to gather data about Woodland and Archaic period sites in areas of the Mississippi Valley where activities by critical planning agencies are frequent. The critical planning agency most involved in the area is the US Army Corps



of Engineers, specifically their permitting program which frequently involves permits to private land owners. Surveys of at least 20% of the near-shore zone of the Mississippi River in Allamakee and Clayton Counties, Clinton and Scott Counties, and Des Moines County, will provide data directly usable for evaluating the potential impacts of federal permits and other activities in these areas where there is a high density of environment review concerns, excellent overlap with archaeological study units in which the Woodland period is very poorly known (the backwaters and island in the Mississippi Valley), and conforms well with one of the presently proposed management units (the Mississippi alluvial valley).

### Registration

Problems plaguing the registration program in Iowa point to the unwanted reduction in staff. Specifically, a state hiring freeze prevents the hiring of a National Register Coordinator. Directly related to this problem is the need to register recently received and collated data from Iowa's largest completed survey which covers eight counties. This survey was conducted by the Central Iowa Regional Association of Local Governments (CIRALG). Supporting activities designed to address these needs (depending upon the level of federal funding) include the hiring of qualified interns and consultants (also done in FY81) to prepare National Register nominations.

Projected National Register nominations include the following: at least one multiple resource nomination should result from the CIRALG survey, which will be possible if the state receives rules and regulations from the National Park Service for owner notifications and concurrence. The Division also intends to produce a thematic nomination of Iowa round barns, to produce a District nomination of Iowa City, and a multiple resource nomination of Guttenberg. Lastly, the Division intends to nominate the Heritage Hill neighborhood in Burlington for National Register District status. This is a follow-up to a former Division of Historic Preservation-sponsored survey.

The registration of archaeological sites in the National Register of Historic Places has been a slow process in Iowa due to overburdened and limited archaeological staff. Previous surveys have identified several archaeological sites for which information is adequate to prepare nominations. Nomination forms will be completed for the following publicly owned archaeological sites, districts, or areas:

- Maquoketa Caves State Park - multiple resource district including archaeological sites; Jackson County
- Brushy Creek State Recreation Area - six archaeological sites, including two conical mounds; Webster County
- Pikes Peak State Park - district, or separate sites, including conical and effigy mounds.

Nominations will be prepared for the following archaeological sites on private lands if National Park Service rules are adopted and owner concurrence is obtained:

- McMinimee-Ahart-Denison site; Denison, Crawford County
- Rockshelters - eight sites, multiple owners; Jackson County
- Merrimac Farms Site - a large multicomponent village in Jefferson County
- West Des Moines Burial site - remnants of previously disturbed burial site in Polk County
- Smokey Hollow District - six archaeological sites in Woodbury County
- Arthur Site - (1) remnants of a multicomponent village in Dickinson County.

## Protection

Devising a cohesive statewide protection strategy is perhaps the most challenging of program elements, particularly because the diversity of local situations demands different protection strategies. With the loss of the Acquisition and Development program, the Division will attempt to foster public information programs targeted for specific problem areas. For example, the Division will co-sponsor Iowa State University's annual two-day historic preservation workshop; update a publication of Iowa National Register listings; publicize Iowa's National Register courthouses nomination; and assemble a preservation Technical Assistance manual which will serve as a model for local protection methods. The Division plans to disseminate information on the new Tax Act to leading planning agencies, government agencies, developers, bankers, real estate firms, CPA's and other parties most likely to utilize the new tax incentive. The Division will continue to maintain its Review and Compliance program and is now attempting to attain full state funding so as not to disrupt the program if faced with severely limited federal funding.

The Division has also maintained close contact with three other cities whose officials and important civic groups have expressed interest in incorporating preservation in their downtown development plans. Division contact with these groups has consisted primarily of staff meeting with civic leaders, followed by appearances and speeches at community gatherings. The city of Fort Madison has expressed interest in conducting a city survey. Its civic leaders want to develop an historic district for protection purposes. Likewise, the neighboring community of Bentonsport is seeking to develop a policy aimed at protecting its considerable historic resources. The Division is attempting to encourage the community to mount and sustain a preservation public information program. Another city with similar aims is Marion, whose local historical society is encouraging its civic leaders to develop an important historic district.

The in-place preservation of significant archaeological sites has been a primary concern of the Division for several years. A recent survey of three of the four archaeological National Historic Landmark sites in Iowa has demonstrated that the long-term integrity of the Blood Run National Historic Landmark site is in serious doubt. The Division of Historic Preservation will formally request the assistance of the private landowners, the National Park Service, the Soil Conservation Service, local soil conservation officials, Native Americans, the Iowa State Archaeologist, and other concerned state agencies and perhaps private foundations to cooperate in preparing a plan for protecting this very important site.

A second protection project is the completion of the report of excavations conducted in the Pony Creek area of southwestern Iowa several years ago.

A final project proposed to be done is the further development of the Resources Protection Planning Process. The use of RP3 in Iowa has received excellent support from the archaeological community and other state agencies. During the planning year effort will be concentrated on refining the definition of several study units identified during the HCRS-assisted RP3 development project. This is proposed to be followed by selecting two operational plans and one management plan. However, in order to arrive at one management plan, thus completing coverage of more of the state beyond the level achieved by the HCRS-assisted effort, careful selection of the study units and creation of the operating plan will have to be made so as to provide sufficient overlap to allow adequate definition of the management unit.









Accomplishments

A major accomplishment of the state historic preservation program during federal fiscal year 1981 was the enactment of two amendments to the state's 1977 historic preservation law. The first enlarged the Kansas Historic Sites Board of Review to 11 members, which included the governor and the state historic preservation officer or their designees and nine members appointed by the governor: five professionals (architect, architectural historian, historian, prehistoric archeologist, historic archeologist) and four members from the general public. The new law also provided for staggered terms for appointive members so that the board would always have a majority of experienced members.

The second amendment defined terms which had been used in the protective clause of the 1977 act but not defined. It corrected some ambiguities in terminology and broadened the coverage of the protective clause. The responsibility of the state historic preservation officer was extended to include oversight not only of the direct actions of state and local government units that affect historic properties but also of regulatory actions of these units, such as zoning, licensing, permitting, etc., that may allow or encourage nongovernmental projects having adverse effects on identified historic properties. The law applies only to properties listed on the National Register of Historic Places or the Register of Historic Kansas Places. Information on the new law was sent by certified mail to the governing bodies of all cities and counties which had National Register and state register properties within their jurisdictions. Additional mailings were made to all owners of protected properties, local historical and preservation organizations, and to other interested individuals.

Another noteworthy accomplishment was the compilation by the staff archeologist of a bibliography of archeological reports received by the state historic preservation officer and its subsequent publication. That bibliography, which was arranged by author and geographical area, provides a ready reference for previous archeological

survey and assessment work. It has been distributed to cultural resource management staff of federal agencies operating in the state and region and also to archeologists working in the state. Subsequent updated bibliographies are planned to coincide with the end of each federal fiscal year.

#### Assessments of Problems and Needs

Information is still lacking on the range of historic resources present in many communities and counties of the state. Surveys are the key to an understanding of the state's total historic, architectural, and cultural resources. Such an understanding would enable the state office, as well as local governments and organizations to set priorities for processing local landmark designations and nominations to the national and state registers and for concentrating protection efforts.

If surveys are indeed to serve as planning tools and not merely to be filed for future reference, analysis of the findings is imperative. Much of the survey work already included in the state inventory has not been professionally analyzed. The interpretation of surveys must be done in a manner that will make them comprehensible and useful to local government officials and concerned citizens. In the coming year local and regional organizations carrying out surveys with the federal preservation funds will be encouraged to analyze their findings with the assistance of the preservation office's architectural historian. It is recommended that analyses should include the different building types found within the survey area, the number of examples of each, deviations within a building type, and those structures which retain a high level of integrity. Regional and local planning commissions should be encouraged to incorporate survey data and findings into their other planning activities.

Little emphasis has been placed on survey of rural properties outside of several counties partially surveyed by state staff. Given the strong rural and farming tradition of the state, it is vital that this aspect of its heritage be given greater emphasis. Regional organizations carrying out surveys with federal preservation

funds in the next year will be assisted in incorporating a strong rural emphasis in their surveys.

The staff of the state preservation office is aware of the need for additional survey work but lack of manpower has prevented the staff from doing much about it. The state has rejected previous requests for additional staff as well as authority to contract survey work. Local groups performing volunteer surveys have been successful in some communities. Generally speaking, successful volunteer surveys require some level of assistance from the state staff--training and guidance to get started, encouragement, advice and sometimes badgering to get the work done, and help with evaluating findings against local, state, or national criteria. Because the existing state staff could not provide the necessary level of assistance this past year, three local surveys that were to be assisted with federal preservation funds had to be cancelled or terminated prior to completion. Difficulties also arose with other surveys because of the lack of supervision the staff could provide. The funding of any local surveys in the future must be accompanied by a staff commitment to provide the assistance necessary for the survey to be successful. That will require either additional manpower or subordination of other activities to survey oversight.

The coal reserves of four counties--Bourbon, Crawford, Labette and Linn--are currently being mined. These counties and others located in the coal fields of southeastern Kansas will be affected by surface mining during the foreseeable future. Strip mining in this region primarily affects archeological resources located on privately-owned land.

The archeological site inventory currently lists a total of 17 sites in Crawford, 53 sites in Labette, 94 sites in Linn, and 283 sites in Bourbon county. These totals reflect project specific surveys and reports from amateur archeologists rather than a complete and comprehensive survey. The Big Hill Archeological district which contains 21 sites and is located in western Labette county, is the only National



Register archeological property in the region. This district is within the proposed Big Hill lake, a U. S. Army Corps of Engineers project. No sites are listed on the state register.

Additional archeological surveys are needed to provide a comprehensive list of sites to be used for state and National Register nominations. These nominations will provide the means for identifying significant resources to the Kansas Mined-Land Board for its consideration in permitting future mines.

Processing of nominations of properties to the National Register of Historic Places has not been emphasized in the Kansas program. The nomination and review process is extremely time-consuming and the size of the staff made it necessary to subordinate nominations to more pressing projects. In FY 1981, however, efforts were made to eliminate the long delays in processing nominations. These were fairly successful, and the backlog of properties awaiting review by the review board has been reduced considerably. Additional staff will be required to continue processing nominations and to insure that other projects do not suffer. In the past year, for example, there was a greatly increased interest in nominations of large commercial structures from developers and investors. The workload of the staff was such that these nominations could not be processed as quickly as the developers desired, and the result was confusion and misunderstandings.

The staff ordinarily does not initiate nominations except for archeological sites and specialized nominations, such as district and thematic nominations. The staff recognizes the value of district, thematic, and multiple-resource nominations for providing protection, tax incentives, etc., but has too many other responsibilities to work on them in a consistent manner. These specialized nominations are also usually beyond the capacities of the local volunteer organizations and interested individuals who submit the bulk of the nomination requests. Also, their interests are usually focused on specific individual buildings rather than on an entire class or neighborhood.

Two other matters should be attended to more carefully when nominating properties to the National Register. A property's merit is often contingent on its environs. For this reason, greater attention should be given to the determination of the property's boundaries. In addition, more precise physical descriptions of the properties are needed. Photographs do not provide detailed enough information and should not be used as a substitute for thorough, written descriptions.

Listing of a property or district on the National Register tends to excite more interest and draw more attention than local or state designation. Such a listing and the attendant publicity heightens a community's awareness of its historical and architectural resources. Unfortunately that awareness has not yet been kindled in very many Kansas communities. With the current tax incentives for rehabilitating historic commercial buildings, publicity for one project and one National Register listing can have positive spin-off in the community.

For the protection element, one problem that can be identified is the lack of a truly comprehensive state preservation plan. Obviously the need exists for such a document to provide guidance and help set priorities. Preparation of comprehensive state preservation plan in-house would require additional personnel and planning expertise.

So far the tax incentives of the Tax Reform Act of 1976 have not resulted in a great deal of rehabilitation of historic buildings in the state. Many inquiries have been received and information provided but so far few projects have come to fruition. Much of the interest has been late developing--the last two years--and undoubtedly the general economic conditions have had a delaying effect on some projects. Only two final certifications and three preliminary certifications for rehabilitation work were approved in FY 1981. Considerable public education needs to be done on the new incentives provided by the Economic Recovery Act of 1981 as soon as appropriate explanatory and analytical materials have been provided by the National Park Service, National Trust, and others.

Except for the Economic Recovery Act's incentives, devices are now lacking that provide tangible encouragement for property owners to rehabilitate historic properties. National Historic Preservation Fund grants have been eliminated, and no preservation loans are available. New federal tax incentives pertain only to very large commercial projects. Tools are needed to provide encouragement to the home owner, small businessman, small investors, etc. A possible solution would seem to be amending the Economic Recovery Act of 1981 to provide incentives and benefits for smaller projects and for homeowners. Another possibility is to explore state legislation providing for property tax freezes or rebates for rehabilitated historic properties.

Kansas law does not presently address the subject of donations of open space or facade easements. The possibility of utilizing such protective devices should be studied.

#### Activities to Meet Problems and Needs

In order that the Historic Preservation Department can more satisfactorily discharge its duties and responsibilities as the state historic preservation office and address the problems identified above in a meaningful way, additional professional and support personnel must be added to the staff, either as full-time employees or under contract. The agency is again requesting the governor and the legislature to authorize more personnel. Any new positions approved during the 1982 legislative session can be filled effective June 18, 1982.

The following are specific activities that will be undertaken to meet survey problems and needs identified above:

- (1) An archeological survey by the staff of potential coal mining areas in Crawford county;
- (2) An archeological survey by the staff of southeast Scott county, an area where no previous reconnaissance survey has been done;
- (3) Continue to provide advice and assistance to Salina survey and



preservation planning project assisted with FY 1981 funds;

- (4) Continue to provide advice and assistance to Mo-Kan Regional Planning Commission's survey in Atchison and Doniphan counties and to aid in evaluating survey findings (activity assisted with FY 1981 funds);
- (5) Initiate project with Flint Hills Regional Planning Commission for a three-county survey, provide necessary assistance and aid with the evaluation ( activity assisted with FY 1982 funds);
- (6) Initiate project with North Central Planning Commission for survey of nine county area, provide necessary assistance and help with evaluation of survey findings (aided with FY 1982 funds);
- (7) Initiate project with Geary County Historical Society for survey of original plat of Junction City, provide necessary assistance and help with the evaluation (aided with FY 1982 funds);
- (8) Initiate project with City of Haysville for survey project with FY 1982 funds;
- (9) Evaluate state wide survey of historic bridges when the materials are transferred from the Kansas Department of Transportation to the Historic Preservation Department;
- (10) Provide assistance to any other volunteer surveys that might become active during the year, including training, advice, and help with evaluating survey findings.

It is recognized that federal agencies will continue to fund surveys in areas they may affect and that data will continue to come to the Historic Preservation Department by that means. The Federal Highway Administration (FHWA) is assisting the Kansas Department of Transportation in funding a statewide inventory of historic bridges. As of September 30, 1981, approximately one-half the state had been surveyed and 1100 structures inventoried at a cost of \$33,000. Copies of the completed



survey forms had not yet been transferred to HPD. The survey will continue in FY 1982. FHWA also helps fund archeological surveys of corridors and specific project locations. The Soil Conservation Service, Environmental Protection Agency, and the Corps of Engineers are other major sources of funding for project specific surveys. Cities such as Wichita and Manhattan which are seeking UDAG funds have performed total or partial central business district surveys.

The following are specific activities that will be undertaken to meet registration problems and needs identified above:

- (1) Eliminate backlog of properties which have been approved by the review board but not yet submitted to the National Register office by assigning such work top priority for the staff architectural historian;
- (2) Perform more stringent technical reviews of nomination forms before they are sent to the National Register office to insure technical completeness and accuracy;
- (3) Review and comment on all proposed nominations within two weeks of initial submittal;
- (4) Prepare final version and submit two thematic nominations--petroglyph sites and county courthouses--to the National Register office;
- (5) Prepare final versions and submit approximately one district nomination and 25 individual nominations.

The following are specific activities that will be undertaken to meet protection problems and needs identified above:

- (1) Send staff to seminars dealing with the tax incentives of the Economic Recovery Act of 1981 which will be sponsored by the National Park Service;

- (2) Prepare news releases, newsletter articles, and direct mailings to property owners and interested individuals regarding the Economic Recovery Act of 1981;
- (3) Utilize local survey findings and evaluations of same in reviewing projects for impact on potential historic sites;
- (4) Continue process of computerizing inventory data;
- (5) Continue the project of marking a set of USGS maps with all known archeological sites and all areas covered by surveys;
- (6) Continue to advise city, county, state, and federal officials of properties added to the National Register and the state register;
- (7) Assist cities in becoming certified local governments as defined by P.L. 96-515.

Some of the activities identified above will be accomplished by the existing staff, while others can be only initiated or partially accomplished by existing staff. All others can not be initiated without additional manpower.

The Kansas State Historical Society recognizes that submission of the FY 1982 work program and application does not guarantee funding inasmuch as Congress and the President have not yet taken final action on the Interior Department appropriations bill. Therefore the agency is requesting 100% state funding for operation of the Historic Preservation Department for state FY 1983 (July 1, 1982, to June 30, 1983). If federal funds become available, the agency will revise its state budget request.









## PROGRAM OVERVIEW

Major Accomplishments in the FY81 Program

FY81 was a challenging year for the Michigan History Division (MHD). Michigan is one of the states hardest hit by the adverse economic conditions prevalent nationwide, and the MHD program has had to shoulder its share of the burden in adjusting to difficult times. Uncertainties of both federal and state funding have made planning difficult. Subgrantees are having difficulty finding matching funds. The MHD has suffered from a state-imposed hiring freeze and currently lacks a deputy director, an assistant archaeologist, and a secretary. It is unlikely that these positions can be filled in FY82. A severe reduction in travel allowance has been a blow to the MHD's community outreach-oriented program.

The MHD has adjusted successfully to these difficult conditions, in part because of its strong foundations. Although some aspects of the program have suffered, its core functions have been preserved. The MHD has managed this by curtailing growth and increasing efficiency in dealing with high priority program elements. Anticipating the problems ahead, the MHD developed a realistic work plan for FY81 with scaled down objectives. The success of this planning is evident, for the MHD completed all but one (99%) of its objectives in FY81.

The MHD instituted several new approaches to the program to deal with its economic problems. One was to consolidate survey, registration and protection activities to make the most efficient use of limited funds. For instance, in its Survey and Planning grant program, the MHD stressed survey and registration projects in areas where protection needs were greatest. This resulted in planning studies in Detroit and Grand Rapids, the two largest metropolitan areas in the state; inventory projects in ten other cities and in six counties under intense development pressure, and acquisition of a large body of Detroit area archaeological records from a local university. Survey and Planning projects also resulted in multiple resource nominations for three cities. Archaeological Survey and Planning projects were chosen for their contributions toward predictive modeling. Another example of combining survey, registration and protection activities was increasing site inventory by working with agencies with major protection needs. Examples include: a survey to identify historic bridges conducted in cooperation with the Michigan Department of Transportation and the Federal Highway Administration, a survey to inventory historic state-owned buildings conducted in cooperation with the Michigan Department of Management and Budget, the exchange of archaeological inventory data with the U.S. Forest Service, and numerous land use histories compiled by HUD UDAG and CDBG project applicants, mostly in Detroit. Another approach to increase cost efficiency was to increase inventory by utilizing various sources of data available at minimal cost. These included inventories of cultural resources conducted by applicants for federal assistance, applications for the State Register of Historic Sites, existing literature, university archaeological site files, and properties reported to the MHD by government agencies, cultural resource professionals, and the public. These strategies proved to be surprisingly productive, for we collected three times the data anticipated in the FY81 workplan.

The MHD has always stressed public service in its activities. To cope with the reduction of allowable travel which limited face-to-face contacts, the MHD shifted its efforts to more indirect forms of public assistance. Our statistics on public contacts reflect this shift dramatically, with phone calls up 40%, letters up 100%, and mailings of technical assistance information up 60% over what was anticipated for FY81. The MHD found that its magazine, Michigan History, was particularly useful in disseminating preservation information to a wide audience, and published fifty-six preservation-related items in it instead of the planned ten. Demand for nominations to both the State and National registers remained high. The staff concentrated its efforts on Tax Act-related nominations (2 districts, 7 individual properties) and on districts and properties in urban areas or in areas endangered by development. In spite of submitting almost twice the projected number of nominations (118, including one district with 119 properties), the staff could not keep up with public demand. The MHD expanded its annual grants seminar to include more detailed training in survey techniques and grants administration. The improvement in the quality of inventory data and financial documentation has been gratifying.

A few other developments during FY81 are worthy of note. The Historic Sites Unit began comprehensive planning for the data management needs of the architectural and historic inventory, and took the first steps toward meeting those needs. The MHD cooperated with the Michigan Department of Natural Resources in protecting underwater resources from looting. The largest archaeological project in the state's history was begun to excavate portions of five National Register-eligible sites on U. S. highway 31. The MHD successfully aided local efforts to preserve National Register properties in Traverse City (Northern Michigan Asylum) and Allegan (Second Street Bridge). The Northern Michigan Asylum project sensitized the Department of Management and Budget to the desirability of identifying and protecting surplus historic state-owned buildings. The Second Street Bridge project pioneered the use of FHWA Critical Bridge funds for rehabilitation rather than replacement. The MHD also aided in expediting the documentation of the Dodge Main Assembly Plant and its surroundings (the "Poletown" area of Detroit) prior to demolition to make way for a new General Motors Plant. Five Acquisition and Development grant projects using funds from previous years were begun, including the Dunbar Hospital, the first hospital in Detroit for blacks and still owned by a black medical association. A FY79 Acquisition and Development project was completed which utilized innovative techniques to restore interior murals of the Honolulu House in Marshall. Another completed project was the restoration of the Federal Building in Grand Rapids and its conversion to the Grand Rapids Art Museum, which figured prominently in the recent festivities opening the Gerald R. Ford Museum.

Public demand for the services of the MHD has increased in recent years, and the MHD was pleasantly surprised by the broad-based public support it received when the program was threatened by federal budget cuts. A grass roots organization, the Michigan Coalition for Historic Preservation, sprang up to lobby on behalf of the program. Other organizations, including the Historical Society of Michigan, the local chapters of the Society for Industrial Archaeology, the Society of Architectural Historians, and

the American Association of Planning Officials; the Michigan Archaeological Society, about twenty local historical societies, and numerous private individuals such as developers, hobbyists, homeowners, and teachers, passed resolutions or wrote letters of support. This response suggests that the MHD has been providing the public with services it needs and values.



Problems, Needs, and Solutions: Survey

The Michigan History Division (MHD) survey program has achieved a high level of success in spite of several limiting factors that adversely effect its ability to meet its survey objectives. A long standing condition that has, to a large extent, determined the character of the program is the MHDs lack of inhouse survey capacity. As a result, the MHD depends on Survey and Planning grant projects to meet its objective of inventorying the state's cultural resources. Although this approach has been used with success for many years, recently, due to the state's severely depressed economy and the uncertainty of continued federal assistance, the MHD has experienced difficulty in soliciting Survey and Planning grant applications for projects in areas of the state critically in need of inventorying as a result of intense pressure for development.

A related problem is the increasing inability of grant applicants to obtain the necessary matching funds. The result has been a decline in the number of Survey and Planning grant applications submitted to the MHD - at the same time that the number of volunteer surveys producing data has tapered off.

For the Archaeology Unit, these factors have inhibited the development of reliable predictive models, a major goal of the program. The situation is worsened by the vacancy of the third archaeologist position, as a result of a state hiring freeze and a reduced departmental budget. This has lead to the accumulation of a backlog of data management tasks. The net effect of the recent decline in survey and planning grant applications and the shortage of staff is that the development of new survey objectives has been curtailed and the successful formulation of final predictive models in FY83 has been jeopardized.

A potential solution to these problems is the institution of 70/30 funding for the Survey and Planning grant program, which should enhance its attractiveness to potential subgrantees for both historic architectural, and archaeological surveys. The MHD will continue to monitor ongoing surveys and to solicit aggressively grant applications, particularly in critical areas of the state subject to intense pressures for development (Objs. #7, 8, 9, 10, 11, 12). Further, the MHD will give priority to funding Survey and Planning grant applications that would enhance the ability of local governments to identify, evaluate, and protect their historic cultural resources (Objs. #1, 2, 27). In addition, the MHD will continue to solicit data through its historic bridge inventory project with the Michigan Department of Transportation and the state-owned buildings inventory project with the Department of Management and Budget and various state agencies (Objs. #42, 43).

The archaeological program will attempt to ameliorate its staffing shortage by exploring the feasibility of using archaeology student interns to perform data management tasks (Obj. #16). In addition, the Archaeology Unit will supplement its data base by collecting materials from federal agency surveys, university site files, and the findings of private studies (Obj. #17). Predictive modeling will be carried out with an emphasis on establishing the support, cooperation, and active participation of the professional and avocational archaeological community (Obj. #21).

The Historic Sites Unit will require continued federal funding to maintain its program to enhance the ability of local governments to identify, evaluate, and protect their historic cultural resources.

Guidance on the application of the 10% local pass-through provisions of the 1980 amendments to the National Historic Preservation Act is necessary to enable the MHD to expand this program objective. This is especially important in light of the fact that the 10% local participation provision represents a cut in MHD funding. The damage this reduction in funding represents to the MHDs plan for meeting its objectives can only be mitigated if local participation can be directed to the fulfillment of Historic Preservation Fund goals and priorities (Objs. #59, 61, 64).

The Historic Sites Unit has identified a developing data management problem. To date, inventory materials have been collected for over 185,000 sites representing an investment of over \$2 million. Partially because of a lack of emphasis on data management by the federal program in the past, the MHD, like many other states, has emphasized collecting survey data, preparing National Register nominations, assisting preservation planning efforts, conducting review and compliance procedures and operating a public outreach program.

As a result of the progressively smaller federal appropriations each year, the Historic Sites Unit did not have the extra resources available to adequately assess its data management needs and plan for the orderly duplication, integration and computerization of all incoming survey data while still fulfilling the program elements emphasized by the Department of the Interior. At the current rate, a minimum of 16,000 new sites will be added to the state inventory each year. In addition to a developing storage problem, the ability of the data integration staff to process the material has been severely taxed. Currently a backlog of approximately 170,000 sites requiring additional processing, duplication and computerization has developed making it difficult to efficiently utilize some of the survey material for designation, protection and compliance or technical assistance purposes.

The Historic Sites Unit has begun to explore means of resolving its data management problems by reorganizing the physical facilities of the unit in larger and more efficiently structured quarters and exploring means of copying the data on microfilm or microfiche for storage purposes and protection from loss due to fire or theft. During FY82 the MHD will continue with efforts to increase the staffing of the data management unit and formulate a plan for eventual computerization (Objs. #44, 45).

Problems, Needs, and Solutions: Registration

The MHD has hardly begun the task of registering Michigan's significant cultural resources. We believe that as yet only a very small percentage of Michigan's potentially National Register-eligible sites, either historic/architectural or archaeological, have been documented at more than the most minimal level. The reasons for this are the inadequate staffing in both the Historic Sites and Archaeology units, which renders the MHD incapable of producing any high volume of this work in-house; the inadequate funding for the survey and planning grant program, which we must rely on increasingly to fund the bulk of research and registration activities; and the matching grant nature of this funding that requires grant recipients not only to take on a large share of the total project cost but also to fund in advance the total cost of the project. There is no short-term solution to this problem, and the only long-term solution is greatly increased funding for registration activities over a number of years.

We believe that we are utilizing the staff time and the funding that is available more efficiently and effectively than ever in furtherance of the state's registration program goals. The MHDs strategy for the registration of historic and architectural resources involves the in-house review of inventory data for National Register eligibility by the regional preservation coordinators and the preparation of nominations in-house--by the coordinators and designation assistant--and through survey and planning grant contract work and volunteer efforts.

To assist our present-day protection needs and future registration efforts, we plan to review data for at least 2500 historic and architectural resources during FY82 (Obj. #24). The MHD currently reviews for National Register eligibility the resources which citizens submit as candidates for Michigan State Register of Historic Sites designation. Thus we will continue to solicit State Register applications and anticipate that we will list at least 65 new historic and architectural resources during FY82 (Obj. #26).

During FY82 the MHDs regional coordinators and designation assistant will continue to produce nominations in-house--probably more than half of the total FY82 production of Michigan nominations. The regional coordinators will also continue to review, edit, and complete every single nomination that the MHD submits to the National Register.

We will also continue to solicit survey and planning grant pre-applications for registration work and anticipate obtaining at least 5 proposals for this type of work during the FY83 survey and planning grant pre-application period (Obj. #23). However, the furthering of our program goals through survey and planning grant contract work is being greatly hindered by the declining availability of both the federal Community Development Block Grant funds, and, because of Michigan's difficult economic times, the local funds that the cities, counties, and regional planning agencies use for match for our grants. Because of the difficulty of raising the fifty percent match, many fewer agencies than last year submitted Survey and Planning pre-applications--including those with registration components--in the FY82 pre-application period. The implementation of the 70-30 funding provision may help ease this situation in the FY83 pre-application period, but no real improvement is likely until the state's economy recovers.



Tied to the problem of finding potential Survey and Planning subgrantees able to fund the local match is the difficulty we experience in getting our grantees to hire competent (and often expensive) professionals to perform research and prepare adequate nominations. As a result, even in the case of nominations prepared under contract, it is necessary for the staff of the Historic Sites Unit to expend very considerable amounts of time revising, editing, and completing them before they can be submitted. While some further educating of Survey and Planning grantees and consultants in the requirements for the preparation of National Register nominations is to be carried out and will likely ease this problem slightly, the proper solution would be the hiring of additional regional coordinators and/or designation assistants to take on the responsibility of completing nominations.

Because of our active encouragement of the use of the federal Tax Act benefits, we are receiving an ever increasing volume of requests for National Register designations for Tax Act certification purposes. This has become a problem because of our staff's inability to produce nominations rapidly enough to prevent the building up of a backlog of Tax Act-related, registration requests. The best solution, that of adding staff sufficient to handle the demand, appears to be impractical. We are currently investigating as a solution the possibility of establishing a policy that, in the case of properties not yet listed in the Register, we will not process a Tax Act certification application unless an acceptable nomination is submitted with it.

We are greatly delayed and hampered in the preparation of National Register nominations in-house and in giving instruction to subgrantees, volunteers, etc. in their preparation because no final guidelines for the preparation of multiple-resource and thematic group nominations have as yet been published and the guidelines for property and district nominations in How to Complete National Register Nominations have become obsolete or are now incomplete in many particulars. The publication of concise federal guidelines would resolve this problem.

In dealing with the National Register concerning problems with submitted nominations, we note that National Register personnel frequently issue comments verbally, rather than in writing, or, if the comments are in writing, then they are terse and often unclear in meaning. Sometimes, moreover, the advice given by National Register personnel on the method of dealing with a specific problem differs from time to time and person to person and between verbal and written communications. What is needed is a policy of committing all such comments and advice to writing.

The registration of archaeological sites suffered in FY81 and will continue to suffer in FY82 because of short staffing in the Archaeology Unit (the unit lacked one member of its normal, three-person staff throughout FY81 and will likely continue to do so in FY82) and the necessity for using the available staff time for maintaining essential, day-to-day, survey and protection activities. However, the Unit will continue its on-going program of evaluating for National Register eligibility sites for which it has data and anticipates that it will review at least 1000 archaeological resources during FY82 (Obj. #25). As a possible means of resuming the registration of archaeological sites the MHD is investigating the use of student interns to prepare nominations (Obj. #16).



Problems, Needs, and Solutions: Protection

The MHD feels that its problems in the area of protection focus on three different, but overlapping levels of involvement: federal, state, and local.

At the federal level, recalcitrant federal organizations with critical preservation planning functions create the most difficult problems. The MHD repeatedly finds that its efforts at providing comprehensive assistance in the area of protection are futile either because the agencies seek only to evade their survey, registration, and protection responsibilities or lack the staff expertise required to comply in an effective manner. While this problem is borne by the MHD, it clearly is shared with the Department of the Interior and the Advisory Council on Historic Preservation. Also at the federal level, the review of bridge replacement projects continues to give historic preservation the worst publicity. This is due, in part, to the lack of support and early coordination by the Local Government Division of the Michigan Department of Transportation but in main, to the imposition of the Department of Transportation's federal 4(f) environmental regulations which often causes months of delay. Both the delays and the resultant cost increases frequently are attributed to the MHD. In this way the MHD ends up in the middle of very emotionally charged local situations involving numerous local, state, and federal agencies as well as local officials and angered politicians.

At the state level, the problem of recalcitrant state planning organizations duplicates that found at the federal level. The MHDs best efforts at assistance and protection are met by agencies interested only in evading their responsibilities or so short-staffed that expertise in compliance matters is unavailable. Also from the state level, the MHD finds that it is a small division of but one department buffeted about by the problems of a state government reeling under today's economic pressures. For example, budget cuts and personnel losses have limited the MHDs public outreach and education program that once alerted the public to its protection rights and responsibilities. One-to-one relationships with other state agencies similarly devastated by budget cuts are increasingly difficult to maintain and coordinated protection activities suffer. Protection suddenly becomes "reactive" in this type of economic climate where the survey and registration of sites must follow hastily laid protection plans. New preservation legislation or amendments to active laws often receive low priority when a sea of economic recovery needs commands the attention of the Michigan Legislature; conversely, new legislation affecting historic preservation proposed in other areas of state government are often whisked through without the opportunity for thorough MHD review and comment.

At the local level, problems are created by the ever-increasing protection demands of the public at a time when the MHD must cut its program further. As the MHDs public outreach and education program is curtailed, private groups, local governmental units and planning commissions, and individuals receive less technical assistance. As the MHDs publications budget is cut and the availability of federal printed materials is decreased, the MHD finds it increasingly difficult to place up-to-date written information in the hands of its constituents. While some adjustments in the use of staff time and technical materials can be made, the overall quality of the program can only diminish. Also at the local level, the MHD continues

to witness the effects of the lack of federal acquisition and development funds. Whereas one well-placed grant-in-aid could be utilized in the past to coalesce preservation activities in a community and leverage local funds, the MHD now must rely on alternate sources of preservation funding and assistance which, in most cases, are also being decreased or discontinued.

Proposing solutions is difficult when each needs a good dose of funding to be effective. However, we offer here some modified, less-costly solutions.

For the problems cited at the federal level, the MHD would like to emphasize as it did last year that the Department of the Interior and the Advisory Council must take a more active role in making recalcitrant federal agencies shoulder their protection and compliance responsibilities. Most federal agencies have little or nothing to gain from working with the SHPO on protection problems and no amount of state-level coercion, assistance, or pleading can make them respond if they fully know that no federal clout is there to back up state requests. The MHD recognizes that it, too, plays an important role in helping to inform federal agencies of their compliance responsibilities (Objs. #27, 29, 38, 46, 47, 51), helping to keep paperwork and procedures flowing smoothly (GMR #5a and Obj. #38), and helping to mitigate problems as they arise (GMR #5b). But the fact remains that only the Department of the Interior and the Advisory Council have the power to demand compliance. In terms of the problems surrounding historic bridge replacements, the MHD believes that the 106 process is adequate for the protection and mitigation of these resources without the addition of 4(f) proceedings. The MHD strongly suggests that steps be taken at the federal level to accept 106 as satisfying the requirements for 4(f) (Obj. #36 & 40).

For state level problems, the MHD feels that to draw recalcitrant state agencies into line, it must carefully focus its limited staff time on compliance activities. Time must be used to establish or strengthen one-on-one relationships with each agency managing critical planning functions (Objs. #27, 28, 29, 30, 42, 43, 66, 67), continue educational programs that will familiarize each agency with its protection and compliance responsibilities (Objs. #38, 46, 51, 60), and continue to work through the Interdepartmental Environmental Review Committee and the Michigan Environmental Review Board to see that compliance responsibilities are met (Obj. #39). In terms of the problems created by the state's present economic crunch, the MHD can only say that it will continue to use its limited staff time and budget to maintain a modest public outreach and education program (Objs. #46 through 60), work with other state agencies on compliance problems (Objs. #28, 29, 30, 39, 42, 43), and promote new legislation and amendments through the appropriate channels of the Michigan Department of State (Obj. #37).

For local level problems, the MHD and its preservation constituents will continue to promote the re-establishment of the acquisition and development grant-in-aid program and, in the meantime, creatively utilize the alternate sources of funds which still exist. In terms of public education, the MHD will work through its state objectives to keep Clerestory fact sheets (Objs. #46, 51), technical assistance slide shows (Objs. #46, 57), Great Lakes Informants (Objs. #46, 52), Michigan History magazine (Objs. #46, 53), well planned workshops and meetings (Objs. #59, 60), letters, telephone calls, and technical materials available to its constituents (Objs. #28). Most significantly, it will maintain itself as the clearing-

house for historic preservation assistance, news, and information at a time when the economic climate in the state and the nation allows very little recognition or aid for preservation activities (Objs. #27, 28, 29, 30, 31, 32, 33, 34, 35, 38, 41, 44, 45, 46, 54, 55, 56, 57, 58, 61, 62, 63, 64, 65, 66, 68).

The MHD has framed very carefully all its state objectives and supporting activities to promote these protection solutions and those cited in the survey and registration sections. While the MHDs program has been realistically tailored to reflect a faltering economic climate and loss of political support for historic preservation, it feels that its program is one that can survive with its program elements intact.







## Program Overview

### I. Major Accomplishments in FY81

#### Survey

Major survey accomplishments during FY81 were steady and successful progress towards the completion of the county-by-county survey for standing structures and application of the predictive model developed by the statewide archaeological survey in carrying out further survey work in areas subject to high potential development.

Begun in 1977, the statewide archaeological survey has utilized a sampling strategy to develop predictive statements of archaeological site distribution; the completion of this effort was marked by the publication of a Summary Report in February 1981. Field work is now being directed to the discovery of sites in counties that are experiencing rapid development of the kind likely to damage archaeological sites. The predictive model developed has been crucial in establishing the methods for these surveys. Work in this area was done in FY 81 in Douglas, Koochiching, Mower, Sherburne, Itasca, Blue Earth, and Norman Counties.

Also begun in 1977, the state county-by-county survey to locate historic standing structures has progressed at a steady pace, with comprehensive field work now conducted in 53 of the state's 87 counties. Seventeen of these county surveys were completed in FY 81. These surveys have been conducted principally by SHPO staff surveyors with extensive assistance from local historic preservation commissions, county and local historical societies, and other organizations and individuals. The procedure has proved to be an efficient means of systematically gathering a large amount of resource data over a large portion of the state within realistic time constraints. If current staff levels continue, virtually the entire state should be completed during the coming two field seasons. This comprehensive statewide effort has been supplemented in FY 81 by contract surveys in Minneapolis and St. Paul/Ramsey County. City planners and the Heritage Preservation Commissions in each city are directly participating in these surveys, helping to ensure familiarity with and commitment to the structures finally selected for registration.

#### Registration

The process of nominating sites to the National Register at the conclusion of county surveys under the Multiple Resource format has continued to be a useful technique. With the nomination of several properties from one county at the same time, the public - and the State Review Board - is highly encouraged to take into account the specific

historic context which determines a property's significance. During FY 81, the SRB approved 170 properties in 13 county Multiple Resource Nominations, as well as 15 individual nominations. Of course, placement of most of these is pending issue of new registration regulations.

Increased public information on the tax act provisions has resulted in an increase in certification and assistance to projects, and the benefits have been a substantial factor in permitting execution of several projects.

## Protection

A routine - but crucially important - accomplishment in the area of protection during FY 81 has been the maintenance of effective working relationships with the full range of federal and state agencies in conducting project review. SHPO was also consulted by the Minnesota Environmental Quality Board to advise on the incorporation of historic resources in new EQB regulations.

In an attempt to provide information for persons whose professional decisions have preservation protection implications, SHPO addressed several professional groups, including the Minnesota Resort Association, the Institute for County Engineers, the Minnesota Association of Planners, the Minnesota Society American Institute of Architects, the League of Minnesota Cities, and the First Annual Meeting of Minnesota Historical Organizations. Assistance was also given to a variety of groups, including ten official municipal Heritage Preservation Commissions and several groups working to achieve ordinances to establish such commissions.

Dollar grants for preservation projects have continued to emphasize projects with high levels of significance, as well as those with high potential public benefit which would not be eligible for benefits under the Tax Act. Recognizing the need for a solid continuing base of support, priority has gone to adaptive reuse projects which can supply this support. Planning studies for registered buildings for improved energy efficiency have also been encouraged.

## II. Problems and Needs

### Survey

The principal areas of need with respect to survey are 1) continued momentum of the well-established SHPO county-by-county survey program for standing structures, 2) selective, more intensive, archaeological survey, building on the predictive models developed during the first surveys of the statewide archaeological survey and 3) completion of selected local survey efforts in cities that merit special attention. The first two areas relate to the responsibilities of the SHPO in Section 201 (a)(3)(A); the third also relates to the responsibilities in Section 201 (a)(3)(D), (a)(3)(E), and (a)(3)(H).

1) The inventory and National Register documentation accomplished during the county-by-county surveys for standing structures forms the core of Minnesota cultural resource data for historical properties, and needs to be continued towards the achievable goal of completing the entire state. The next year's survey work should concentrate on remaining counties which have projected population gains of five thousand or more between 1975 and 1990 (as determined by the State Planning Agency), and those remaining counties which contain cities with populations of 10,000 or more. There is also a need to continue to survey in a wide range of counties representing different development themes and structure types as delineated in the state's preliminary RP3 scheme of study units.

2) After the development of the general predictive strategy, it is now important for the archaeological survey to gather more detailed survey data for areas likely to see rapid development in the near future. Two key types of development which have potential high impact on archaeological resources are urbanization and agricultural intensification. Using county scores in each of these areas (taken from the State Planning Agency's Notebook of Land Use Projections) those counties which score high in these areas should receive survey priority. Areas subject to a special type of potentially harmful development, and areas identified as subject to other specific kinds of site destruction also need to receive survey priority.

3) Both because of the density of the resources themselves and because of the more difficult subsequent protection strategies, highly urbanized areas need special survey attention. These cities may be the best equipped both to undertake an intensive professional survey effort and to utilize the survey data in their long range planning. In the face of potential declining federal and state support, fostering this self-reliance is especially important.

### Registration

A primary problem area in registration is 1) the potential effect of the owner consent provision on the registration of archaeological properties. There are continuing needs for 2) prompt registration of significant standing structure properties located through the survey program, for 3) encouraging local programs of registration, and for 4) input from the state-level perspective of the SHPO on registration activities done at the federal level and for tax act purposes. These areas all relate to the responsibilities of the SHPO in Section 201 (a)(3)(B); the third also related to Section 201 (a)(3)(E) and (a)(3)(H), and the last also relates to Section 201 (a)(3)(E).

1) The Minnesota SHPO has found a high rate of owner objections to archaeological nominations in the past, in spite of a vigorous campaign to solicit support of such nominations. The new registration procedures, with the owner consent provisions, may effectively block the



listing of most archaeological properties. This problem area needs a frank assessment of the implications of the situation with respect to the objectives of registration.

2) General support for nomination of standing structures, however, has been quite strong, and the method of prompt nomination and registration of surveyed properties needs to continue. This procedure maximizes efficiency and, by registering several properties in a county at one time and working with local groups during the process, helps to encourage understanding and support of registration.

3) Again, because of potential declining support from both the state and federal levels, the strengthening of local registration through Heritage Preservation Commissions is important. This level of registration is further central to both the administration of the tax act provisions and in functioning as a design review process. The Minnesota SHPO needs to encourage local registration. One problem in this process which deserves attention is that of reducing the confusion - of planners, officials, and the general public - on the differences in content and implication for two (or more) lists (local and National Register) of significant historic properties. A second problem is to encourage Heritage Preservation Commissions to consider registration of significant archaeological properties.

4) There is also a need to continue to include the SHPO's increasingly sophisticated state-level perspective on the historical significance of properties and on preservation work standards in matters of registration for tax reform work and federal nomination and determinations of eligibility. This helps in insure uniform application of registration criteria within the state, when the initiator of the registration is at the federal level.

### Protection

Primary protection needs are for 1) continuing prompt review of federal and other projects, as well as providing extensive technical assistance to both contractors and federal agency and other officials in identifying historic properties (SHPO responsibilities in Section 201 (a)(3)(E) and (a)(3)(F)), 2) continuing encouragement and advice on state and local preservation measures (Section 201 (a)(3)(E) and (a)(3)(F)), 3) continuing promotion of public awareness of Minnesota history and its archaeological and built environment, as well as providing information on the National Register, Tax Act, and other tools to encourage preservation of those resources (Section 201 (a)(3)(G)), and 4) continuing assistance with preservation planning work through matching grants (Section 201 (a)(3)(D)).

1) The review process continues as an effective monitor on federal and other projects. The SHPO has the most complete files on cultural resources in Minnesota, and needs to continue in the role of both

identification of resources and comment on impact of projects. A specific problem in the review process which merits attention is in the area of requested surveys. During 1981, the SHPO recommended approximately 105 surveys; of these 25 were completed and 15 were reevaluated. Others were not carried out because of project cancellations. However, more analysis and follow through needs to be done to encourage that those requested are carried out.

2) Potential decline of federal (and state) support for preservation activities points to the need for continued emphasis on state and local protection measures. State legislation and regulation encouraging protection needs to be further analyzed, publicized and possibly embellished. Local protection ordinances (primarily though HPC's) need to be encouraged. A problem which needs attention in this area of local registration is how to provide better and quicker access to cultural resource information.

3) The public needs to be made aware of the preservation process as a whole rather than receiving only occasional exposure to crisis situations. This awareness of the whole process is especially important in much of rural Minnesota, where there is often a strong appreciation of local history but limited sensitivity or concern with preservation issues. Carrying out much public information and education in conjunction with the county-by-county survey program needs to continue, as this procedure allows treatment of the whole process, from an analysis of the county's history through to registration and protection techniques. There is also a continuing need to respond to a wide variety of requests from the public to supply assistance and information to individuals and to a wide variety of groups.

4) Minnesota recognizes that its history is reflected in a wide variety of resources; it has placed over 900 properties on the National Register. When financial resources for planning preservation work are limited, however, it is imperative that priorities are set so that the most important resources are insured effective protection. To this end, Minnesota's planning grant projects need to emphasize work on its National Landmark properties, as well as on properties which may not be eligible for benefits of the tax act.

### III. Supporting Activities for FY82

Supporting activities in Survey, Registration, and Protection are outlined below. The numbers refer to the related problems and needs discussed in the section above. Those activities which are starred (\*) will make partial use of FY81 funds: see separate Attachment A for breakdown of effort.

#### Survey

1) SHPO standing structures surveys will be conducted in Beltrami, Douglas, Carlton, Ottertail, Kandiyohi, Mower, Freeborn, St. Louis,

Hennepin (partial), and Steele Counties (all counties with projected population gains of five thousand or more and/or counties with populations centers of over 10,000) and in Sibley\*, Martin\*, Lake, Wabasha, Renville, Koochiching, and Lake of the Woods Counties (which provide a cross section of resource types and historical development themes based on the state's RP3 study units).

2) Archaeological surveys will be conducted in Wabasha-Olmsted counties, which have high scores in both urbanization and agricultural intensification, and in the \*peat bogs of northern Minnesota (Koochiching County), an area where little is known of the archaeological resources and where intensive development for energy purposes is projected by Minnegasco, Northern Natural Gas, and other energy corporations. The peat bog survey is being conducted in cooperation with the Minnesota Department of Natural Resources. Contract archaeological surveys are also proposed in other counties with high urbanization and/or agricultural intensification scores (Jackson and Martin Counties) and/or in the areas with specific site destruction (areas adjacent to the Red River of the North, where archaeological resources have been subjected to damage of annual several flooding of the Red River, and Western Aitkin-Eastern Crow Wing Counties, subject to increased lakeshore recreational development).

3) SHPO will continue to provide technical/financial assistance to the continuing \*survey of the city of St. Paul (second largest city in the state) and Ramsey County, and follow-through assistance to the survey of Minneapolis (largest city in the state). If local support is available, a local survey of the city of Duluth (third largest city in the state) will be carried out.

### Registration

1) When National Register listing regulations are issued, an assessment will be made of the problem of registering archaeological properties under the owner consent provisions, and appropriate policy established to most effectively deal with the protection of these sites which should result from registration. This process will, of course, take into account the determination of eligibility provisions and other means of registration-protection.

2) \*When listing regulations are issued, SHPO will first submit a backlog of Multiple Resource and individual nominations (including more than 200 sites and districts) to the National Register. Then, registration of properties will continue through a direct follow-through from surveys to nominations and SRB meetings.

3) \*The SHPO will encourage local registration programs by continuing to offer assistance to local units of government in setting up local registration procedures, and through a contract stipulation to insure that registration is carried through after contract surveys are completed. In the latter case, efforts will continue to be made in surveys of both Minneapolis and St. Paul/Ramsey County to develop a more clearly articulated policy of the similarities and/or differences between the National Register listings and the locally registered properties.



\*SHPO will also conduct a session in the National Trust's 1981 Community Preservation Workshop which will stress the importance of local registration of both archaeological and standing structures resources.

4) \*The SHPO will carry through its responsibilities to comment on matters of registration carried out through federal agencies and through the Tax Reform Act.

### Protection

1) \*SHPO will continue to review reports for comment and to offer assistance in the identification of significant resources. Special areas where early contact with project sponsors may be especially helpful (such as the Minneapolis Riverfront and light rail transit corridors) will continue to be identified and assistance offered. Further, a continuing analysis of requested surveys will be conducted with an eye to achieving greater compliance.

2) \*SHPO staff will examine state legislation relevant to preservation and develop a more accessible summary of such legislation. The office will continue to work closely with the Minnesota Environmental Quality Board as they consider proposed regulations to encourage retention of cultural resources. The office will continue to offer assistance in drafting local Heritage Preservation Commission Ordinances; at least five cities are currently considering the adoption of such ordinances. State and local access to cultural resource information will be expedited through continued input of the statewide archaeological inventory and, if funding levels permit, of the National Register standing structure site information, into the Minnesota Land Management Information System at the State Department of Energy, Development and Planning.

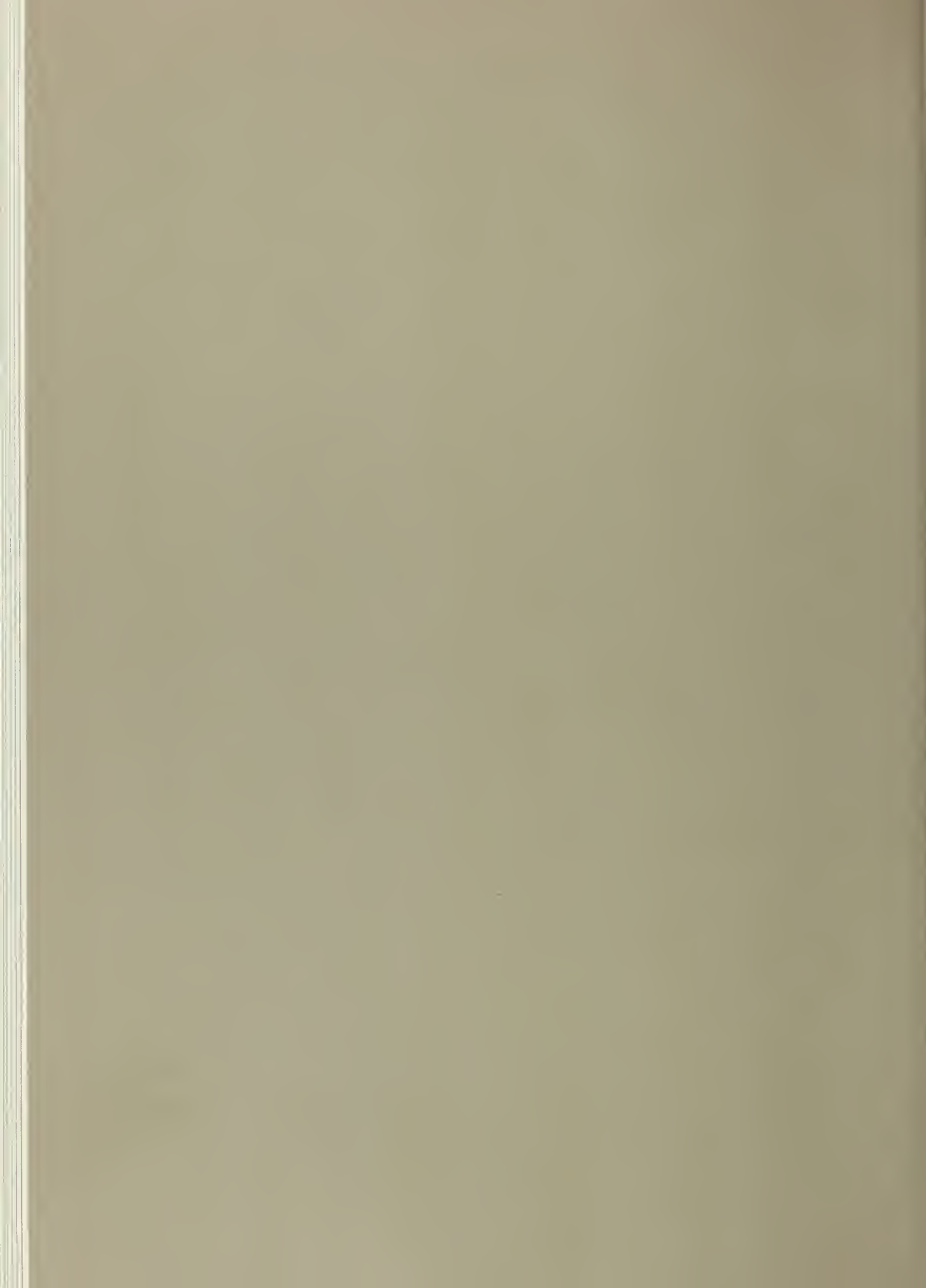
3) \*SHPO surveyors will contact county and municipal officials and a wide variety of individuals and groups by mail and in person during the course of county surveys. The office will continue to participate in professional conferences and in meetings of local historical groups to promote historic resource protection.

4) Planning grants will emphasize protection of National Landmark properties, as well as properties which are not eligible for tax act benefits.









MISSOURI  
PROGRAM OVERVIEW STATEMENT

Despite the continuous impact of troubling economic news throughout the year and the traditional apprehension associated with administrative change in the federal government, the Historic Preservation Program feels that substantial progress was achieved in Missouri during Fiscal Year 1981. Ironically, the same economic and administrative actions which created doubt about the continued existence of the Historic Preservation Program were responsible for stimulating interest in preservation as an economic reality through use of tax incentives embodied in the E.R.T.A. of 1981. Accordingly a major emphasis of program activity during the year focused on servicing and expanding this new sphere of technical preservation interest.

Building on the format developed last year for organizing, recording and retrieving information concerning citizen requests for preservation assistance, the Technical Preservation Services Section refined the program's system of analyzing and codifying this data, nearly completing computerization of the public's needs and interests. A master mailing list and problem and interest-related sub-lists were compiled for computer entry in order to expedite retrieval of specific information, to facilitate targeting the public's preservation needs and identifying currents of interest for planning purposes and to allow timely and continued technical assistance as new programs are developed and technological advances are made.

The level of requests for information concerning rehabilitation tax treatments increased so dramatically that they constituted approximately 80-85% of all citizen requests received in FY 81. Proportionate to this increased interest in rehabilitation tax treatments, staff time devoted to Tax Act review increased substantially.

In reviewing Tax Act rehabilitation work, emphasis remained on the advance review of all plans prior to construction as a means to insure the likelihood of certification by the Secretary of the Interior and to limit the element of risk involved with increasingly requested preliminary certifications. Generally, the review of applications was facilitated because of the maturing of working relationships with principal developers, an increased understanding of the Standards on the part of urban developers, architects and contractors and clarified application instructions and procedures.

As a result of the increased interest in rehabilitation tax treatments, the staff has taken on a new role in identifying properties that are potentially eligible for tax provisions and will explore means to facilitate this new clearinghouse function with the Missouri Board of Realtors. Methods to expedite the process, such as the compilation of lists of contractors qualified to prepare the necessary National Register documentation and architects experienced in rehabilitation, have been and will continue to be pursued. As interest on the part of professionals in rehabilitation tax treatments rose rapidly after E.R.T.A.'s announcement and as the need to address professionals en masse is patent, we are beginning to explore the possibilities of holding seminars concerning real estate development and the tax treatments in conjunction with the Missouri Bar, the Missouri Dental Association, and other professional organizations offering high potential for entrepreneurial interest.



While St. Louis remains the principal area of Tax Act activity, representing about \$29,543,700 of the total \$34,784,000 of rehabilitation work undertaken in the state during Fiscal Year 1981, the office has actively encouraged outstate projects viz., commercial/rental residential rehabilitation in California; scattered rental residential and commercial rehabilitations in Lexington and Carthage; elderly and multi-family residential rehabilitations in Missouri River towns; office rehabilitation in Sedalia; adaptive reuse in Clinton; and several hotel rehabilitations in Kansas City.

In an effort to identify the citizenry's non-Tax Act related preservation needs and to develop appropriate responses to these demands, the Historic Preservation Program collected useful data chiefly through direct public contact. Regional and municipal public meetings and workshops addressing narrow and broad preservation issues were held in conjunction with sub-grantees, local governments, local preservation groups and special interest groups. Impetus for these meetings stemmed from public requests and from the staff, after analysis of currents of public interest discernable in technical assistance requests. These contacts served the dual purpose of providing the office and sub-grantees the opportunity to glean information concerning public interest and to educate the public concerning preservation through media coverage, talks and tours, slide and movie screenings and, specifically, an always well-attended overview of the history of the preservation movement in Missouri.

The Missouri Historic Preservation Program continued to supply non-tax incentive related rehabilitation assistance, including execution of preliminary plans and elevations for the rehabilitation of Lohman's Opera House in Jefferson City and step-by-step advice in the rehabilitation of a Missouri-German house dating to the 1860's, also in Jefferson City. This latter experience provided invaluable documentation on the effects of approved and unapproved rehabilitation methods and persuasive means to encourage owners to use recommended methods, including a masonry cleaning demonstration using proprietary chemical cleaners by the staff. In an effort to further expand our technical resources, a rehabilitation library was compiled and organized, facilitating response to requests for rehabilitation information.

Efforts begun in earnest last year to foster the recognition and protection of the cultural resources of Springfield (Missouri's third largest city and one burgeoning under development pressures), were carried further in FY 81 with a full spectrum of technical assistance to the local government and the private sector, ranging from education of the City staff, Historic Sites Board and Historic District Review Board in the Standards and a broad range of preservation matters; presentations about the Standards to local historic district property owners, contractors and architects; participation in the historic district planning workshop; and work toward the certification of the City's historic district. Additionally, the office played a major role in the development of design guidelines for the historic district.

Recognizing in the state's revolving fund the opportunity to expand available protective mechanisms, serious study was begun of means to inject capital into the appropriation-less fund. The acquisition of properties deemed difficult to market was deferred until sufficient funding could be established. Although property donation has not been ruled out as a means of funding, sale or lease of state-owned historic buildings is considered at present the most feasible means to raise money for the revolving fund. A warranty deed for the sale of a state park-owned house is being prepared.

Analysis of technical assistance requests showed increased interest in preservation from segments outside the established preservation community as well as a shift away from an insular approach to preservation toward the view that preservation is a vital component of a mosaic of intrinsically related issues. The Historic Preservation Program, for example, manned a booth at the St. Louis Home Builder's Show in an effort to provide technical literature and rehabilitation advice to private property owners in and outside preservation districts, contractors and other persons in the building trades. In order to collect data, an abbreviated questionnaire was used to expand our awareness of public needs. In addition, major initiatives were launched to educate St. Louis attorneys, developers, local government officials and planners in preservation tools and objectives via easement and ordinance seminars and participation in a planners' forum on historic preservation with a regional planning commission.

Inasmuch as institutionalized or traditional protection mechanisms have limited effectiveness, we sought out alternative groups and tools that could be channeled to achieve preservation objectives. The Missouri Board of Realtors was recognized as a logical and important ally in directing historic properties to sensitive hands, particularly in instances where industrial development poses a threat to significant resources. Working toward the mutual benefit of preservationists and realtors, a presentation concerning rehabilitation tax incentives, the Rehabilitation Standards and neighborhood and downtown revitalization was made at the Board's annual meeting. At that time, the Historic Preservation Program proposed publication of a separate listing of historic properties for sale statewide, which is presently under development with assistance from our office. Further, realtors received individual assistance in marketing historic properties for sale, such as substantial rural residences and farm complexes, including rehabilitation advice, advertising angles and vehicles, and tax and easement information.

Requests for technical assistance with downtown revitalization increased three-fold over Fiscal Year 1980. To the end of achieving economic revitalization within a preservation context, the Historic Preservation Program and the Missouri Division of Community Development are developing a program of technical assistance hinging on preservation and community development tools and incentives, education in community and architectural design, promotion, and the planning and implementation of a rejuvenation program. Initially assistance will be offered to twelve communities deemed to have an appropriate mix of public/private sector cooperation, architectural and historical resources. After the program has been presented to all twelve communities, presentations will be made to other targeted communities possessing fewer of the requisite characteristics. Assistance has been and will continue to be rendered to other interested municipalities, such as Perry and Liberty. The Historic Preservation Program is assessing the possibility of adding a preservation component to the Division of Community Development's Five Star and Certified City programs, two community betterment programs encouraging self-help.

In the absence of legislation mandating state agencies to consider cultural resources in their undertakings (drafted, but not yet endorsed), the Historic Preservation Program concentrated on instilling such consideration in the state agency with the largest land holdings, the Missouri Department of Conservation. Although the department has been resistant to such considerations in the past, some headway was made last year in regard to the preservation of Wolf-Ruebeling House of 1857 in St. Charles County and the Henry Clay Dean House (early 1870's) and dependent barn (1850's-1860's) in Putnam County.



Proceeding on the basis that the rehabilitation of the Ruebeling House is desirable and economically feasible, the Historic Preservation Program has, with the assistance of the Division of Youth Services and the State Parks field staff, taken measures to stabilize the property, including demolition of an unsalvageable frame addition and boarding of the apertures. A complex lease agreement has been drawn up whereby the Historic Preservation Program would lease the property from the Department of Conservation and the HPP in turn would sub-lease the property to a person who would undertake rehabilitation; a search is being made for a suitable tenant. In regard to the Dean property, the Historic Preservation Program counseled a local historical society in leasehold and acquisition possibilities. As progress in fostering the department's consideration of cultural resources has been painfully slow and extremely narrow in focus, the Historic Preservation Program, with lobbying assistance from preservationists statewide, will urge greater identification and protection of cultural resources on Department of Conservation lands.

In addition to joint projects with the State's Division of Community Development and the Department of Conservation, the Historic Preservation Program has provided assistance to projects involving other state and federal governmental agencies, such as design consultation in regard to the Stupp Memorial Garden, Tower Grove Park, St. Louis (LWCF); rehabilitation and related technical assistance regarding the relocation of log cabins from the Cannon Dam project area (Army Corps of Engineers); and energy retrofitting consultation (state's Division of Energy). Additionally, the Historic Preservation Program continued to coordinate closely with the Missouri Heritage Trust. While the Missouri Heritage Trust was in a state of transition between executive directors during the first three quarters of the past fiscal year, the quarterly newsletter continued to serve as an effective channel of communication for the state preservation community, including submissions by the Historic Preservation Program staff. Under new leadership, Missouri Heritage Trust is broadening dramatically the statewide preservation constituency by absorbing the membership of existing preservation groups and assisting in the creation of new, local preservation groups.

The Historic Preservation Program and Missouri Heritage Trust, in cooperation with Historic Hermann, conducted a well-attended day-long seminar exploring the problems of historic masonry for Missouri Heritage Trust and Historic Hermann membership and local architects and contractors.

The closure of the National Register early in the year was discouraging to both the program staff and citizens involved in the survey and subsequent nomination processes, nevertheless the identification of cultural resources through Survey and Planning grant-in-aid funds remains a major effort of this office, one which has progressed to a high and effective level since the establishment of the Missouri Historic Preservation Program. Ongoing relationships have been established with Regional Planning Commissions, several colleges and universities, and with private not-for-profit preservation groups to perform surveys and prepare National Register nominations. This has resulted in what is effectively a network of regional offices which provide basic preservation services to their constituents.

Although Missouri has continued to prepare and process nominations for ultimate submission to the National Register, it is obvious that the re-opening of the National Register is simply essential to the effective implementation of the National Historic Preservation Act.

Review and Compliance activities continued through fiscal year 1982 as a major program activity. The Review and Compliance Section receives notification of impending projects through A-95, 404 permit applications, and other federal permit procedures to determine if survey is necessary, or if the project impacts known resources. The Historic Preservation Program Guidelines set standards and formats to be followed which delineate appropriate documentation and level of detail for every phase of CRM investigations.

All submitted documentation, i.e. CRM reports, site forms, etc., are filed in the state Inventory of archaeological, historical and architectural data.

A schematic filing system has been completed for this Historic Preservation program central Inventory file containing data on all known cultural resources within the state; including National Register of Historic Places, Determination of Eligibility properties, and so forth. This system has further been expanded by the establishment of a direct computer tie line to the Archaeological Survey of Missouri. This has enabled the Historic Preservation Program to respond to compliance requests at a rate approximately 100% quicker than previously.

Incorporated into the central Inventory file system during fiscal year 1981 has been a U.S.G.S. Map File indicating all Cultural Resource Management and grant surveys, and/or areas of high site probability. This is also cross-referenced to the CRM/Survey report to which it applied. A microfiche file containing all Archaeological Survey of Missouri site forms has also been acquired, giving the Historic Preservation Program copies of original site registration forms going back to the establishment of the Archaeological Survey of Missouri during the 1930's. An effort has also been initiated to study the feasibility of the computerization of all CRM and Inventory data. This has so far resulted in the purchase of a word processor, enabling the Historic Preservation Program to continually update National Register of Historic Places and Determination of Eligibility indices. The consolidation of the Historic Preservation Program central Inventory system, containing all its elements (U.S.G.S. Map File, microfiche file, Library and data) into a state centralized repository and research facility has not only enabled our staff to give better service, it has greatly enhanced the ability of professional researchers to conduct independent work in these files.

Since implementation of this system use of the Inventory by outside researchers has increased from two per month last year to twelve per month in fiscal year 1981.

The Determination of Eligibility process is coordinated through this section, which provides guidance and information concerning the relevant regulations and required procedures to agency clients. This section is also responsible for the technical aspects of the preparation of the SHPO comments on eligibility and for determinations of effect, and the formulation of MOAs.

The review and compliance section, in coordination with federal and local agencies, (i.e., REA, OSM) has generated systematic intensive surveys, and regional overviews for large scale, federally involved or funded projects. This results in further Inventory data and is complementary to the statewide preliminary survey strategy for pre-historic cultural resources developed by the Missouri Association of Professional Archaeologists in association with the Historic Preservation Program.



The Historic Preservation Program remains concerned about, and committed to, inner-city and minority related preservation problems and will continue to pursue effective programs for dealing with these problems. Fiscal year 1981 carryover funds will be used to fund projects in five inner-city and/or minority neighborhoods in the state's first and second largest cities. All five projects will be designed to promote commercial re-vitalization of the subject areas using the ERTA of 1981 for fiscal leverage. (These projects are described in detail in Attachment 2"A", Fiscal Year 1982).

Likewise, the Historic Preservation Program finds the certified cities concerned to be of considerable potential and is reserving 10% of forthcoming federal monies (as required) to fund municipal participation in such preservation activities.

In summary, the Missouri Historic Preservation Program has seen continued growth of preservation activity in fiscal year 1981. There are, however, problems that continue to beset us, and for which solutions must be found. Those of outstanding concern are as follows:

1. Uncertainty of federal funding and the hesitancy and fluctuating nature of federal leadership.

We hope that federal funding will continue to be available since it is unlikely that any other source of equal magnitude can be developed. In any case we will be attempting in fiscal year 1982 to develop as large a degree of fiscal independence as is possible, as detailed in Attachment A. Likewise we hope that re-organization of the federal bureaucracy will be completed soon with consequent consistency of direction.

2. The closure of the National Register.

We can only hope for early resolution of this matter by the appropriate federal authorities.

3. The lack of understanding of the Review and Compliance process by local government agencies to whom such responsibility has been delegated by a funding federal agency. This one area creates more misunderstandings and hostile reaction to our program than any other factor.

We have begun to address this problem by creation of a project questionnaire which federal agencies provide to their clients as a part of their application process. This causes an early awareness of the review and compliance process and allows our staff to interact at an earlier date with the local agency, thus avoiding time-frame conflicts. We will continue through workshops, planning meetings and so forth to alert more local officials to their compliance responsibilities. We also think, but have little way to influence, that it would be better if federal agencies did not so readily "duck" this responsibility by wholesale delegation to sub-grantees.

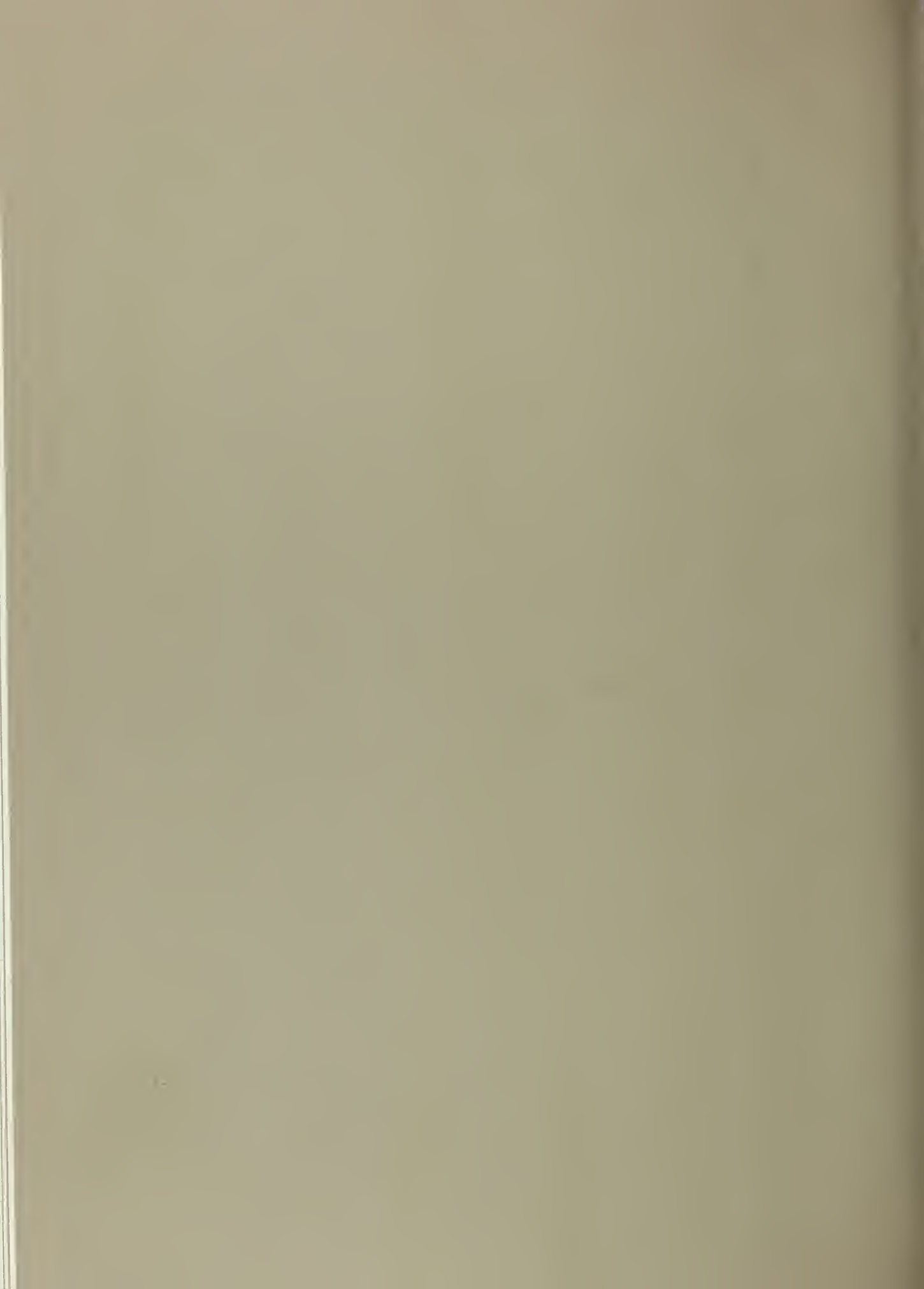
4. A lack of understanding of the Standards on the part of developers, architects and contractors, cited in last year's summary of program activities, persists. This problem is particularly on the increase outstate, due to the lack of outstate architects and contractors sensitive to and knowledgeable about rehabilitation methods and the fact that volume of outstate rehabilitation projects is increasing.

In St. Louis, increased familiarity with approved rehabilitation techniques and concentrated efforts on the part of the Historic Preservation Program to educate architects and contractors in the Standards has already accounted for a noticeable improvement in the caliber of projects reviewed in fiscal year 1982. We will continue our public education and awareness campaign as detailed in Attachment A, and will emphasize such activities in rural out-state areas and with less experienced owners, contractors and redevelopers.









## PROGRAM OVERVIEW FY 82

The Nebraska State Historical Society was designated as the State Historic Preservation Office by action of the State legislature in 1967 following the passage of the National Historic Preservation Act of 1966. Initially the function of the Preservation Office was carried out by one Society staff member, additional staff members were hired until the Preservation Office met the requirements set forth in the federal code. In recent months there has been a decline in the staff. The position of architectural historian is vacant and the historian's position is filled on a half time basis. The position of Deputy State Historic Preservation Officer - grants administrator is also vacant. New staff has not been hired to fill these positions because of the uncertainty about continued funding and the future of the federal historic preservation program. If funding is resumed and the program continues these positions can be filled.

It has been our philosophy that survey is the key component in the program. In the early days of the Preservation Office nominations were written for "consensus significant" properties and surveys were carried out in areas of known significance. As the program progressed a more logical strategy was developed. The state has been divided in survey units based upon settlement period, landform, and cultural-ethnic characteristics. Within this framework surveys can be designed to sample the units thus providing a more accurate cross-section of the state's resources. This kind of survey is extremely useful in assessing the potential for adverse impacts and providing comments for the initial stages of environmental review.

During FY 1981 survey time was reduced and concentrated in areas of high potential and high local interest. This reduction provided an opportunity to catalog a welter of miscellaneous data collected during the early years of the Preservation Office. All of the records generated by this office could now be placed in the State Historical Society Archives and continue to be a useful resource without a long delay for accessioning. This seemed to be an appropriate undertaking considering the uncertainty about the future of the preservation program felt during most of FY 1981.

A high priority survey for FY 1982 is Scotts Bluff County. The increasingly rapid growth, especially in the city of Scottsbluff could destroy significant cultural resources. A comprehensive survey would assist in planning for the development of this community. Scottsbluff is also historically important in that it contains the major concentration of Nebraska's Spanish speaking peoples.

The Office of Historic Preservation has received a request from private citizens in the city of Norfolk to survey their community. We feel this request from the private sector should not be ignored and therefore place a high priority on the Norfolk-Madison County survey. Norfolk is the tenth largest city in the state and is undergoing fairly rapid expansion and development.

The Nebraska State Historical Society has had an active archeological survey program for most of this century. The results of this work have made assessments of project impacts possible in some cases. In certain cases the data can also be used to estimate the likelihood of archeological sites being present in a given area but this kind of prediction must be made with extreme caution.

It has been necessary to concentrate the most recent survey efforts in threatened areas, such as housing developments, wastewater treatment facilities and soil conservation areas. These are expected to continue along with a new need for surveys resulting from energy related projects. A coal slurry pipeline is being proposed and if built might cut diagonally across the western half of the state. In recent months uranium explorations have begun in the extreme northwest corner of the state amid rumors of world class deposits. These are two areas which must be considered in a plan for future preservation work. At the present it is not possible to estimate the exact size or location of surveys to be most profitable. A survey of these threatened areas would also provide planning assistance to other involved state, local and federal agencies.

A concerted effort has been made to establish and maintain a contact person in other agencies who has acquired some knowledge of the preservation program. Because of changes in personnel, this is a continuing activity but at present we feel we have contacts in all of the critical government agencies as well as some of the larger businesses which become involved in historic preservation. Educational leaflets, memos and letters have helped to establish these contacts and inform them about historic preservation.

Recently questionnaires about the Historic Preservation program were sent to county and municipal governments. The response was not heartening. Only 25% responded of which only 60% felt there were significant properties within their jurisdiction. We are not prepared to interpret this poor response especially since private citizens from some of these governmental jurisdictions have volunteered information about significant sites in their area. Contact with smaller agencies must be pursued since they appear to have the least information about historic preservation.



As a result of our questionnaire-survey we feel another profitable means of contact, especially in the smaller cities, villages and thinly populated counties which abound in Nebraska is through an effort combining contacts with local governments and private citizens. Since the Nebraska State Historic Preservation Office is small we will have to look for assistance from interested private citizens. One way to make this need known is through the continued publication of the Cornerstone the bi-monthly newsletter. Offers of aid have been received from people in the Norfolk area and this survey will be carried out.

Another major portion of the historic preservation survey will be carried out through contracts with qualified agencies or organizations. Two thematic surveys and two area surveys are planned.

Thurston County in northeastern Nebraska affords an opportunity to examine cultural resources of a white population as well as that for a major portion of the Omaha and Winnebago tribes in the state. The proposed survey would include both archeological and architectural sites.

The Omaha have lived in the general area at least from the early historic period. Archeological remains from this period could be present and there is some possibility that a survey would prove new clues to the difficult problem of defining prehistoric Omaha sites. The Omaha settled permanently in what is now Thurston County in 1854 when a reservation was established. The Winnebago, an eastern tribe, began migrating to the reservation a few years later. Archeological remains from this era are suspected from archival records, but have not been confirmed by field work. While settlers were relatively recent occupants of the county and significant archeological sites would not be likely.

Beyond cursory "windshield surveys" the standing structures in Thurston County have not been examined. Traditional Omaha or Winnebago structures are not being used with the possible exception of some with a ceremonial or religious function. A survey would make possible a comparison of building styles selected by the native Americans and their white neighbors.

A second area survey would center on Fort Robinson in western Nebraska and would be primarily for archeological sites. An intensive survey of the National Historic Landmark and immediate environs would locate any surviving sites directly related to the fort. Surveys of selected high potential areas and also of randomly selected plots could be useful in providing a preliminary predictive model for the landmark area. This kind of information would be extremely useful to the Historical Society as well as to the Nebraska Game and Parks Commission, the U.S. Bureau of Land Management and the U.S. Forest Service in their increasing involvement with companies seeking leases for oil, gas and uranium exploration leases.

One of the two thematic surveys would examine bridges. This would provide data on a class of structures for which very little information exists. One bridge is enrolled in the National Register and casual observations suggest that others are eligible. This office has not had the expertise necessary for an adequate study of bridges therefore it would be best suited to be done under contract with those who have the appropriate knowledge. A clear understanding of the various "styles", their distribution and National Register potential would also assist the Federal Highway Commission and the Nebraska Department of Roads in their planning processes.

The final contractual undertaking would be a survey of extant flour-mills, and related structures. This survey would expand the work initiated by the curator of Neligh Mills branch museum. As a predominately agricultural state, flour milling was a vitally important industry in Nebraska but these buildings are disappearing at a rapidly increasing rate. An effort must soon be made to record the surviving structures before all physical remains of the industry are gone.







## PROGRAM OVERVIEW

MAJOR ACCOMPLISHMENTS IN FY 81

All of the activities reported in Attachment A of the FY 81 completion report may be considered major accomplishments in view of the flux and uncertainty which characterized the federally funded aspects of the state historic preservation program the past fiscal year. The overall impact of the late appropriation, apportionment, work plan approval, subsequent rescission of a portion of Ohio's apportionment and the zero funding recommendation of the administration after the tedious process of passage of the 1980 Amendments to the National Historic Preservation Act is discussed in the problems section of this overview. Nonetheless, there were real accomplishments.

In the area of planning the major accomplishment was the substantial progress made in the development of a comprehensive state plan. Aided by a grant from HCRS and the award of a HUD 701 Planning Grant from the state, 25 archeology study units were refined and operational and management plans were written. Information concerning the state's historic and architectural resources has been organized into 15 thematic and urban study units. Additionally, a format for recording and reporting information on resources in incorporated villages, towns and cities has been devised which allows for a clear, concise report for planners and local decision makers. Prototype study units have been presented to a variety of public planning bodies in order to get feedback from them on the usefulness of the urban study unit form.

There was also increased locally-initiated survey activity as evidenced by a survey undertaken by the Old House Guild in Sandusky which produced over 1,000 inventory forms and completed a multiple resource nomination. Survey & planning funds were combined with some from the Joint Program of the Ohio Program for the Humanities and Ohio Arts Council to support a survey of vanished black communities in western Ohio. Some funds were also directed toward the photographic recording of early 20th century steam engines in Youngstown, a major steel center in the Ohio Valley. In Bowling Green a team of seven graduate students in American Studies worked with local high school students, members of the Fayette Community Arts Council, and other citizens to identify and record the village's historic resources. The students then worked with the Fulton County Regional Planning Commission to incorporate the information on historic resources into the comprehensive plan being developed for Fayette.

A survey of archeological sites near the Ohio River in Meigs and Washington counties was undertaken jointly by the Ohio University with a survey & planning

grant from the Ohio Historic Preservation Office. The project uncovered information in an area that had received little attention from professional archeologists, and documented sites within an area that is subject to heavy development pressures including gravel mining, factory construction, suburban expansion, and coal loading facilities. The project, which involved many area residents, used information provided by local collectors and sought to keep area residents informed of the project and the importance of the information obtained.

1981 was also characterized by a high level of coordination with federal, state, and local agencies and organizations. These activities are noted in objectives 7, 9, 11, 25, 31 and 32 of the 1981 completion report. Coordination with state agencies included the writing of an urban revitalization manual and presentation of a two day workshop with the Ohio Department of Economic and Community Development and two workshops on historic resources at land use planning conferences put on by the Ohio Department of Natural Resources. Statewide agency participation included quarterly meetings with the Ohio Downtown Association, participation in the annual meetings of the Ohio Planning Conference, the Conference of Mayors, the Ohio Conference of Community Development Directors, and frequent articles in the publications of the Ohio Planning Conference and the Ohio Municipal League. The office also completed its participation in the Negotiated Investment Strategy process, a prototype effort arranged by the Kettering Foundation to get federal, state, and local agencies to list areas of mutual concern and to develop strategies to address them. The process carried out in Columbus resulted in, among other things, the passage of local landmark legislation (formerly defeated in City Council), the hiring of the first preservation planner on the city planning department staff, and the creation of a local landmarks commission. The office also began a series of articles on historic bridges in the quarterly Ohio County Engineer published by the County Engineers Association in Ohio. A staff member was appointed to the Advisory Committee for the Historic Bridge Inventory currently being undertaken by the Ohio Department of Transportation.

Other local government coordination included a contract with the city of Cincinnati to serve as a local preservation office. This is, in essence, our first "certified local government." Cincinnati passed excellent local legislation, named a commission and now has four professional preservation planners on its city planning staff to address local preservation issues. In Cleveland we helped to fund a survey & planning project which resulted in the marking of all inventoried properties within the city limits on the city's planning maps. Further, architectural rehab drawings for key buildings in the downtown area were produced to stimulate the continued use of these structures. We also participated in the first Ohio Conference for Local Landmarks and Historic District Commissions sponsored by the Cleveland Landmarks Commission.

In Toledo, the office and regional office assisted with the writing and implementation of local landmarks legislation.

Despite sagging office morale over the Administration's zero funding recommendation, May was celebrated as historic preservation month. Using the theme, "Celebrate Ohio's Neighborhoods," we were able to show that preservation was alive and well in Ohio. These activities included:

- \*Governor's proclamation of May as Historic Preservation Month
- \*A preservation month poster
- \*Distribution of over 23,000 copies of a preservation activities calendar listing over 115 events
- \*Distribution of calendars, posters and bibliography of related books to each public library in Ohio
- \*General news releases and a public service announcement to major radio stations
- \*An article on Preservation Month in Cities & Villages, the publication of the Ohio Municipal League
- \*The use of historic preservation as the theme for the May issue of Echoes, the monthly newsletter of the Ohio Historical Society
- \*An activities table at the museum for school age groups who visited during May

The Historic American Buildings Survey in Ohio, an exhibit of forty photographs and measured drawings of Ohio architecture jointly sponsored by the office and the NAER is being circulated throughout Ohio by the Ohio Foundation on the Arts, Inc. through its Statewide Arts Services program.

Amidst everything else, the office was audited for the fourth time, and, at long last, prior outstanding audit findings have been resolved.

From June onward a major planning effort has been undertaken to establish objectives and priorities for the 1980s and to find means to address them. These efforts are discussed later in the Overview Statement, but must be mentioned here as a major accomplishment because the effort allowed the office to establish priorities and give direction to the office's activities in a period of uncertainty and change. We feel that it will, ultimately, result in some positive changes and a strengthening of the state program.



ASSESSMENT OF PROBLEMS/NEEDS FOR SURVEY, REGISTRATION, AND PROTECTION, DOCUMENTED BY STATISTICAL OR OTHER EVIDENCE AND DISCUSSED IN RELATION TO BROADER STATE ISSUES WITH REFERENCE TO THE RESPONSIBILITIES OF THE SHPO.

As earlier mentioned, most of the state's problems/needs areas stem from the instability of the 1981 and 1982 federal funding issues. Added to this, however, are problems created by the "closedown" of the National Register while new regulations are approved which are in keeping with the 1980 Amendments to the National Historic Preservation Act. The late approval of our final work program delayed implementation of the survey & planning components and the rescission of funds effectively cancelled initiation of all new A & D projects. This caused a significant loss of credibility with those we had asked to submit projects for possible funding. When it was learned that the Administration budget called for no 1982 funds to the states, our proposed budget was revised so that funds might be available to carry out some functions in FY 82 and to give us time to review our priorities for expending available federal funds.

More importantly, insecurity over continued funding has created a bit of a morale problem, especially within the regional preservation offices. In June we were forced to notify all regional offices that their contracts would not be renewed when they expired on 9/30/81 and that we would operate without regional offices until such time as they could be refunded by federal, state, or private sources. This effectively meant that the regional officers had to devote a fair share of their remaining time to the "close-down" of the offices and final reporting. In varying degrees the funding issue has effected all of the staff, and subsequently, resulted in a somewhat reduced level of productivity. It has been hard to keep moving forward and to project a positive image.

Other problem/needs areas remain the same as in the past - the amount of survey left to be completed, getting local decision makers to contact us early in the planning process, pressure from owners to nominate properties to the National Register, and lack of cooperation in the review & compliance process by some agencies at all levels. These concerns, while not new, seemed to be heightened by the impending funding crisis and the lack of direction in regulatory reform. It is safe to assume that zero federal funding will affect the SHPO's ability to continue to coordinate survey, maintain the inventory, prepare and use a comprehensive state plan, provide technical assistance services and fund subgrant projects (responsibilities delegated to the SHPO in the 1980 Amendments) in 1982.

In time, state funding and private support may be found to continue these efforts, but additional state funds will not be available before 1983 (if then) because of the state biennium budget process and the state's own budget problems. Since the office has not spent a substantial effort previously to get private support, an effort will have to be made to "gear-up" a development office function.

In the area of National Register nominations the office has been, and will likely continue to be, contacted by numerous property owners who wish to have their properties nominated so that they can take advantage of the federal tax act provisions for rehabilitation. Without continued federal funds, Columbus staff may be reduced in FY 82, regional offices will be closed and our ability to process these, as well as the normal amount of nominations, will be lessened. At the present time we have over 100 nominations awaiting processing. These have accumulated since the close of the Register last fall.

The closing of regional offices, which have served as our "eyes and ears" in the field, will affect our review & compliance and technical services functions as well as our ability to survey and document cultural resources. The regional offices have served as an early warning system, as well as a source of local assistance within numerous communities. If block grants to the states are considered state funds once they are received, funded projects will not be subject to A-95 review. Thus an alternate review or monitoring system must be established to accomplish the SHPO responsibility to cooperate with federal, state, and local government in the protection of cultural resources.

HOW NEEDS WILL BE MET, INCLUDING ESSENTIAL ACTIVITIES WHICH WILL BE CARRIED OUT IN FY 82.

The Ohio Historic Preservation Office has undertaken a comprehensive, four month planning process to address the problem/need areas mentioned in the preceding section. During that period the office identified major objectives and has had public input into prioritizing activities to meet these objectives. These basic objectives include the SHPO responsibilities which are listed in the 1980 Amendments (See attached Program for the 80s). The depth and scope of these activities will depend upon the availability of continued federal funding. At a minimum, unobligated FY 81 federal funding will be used to retain sufficient Columbus staff to continue essential survey, registration and protection activities while additional state and private funds are sought to implement a renewed, full scale program in FY 83.

The overall goal of the program will be to promote a strong preservation ethic in the state. This will include efforts to involve and certify both local programs (private or public nonprofit activities) and local governments to assure that preservation issues are addressed on a community basis. The state office will provide technical services and coordinate these activities so that regional and state preservation priorities are met and the statewide constituency for preservation is strengthened and broadened.

Six major program elements will be used to address the state's major objectives and the SHPO responsibilities. These are the SHPO and staff, the state advisory board and regional preservation councils, an academic research program, certified local governments, certified local programs, and regional coordination offices.

SHPO AND STAFF: The current staff will be retained as long as is feasible in order to address basic survey, registration, and protection needs and to maintain a certified state preservation office. The two staff vacancies will not be filled until funding is assured. If no additional funds are secured by Spring, 1982, further staff cutbacks will have to be made. Basic survey activities will include primarily efforts to refine the state's comprehensive state plan and the distribution of the plan to key local decision makers in prime impact areas of the state. The state inventory will be maintained and information distributed to those who request or need such data. National Register nominations will be completed on a priority basis as identified by a comprehensive plan with properties of National Historic Landmark and statewide significance considered first. Assistance will be given to others in the preparation of nomination forms, including property owners seeking to use tax provisions for rehabilitation. Protection efforts will include the monitoring of existing A & D grants projects, providing technical preservation services to endangered buildings and sites, and coordination with federal, state, and local agencies to fulfill (A)(F) and (G) of the SHPO responsibilities listed in the 1980 amendments. Due to staff limitations, the comprehensive state plan will be used to help identify those projects with the highest priority for attention, including those which have potential to serve as demonstration projects.

STATE ADVISORY BOARD / REGIONAL PRESERVATION COUNCILS: The state advisory board will continue to review National Register nominations and advise the SHPO in preservation matters. The board meets approximately every 6 weeks. In addition, Regional Preservation Councils are being considered to assist the State Review Board and the SHPO in establishing regional preservation priorities and assisting regional coordinating offices when they are reestablished.



ACADEMIC RESEARCH PROGRAM: To assist the state office with survey and research of areas identified in the comprehensive state plan, colleges, universities, and research institutions will be contacted and offered an opportunity to select topics for research as projects for classes or graduate student theses. This list of topics will be generated from information needs identified during the comprehensive state planning process. Such studies will contribute to the refinement of the comprehensive state plan and will also serve to involve additional professionals in historic preservation work. In some instances, students or researchers may also undertake National Register nominations as part of this program. If funds become available, stipends may be offered.

CERTIFIED LOCAL GOVERNMENTS: It is anticipated that at least three local governments will be "certified" in FY 82, even if no federal funds are available for passthrough. The state office considers it essential to get local governments to be active participants in the identification, recording and protection of local resources and will work with as many local governments as possible to see that they move toward implementation of local legislation and professional staff development. If funds are available, a minimum of 10% of the state's allocation will be passed through to certified local governments or those seeking to be certified.

CERTIFIED LOCAL PROGRAMS: In addition to certified local governments, the state office intends to encourage the initiation of local preservation projects by a variety of private nonprofit and public organizations, including local historical societies, preservation organizations, and local governments who do not wish to implement legislation or commissions. A description of the certified local program concept and its benefits is currently being drafted.

Implementation of the above five program elements will mean that the SHPO office will be able to meet (A)(B)(C)(E)(F)(G) and (H) of the listed SHPO responsibilities at a minimum level without FY 82 funds and thus could maintain a certified state office. It is emphasized, however, that it will be minimum level of activity and that statewide coverage would be limited. The state program of federal assistance (responsibility (D)), then, would consist mainly of technical services since no federal funds would be available for subgrants. Of necessity, the time of some staff persons would be partially directed toward securing additional state and private funding.

If federal funds are available in 1982, the sixth, and in many ways most essential,



program element could be implemented that is, the continuation of regional offices. If these can be implemented, the state's ability in the above areas will be greatly increased through the ability of the regional officers to stimulate, direct and coordinate local preservation activities. A minimum of \$250,000 is needed for this program element. This amount would fund five, two-person (archeology and history/architecture expertise) offices (see attached map). Any additional federal funds beyond the amounts needed to staff the SHPO office, regional offices, and passthrough to certified local governments (or those seeking certification), would be prioritized in the following manner:

1. continuation and refinement of the comprehensive state plan, including grants for survey and research, and distribution of the plan to key state and local decision makers.
2. public education and awareness projects designed to promote the ethic of historic preservation as part of the planning process. This would include printed materials, workshops, seminars, and technical assistance programs suitable for state, regional, or local levels. Planning grants for endangered properties would also be considered.

While the Ohio Historic Preservation Office will continue at a minimum level for about nine months without additional federal funding, its capability beyond that is uncertain. Therefore, the major emphasis for the program in FY 82 will be 1) to involve and train more organizations and individuals to be active participants and to instill, at the local level, a concern for the protection and continued use of our historic resources and 2) to identify alternate sources of continued long term funding for both program administration and specific projects. This will include a greater effort to secure additional state funds and to secure legislative changes at the state level to assure a state mandate to maintain a preservation program in the future. If these efforts are successful they will assure the continuation of the Ohio Historic Preservation Office at a maintenance level. Additional federal funds would then be annually used to fulfill the SHPO responsibilities as listed in the FY 80 Amendments and state funds would be used to address specific statewide objectives.

# The Ohio Historic Preservation Program

## Objectives for the 1980s

The Ohio Historic Preservation program which developed over the last decade grew largely in response to available federal funds and addressed priorities and goals designed to carry out federally mandated objectives. Over the past months it has become evident that the federal presence, both in terms of funding and providing direction, will be greatly reduced in the 1980s. Recognizing the limits of the resources which will be available to it in the 1980s, the staff of the Ohio Historic Preservation Office has evaluated what it feels are current and future directions which Ohio's historic preservation program must address.

One of the major goals for the 1980s will be to promote a strong historic preservation ethic within the state which assures that preservation issues and concerns are addressed at all levels, by both public and private sectors. Secondly, the Ohio Historic Preservation Office must work to develop mechanisms to facilitate, coordinate and encourage others to undertake the protection and preservation of Ohio's cultural resources. This will mean building stronger alliances with organizations, groups, and individuals whose actions affect cultural resources. Over the next year the office will be in transition between current programs designed to meet federal objectives and the development of programs which address more directly the preservation needs of Ohio. As the federal presence is reduced, the role of the Ohio Historic Preservation Office should become one of providing technical assistance and encouraging and coordinating the efforts of others, working with them as partners in the enhancement and revitalization of neighborhoods, villages, cities and sites throughout the state.

The 1980s will present many challenges as well as opportunities for historic preservationists in Ohio. The Ohio Historic Preservation Office staff has defined six major areas (objectives) which they feel should be addressed in order to provide a comprehensive, statewide, and cost effective program. These are designed to build a mechanism which fosters an understanding and cooperation among various groups whose actions or policies affect the cultural environment. As it is implemented, the program will have the capacity to strengthen and broaden a statewide constituency which can address the preservation and protection of Ohio's cultural resources - its archeological and historic sites as well as individual buildings and historic districts. The six core objectives which we feel need to be addressed are:

### 1: MAINTAIN AND STRENGTHEN THE IDENTITY OF THE OHIO HISTORIC PRESERVATION OFFICE

As the program changes it will be necessary to retain the identity of the office and to let the public know what services and programs are available. This will include:

- a. Maintaining and strengthening the current coordination role of the office.
- b. Continuation of traditional services including processing of National Register nominations, Tax Reform Act applications, monitoring of acquisition and development projects and providing technical services.
- c. Maintaining a physical presence throughout the state so that all activity is not focused in Columbus.
- d. Implementation of a process which allows for the continuing evaluation of programs and activities in order to respond to changing state needs.

## 2. PUBLIC EDUCATION AND AWARENESS

The education and awareness activities of the program should include an effort both to communicate to the public what the Ohio Historic Preservation Office does and to develop a strong preservation ethic in the state. This effort would involve:

- a. Development of materials of a general nature to explain the Ohio Historic Preservation Office and its functions.
- b. Development of materials to promote the "values" and "benefits" of archeological and historic preservation.
- c. Coordination of programs with relevant state agencies whose activities affect cultural resources or whose programs may overlap with those of the Ohio Historic Preservation Office.
- d. Coordination of programs with relevant statewide organizations whose activities or interests affect or should address the preservation of the state's cultural resources. This would include the Ohio Municipal League, The Ohio Conservation Foundation, the Ohio Association of Realtors, The Ohio Planning Conference, the Association of Community Development Directors, The Ohio Archaeological Council, The Archaeological Society of Ohio, and other organizations.
- e. Giving of assistance to local communities to develop historic preservation legislation and commissions leading to the certification of key local governments or local preservation programs.
- f. Development of demonstration projects with other organizations to highlight the possibilities which preservation activities provide.

## 3. STATE HISTORIC PRESERVATION LEGISLATION

Current legislation does not establish historic preservation as a public policy. Several areas will need to be addressed over the next few years. These include:

- a. Clarification of the role of State Historic Preservation Officer as a state function.
- b. Establishment of a reliable, long term source of funding for an Ohio preservation program.
- c. Implementation of the State Registries programs and evaluation of the programs within the first year.
- d. State enabling legislation to facilitate 1) the creation of local landmarks and historic district commissions, 2) the donation of historic preservation easements, 3) protection of historic sites and buildings owned by the state, and 4) the establishment of a statewide revolving fund for the purchase, rehabilitation and protection of endangered archeological and historic resources.
- e. Amendment of state codes to provide flexibility in the application of health, safety, fire, and building code provisions for historic buildings.



- f. Review of a-e after each area is addressed to see if a comprehensive historic preservation bill is warranted.

#### 4. RESOURCE IDENTIFICATION

The identification, evaluation, and interpretation of the state's cultural resources, both prehistoric and historic, is basic to any preservation program. This includes:

- a. Continuation and completion of a comprehensive state preservation plan which brings together and evaluates what is known about Ohio's archeological and historic resources and which makes recommendations for the protection and retention of resources.
- b. Continuation of the state inventory to add to the data base.
- c. Dissemination of information in the survey and state plan to decision makers and interested citizens.

#### 5. ASSISTANCE WITH THE PHYSICAL CONSERVATION OF STRUCTURES AND SITES

The Ohio Historic Preservation Office has provided assistance to the public in stabilizing, rehabilitating, restoring, and protecting buildings and sites. Various approaches have been developed including research, clinics, workshops, lab work and grants. In addition to continuing these efforts, assistance could encompass the administration of a statewide revolving fund, easement programs, awarding and administering grants from public and private sources and administering loan programs. Programs would be designed to meet the needs of specific as well as general audiences. This would include:

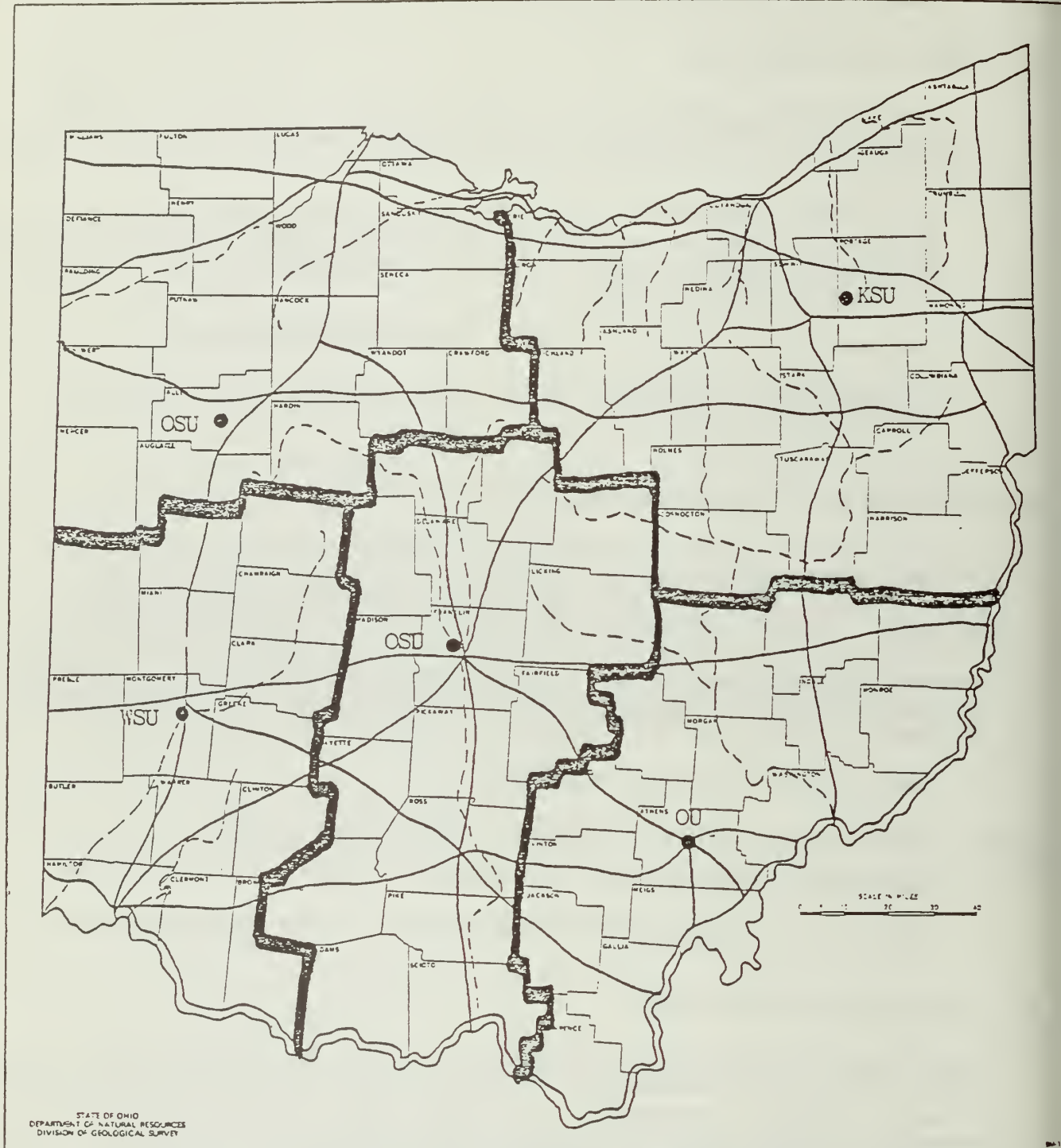
- a. Assistance in design and technology.
- b. Assistance in economics, including actual grants & loans.
- c. Assistance in law and local legislation.
- d. Assistance in archeological and agricultural land resource management.

#### 6. INTERGOVERNMENTAL RELATIONS

Traditionally the Ohio Historic Preservation Office has monitored federally funded projects and commented on the effect of such projects on known or expected cultural resources in accordance with federal law. This role will continue. However, as federal and state legislative mandates change the office anticipates the need to provide updated information and assistance to state and local agencies to help them in their compliance. This will include:

- a. Monitoring, evaluation and interpretation of federal, state, and local regulatory processes as they develop or as existing ones are amended.
- b. Assisting and coordinating with federal, state, and local agencies in addressing and carrying out agency regulations which affect or address historic preservation.





----- Rivers

———— Roads

● Potential sponsors

———— Regional boundaries





## PROGRAM OVERVIEW

Introduction

According to the National Conference of State Historic Preservation Officers, Wisconsin's preservation staff was about half that of the average of the other states early in FY 81. In spite of this, the state ranked second in the nation in HCRS's competitive evaluation of work programs for FY 81. Unfortunately, the state's SFY 81-83 biennial budget imposed an across-the-board 8 percent cut on agency budgets. As a result, the Historic Preservation Division of the State Historical Society of Wisconsin lost two of its positions in being reduced from 11½ permanent, civil-service positions, to 9½. The State Historical Society was reduced a total of 13½ positions to meet the 8 percent cut. Accordingly, the division enters FY82 with a permanent staff 17 percent smaller than it had in FY 81. The cut came on the heels of fiscal reductions in the division's budget during FY 80 that eliminated the division's own summer reconnaissance survey projects in FY 81. Thus, the division is truly handicapped today in comparison to its past capabilities, and the advent of 70/30 matching federal funds for survey and inventory in FY 82 will be especially welcome in Wisconsin.

The staff of the division required to meet federal regulations for state participation in the historic preservation program, with one exception, remains the same as a year ago: James Sewell, historical architect; Jeff Dean and Diane Filipowicz, architectural historians; William Green, archeologist; and Barbara Wyatt, historian. The exception is the new historian in the Survey and Planning Section, Leonard Garfield, who filled a position that had been vacant for over a year because of a FY 81 temporary hiring freeze. Garfield will serve as the division's primary historian for survey and registration activities.

Division staff was instrumental in helping develop major new state legislative proposals during FY 81. These proposals, developed by a Milwaukee legislator concerned about the demolition of the Elizabeth Plankinton mansion (National Register) in Milwaukee, will deal with historic buildings, with state enabling legislation for local preservation ordinances, and with the liability of owners of historic buildings who allow the public to tour them. They should be introduced into the state legislature in the first weeks of FY 82. A more modest legislative initiative dealing with the designation of the State Historic Preservation Officer for Wisconsin also should be introduced in FY 82.

The Local Preservation Coordinator position, created in FY 80, proved to be invaluable in FY 81 in educating the public and community groups about historic preservation (public education is not logically incorporated in one of the three work elements that follow). The Wisconsin Preservation newsletter mailing list was expanded from 2,500 to 2,700, with the addition of women's and minority groups as well as others. Thirty-eight group presentations in 17 Wisconsin counties were made by the Local Preservation Coordinator, who also published six new newsletters, and sent out 21 news releases. Moreover, division informational materials have been substantially reworked, largely at this individual's suggestion and direction.



The program overview required for the FY 82 work programs follows:

### Survey Element

1. Major accomplishments in FY 81. Several community-based, intensive surveys were completed in FY 81, including those covering all of the cities of Beloit, Kenosha, Neenah, Oshkosh, and five communities in Trempealeau County. Also, intensive surveys were begun in Janesville, Waukesha, Eau Claire, and Sturgeon Bay. In short, a record number of Wisconsin communities were undergoing intensive surveys in one phase or another during FY 81. Intensive surveys were also conducted of all of Green County (our first county intensively surveyed completely) and industrial sites in the Fox River valley (northeastern Wisconsin, phase two). A publication about the Milwaukee reconnaissance survey, completed in FY 80, was prepared in FY 81 and will be available early in FY 82. It will probably be the most significant survey publication to come out of Wisconsin to date.

Archeological surveys during FY 81 focused on several poorly known and rapidly developing localities, and on producing a CRP predictive model. Intensive or reconnaissance surveys were conducted in Milwaukee, Jefferson, La Crosse, and Burnett counties; in the Prairie du Chien and Chippewa Falls areas; the east shore of Lake Winnebago, and large portions of the Fox River valley in southeastern Wisconsin. Several extremely significant sites were found, and in some cases selective test excavations were made and negotiations with land owners reduced or averted various forms of planned or natural impacts on these sites.

2. Problems and needs in FY 81-82. Regarding survey activity, the major problems observed in FY 81 are noted below:
  - a. Survey consultant problems. Nearly all surveys have come in over budget and been completed late. Generally, however, the division did not increase grant amounts because of budget overruns, and the added costs were absorbed by the subgrantees. These problems arose in spite of the division's use of extremely tight, scheduled contracts implemented before FY 81. Consultants have, therefore, underestimated the amount of work necessary to complete clearly defined work programs.
  - b. Use of volunteers. Without exception, plans by subgrantees to use volunteers as part of their matching share for survey projects did not work as anticipated. Volunteers did not come through as they had promised or at all, or the work they undertook was not of professional quality. Subgrantees obviously over-estimated the capability and commitment of volunteers they had selected, or had not trained and supervised them correctly.
  - c. Reconnaissance survey of state remains incomplete. Due to fiscal policy adjustments by the Society in FY 80 and earlier, the division no longer had the excess local match in FY 81 to conduct its own summer reconnaissance surveys. Accordingly, division-directed survey projects were discontinued after FY 80, and the area of the

state covered by historical-architectural reconnaissance surveys from 1973 through 1980 did not increase appreciably. Approximately one-third of the land area of Wisconsin remains unsurveyed in this way, although this area is the least-developed and -settled part of the state. The original survey plan prepared in 1973 called for completion of the statewide reconnaissance survey in 1983--this does not appear now to be likely.

- d. A comprehensive survey strategy does not exist. Given the termination of the division's own reconnaissance surveys and the reliance of remaining survey projects on local initiatives and matching funds, a new statewide survey plan has not been prepared:
- e. Historic Preservation Division staff could not survey. According to a survey of the states by the National Conference of State Historic Preservation Officers, Wisconsin's state preservation staff is less than half the average size of other state staffs. It is understandable, therefore, that the SHPO's staff was not able to conduct surveys itself during FY 81 or previous years, with only a few, minor exceptions.
- f. The statewide inventory is manual. The statewide inventory of historic places remains in manual form, organized by geographical place. Searches of the inventory by categories other than geographical location are all-but-impossible. This renders nearly impossible comparisons of resources from survey to survey to aid in evaluations, and also makes comparisons impossible for nomination purposes, except within very limited areas.

3. Addressing needs in FY 82. The problems and needs noted above will be addressed, respectively, as indicated below:

- a. Survey consultant problems. Based on the SHPO staff's experience, more realistic work programs will be designed for future projects. The staff will emphasize continually that schedules in contracts mean exactly what they say—a surprising phenomenon, according to many contractors. SHPO's staff will visit each project more frequently, one monitoring visit at least every two months for every project, in order to determine whether projects are on schedule or if contracts should be amended. Finally, SHPO staff will review its survey contract and project manual, and update and revise them as necessary. (FY81 - Sup. Act. "A"; FY82 - Sup. Act. #9)
- b. Use of volunteers. Matching proposals with significant volunteer components will be scrutinized more closely, and the use of volunteers in a significant way will be discouraged or prohibited on a case-by-case basis. Volunteers will be limited to nonprofessional tasks that are not crucial to the completion of a project. Subgrantees who do not provide most or all matching share with cash or professional services will receive significantly less priority. (FY82 - Sup. Act. #10)

- c. Reconnaissance survey of state remains incomplete. Limited state-defined reconnaissance surveys will be resumed when and if 70/30 survey and inventory funding is available in FY 82. Without the advent of 70/30 funding, the reconnaissance statewide survey will be suspended indefinitely. In addition, intensive surveys of areas experiencing severe compliance problems or development pressure may also be undertaken by SHPO staff on a limited basis utilizing 70/30 funding. (FY82 - Sup. Act. #3)
- d. A comprehensive survey strategy does not exist. An integrated survey, registration, and protection plan will arise in FY 82 and FY 83 through the division's planned CRP process. Preliminary survey strategy priorities, for interim use, are being developed by the Survey and Planning Section of the division. (FY82 - Sup. Act. #2, #5, & #8; FY81 - Sup. Act. "B")
- e. Historic Preservation Division staff could not survey. Two developments will enable division staff directly to conduct surveys in FY 82: first, the arrival of 70/30 funds will provide additional assistance to this end; and second, the new nominations processing system will free up SHPO staff time for survey purposes. The state will also continue to utilize its very successful S & P subgrant program to carry out archeological surveys or intensive surveys of communities in the state and will give technical assistance to local groups who wish to carry out survey activities themselves. (FY81 - Sup. Act. "C" & "D"; FY82 - Sup. Act. #1, #3, #4, #6, #11 & #12)
- f. The statewide survey is manual. Included in this work program is a consultant-services budget to retain an independent data-processing consultant to analyze the Historic Preservation Division's data needs for registration, survey, protection, grants, and public education purposes. (The rest of the State Historical Society is also pondering the benefits and realities of computerization, and the division hopes to join in a cooperative project to identify and implement a suitable Society-wide system). Computerizing the inventory is one of the division's single highest priorities for FY 82-83. (FY82 - Sup. Act. #7)

#### Registration Element

- 1. Major accomplishments in FY 81. At the end of FY 80, there were 550 entries in the National Register of Historic Places from Wisconsin—each property in a thematic group being counted separately, and a historic district being counted as a single entry. By the end of FY 81, there were 610 entries in the National Register, an increase of 60, or of 11 percent. However, two National Register properties in the state were lost during the year, one to fire and the other to demolition, leaving a net of 608 entries. During the year, 52 nominations were submitted to the Department of the Interior (DOI), however, 12 were returned due to the freeze on private-property nominations required by the passage of the National Historic Preservation



Amendments of 1980. In previous years, annual National Register entries from the state exceeded 100. The reasons for the drop to 60 during FY 81 were the DOI-imposed freeze on nominations coupled with a vacancy in the Historic Preservation Division's historian position, which lasted for 11 months of the fiscal year, as well as the last four months of the previous fiscal year. Given these obstacles, the entry of 60 properties during FY 81 is a major accomplishment.

Of course, the major thrust of the nomination process during calendar 1981, because of the freeze on private-property nominations, was in submitting nomination for government-owned historic properties. Over 30 such nominations were approved by the review board in 1981, including eight substantial archeological nominations. A thematic group nomination for 23 county courthouses was completed at the end of FY 81, essentially wrapping up the nomination of eligible courthouses. The state's backlog of public-property nominations was eliminated.

2. Problems and needs in FY 81-82. Regarding registration activity, the major problems observed in FY 81 are noted below:
  - a. Backlog. During the nominations freeze, a substantial backlog has built up of completed National Register nomination forms awaiting review board action. At this time, 67 such forms are in holding files, including 55 individual, 4 district, 5 thematic, and 3 multiple-resource nominations.
  - b. Understaffing. The division had inadequate numbers of staffers to prepare nomination forms at the rate they are requested. Thus, a backlog of requested, uncompleted nominations has built up. There is no prospect for adding staff to take hold of the backlog of requests and eliminate it in accordance with past nominations operating procedures.
  - c. Quality of submitted nominations. The division has never had problems with the quality of nominations prepared by its own staff. However, with increasing numbers of nominations prepared by outsiders and consultants being submitted, the quality of submissions has become a concern. It is rare that an outside nomination equals the completeness and quality of an in-house nomination.
  - d. Nomination priorities. In the past, nominations have largely been prepared and submitted on a "first-come-first-served" basis. Requests were logged in, dated, and accommodated in approximately that order, with emergency situations taking precedence. The division has only rarely initiated nominations on its own according to a rational plan for preservation. Therefore, the National Register entries from Wisconsin, taken as a whole, are not representative of the state's history, geography, prehistory, architecture, engineering, or preservation needs. The majority of the state's entries, collectively, represent a record of requests by property owners.



- e. District obstacles. The proposed nomination of a historic district in a community, especially if it incorporates a CBD, breeds active resistance by municipal officials and businessmen, as evidenced by the attempted College Avenue Historic District, Appleton. This district resistance will gain greater strength by the new owner-approval regulations once the freeze is lifted.
  - f. Historian & registrar position laid off. Due to 8 percent across-the-board state budget cuts, the State Historical Society laid off the Historian & Registrar position in the Historic Preservation Division as of 30 December 1981—one of 13½ positions laid off by the Society. This means the administrative duties relating to National Register nominations and listings, and some historical nomination research and writing—duties of this position—will have to be ended or absorbed by other staff.
  - g. Public information. For the past few years it has been apparent that the general public does not understand what listing in the National Register really means. The compliance issues and more recently the tax implications have further clouded the issues in the public mind. A public information officer added to the Historic Preservation Division in FY 80 has alleviated some of the problems and great strides have been made in informing citizens about the implications of National Register listing. However, that job is not and may never be "complete." The most significant public information problem identified during the past year concerns the ballooning tax certifications. Projects are often submitted after work has been done and in nearly all cases are not certifiable. Further, Division staff were not even aware of the projects until these submissions were received, so the opportunity to salvage them does not exist. Project certification forms are submitted with very little detail and description, despite the federal instructions and forms. Often the public expects SHPO staff to complete these forms for them. With staff reductions and limitations, this is definitely not possible. Clearly, substantial public information efforts must be directed toward these applicants in FY 82.
3. Addressing needs in FY 82. The problems and needs noted above will be addressed, respectively, as indicated below:
- a. Backlog. To handle the backlog of completed nominations, the state review board has already agreed to meet bimonthly, rather than quarterly, once the freeze is lifted. Moreover, if necessary, the board will meet over a two-day period, rather than one day.
  - b. Understaffing. To handle the increasing workload in nominations with a steady or reduced staff level, the state's nominations processing system has been completely revised to place responsibility for completing nominations on the shoulders of the sponsors of requested nominations, rather than on SHPO's staff. At

the same time, the division prepared a new supplementary nominations manual to complement the National Park Service's booklet, "How to Complete National Register Forms", has published a list of consultants willing to prepare Wisconsin National Register nominations, and has prepared instructions on the new system as well as a sample contract between a nomination sponsor and a private nomination preparer. (FY 81 - Sup. Act. "E"; FY 82 - Sup. Act. #13)

- c. Quality of completed nominations. The supplementary nomination manual, referred to under "b" above, has been sent to all qualified nominations preparers willing to prepare Wisconsin nominations. It is also sent to parties attempting to complete their own nominations. Included therein is an example of a properly completed National Register form in accordance with federal and state standards. During FY 82 a review system will be implemented that will return inadequate nominations to their sponsors or preparers with SHPO-staff comments on necessary revisions. (FY 81 - Sup. Act. "E"; FY 82 - Sup. Act. #13)
- d. Nomination priorities. The absence of a rational system for prioritizing Wisconsin nominations to the National Register will be addressed in FY 82 by two developments: (1) the division will be entering a cultural resource planning (CRP) process that will incorporate nomination priority setting; and (2) the new procedures for handling requested nominations will free the time of SHPO survey and nominations staff to prepare state-initiated nominations for, in effect, the first time. These developments will allow the SHPO staff to work on nominations in accordance with the state's new nomination policy and with priorities determined under the CRP process. (FY 81 - Sup. Act. "F", "G", "H1", "H2", "I", & "Q"; FY 82 - Sup. Act. #14, #15, #16 & #25)
- e. District obstacles. Given the ingredients of the 1980 amendments, it will be especially difficult to nominate to the National Register historic districts in small or conservative communities in the future. This problem will be addressed primarily through public education programs commencing at the earliest stages of working on a district nomination, by holding meetings as necessary with key local officials and businessmen, & by funding with S & P subgrants, district nomination projects sponsored by local governments. These programs will explain the benefits of National Register listing, and the lack of obstacles it causes. Moreover, public education meetings will be incorporated into all survey contracts in urban areas in FY 82, to assure that the residents of a community understand the goals of local surveys and the meaning of National Register listings. (FY 81 - Sup. Act. "R"; FY 82 - Sup. Act. #16a & #19)
- f. Historian & registrar position laid off. Mandatory functions carried out by this position will be shifted to other staff members in the division. The decrease in historical research and writing capability of the division will be addressed as noted in (b) above.

- g. Public information. The Historic Preservation Division intends to continue those efforts utilized in past years which have been successful in clarifying the National Register program functions in Wisconsin. The Division Newsletter, Wisconsin Preservation, will continue to be published on a bi-monthly basis, bringing constituents up to date on developments in the National Register program and related issues. The Division also will continue to advise property owners, local units of government, nomination sponsors, and other interested parties of the dates and times of state Review Board meetings. Detailed assistance will be provided to project sponsors involved in compliance cases. Significant effort will be put into public information activities directed to potential tax act participants. Staff will revise a packet of information describing the benefits and certification procedure to be mailed to all interested parties. At least one article will be published in the Division Newsletter describing these procedures during FY 82. The Division architect will meet with and advise as many potential applicants as possible regarding proper (certifiable) work activities prior to the initiation of project work. Applicants will be strongly encouraged to hire professional architects to plan project work and professional consultants to prepare Part I certification forms and subsequent National Register nominations. Lists of interested consultants and architects will be distributed along with the general tax act information packets. A new staff routing procedure will be implemented to assure timely review and comment of all projects received. (FY 81 - Sup. Act. "J", "K", "L", "M", "N", "O", & "P"; FY 82 - Sup. Act. #17, #18, #20, #21, #22, #23, & #24)

#### Protection Element

1. Major accomplishments in FY 81. Memoranda of agreement between the SHPO, the Advisory Council on Historic Preservation, and appropriate federal and local agencies were negotiated during FY 81 for numerous major projects. Included among these were the Jones Island Wastewater Treatment Plant (EPA), Milwaukee; the Secor Buildings (HUD/CDBG), Racine; and the Round Lake Logging Dam (USFS), Forest County. The Wisconsin Department of Natural Resources, during FY 81, added an HPF-grant assisted archeologist to its staff to conduct archeological surveys for federally-assisted projects and parks planning. The Wisconsin Department of Transportation commenced in FY 81 a statewide comprehensive truss-bridge survey of the approximately 1,500 such bridges on public roadways to aid its bridge-replacement program. While Wisconsin DOT has not yet agreed to following up the completed bridge survey with a planning process, it has at least agreed to consider the possibilities. The SHPO staff plans to continue to urge the commencement of a bridge preservation program as the logical outgrowth of the survey. The U.S. Forest Service commenced a study of logging-period resources in Nicolet National Forest in order to develop specific criteria for evaluating their significance. Finally, the Compliance Section of the Historic Preservation Division reviewed over 1,500 A-95 notices, EIS's, 106 assessment cases, COE permits, and other documents regarding the



impact their respective projects would have on historic and archeological properties.

To maximize public participation in the grants-in-aid selection process, the public was invited to comment on the criteria and procedures for project funding in the Division newsletter, Wisconsin Preservation. The newsletter has a distribution of more than 2,700 persons and groups, including all minority and womens organizations identified by the Wisconsin Office on Equal Opportunity. In addition, grants staff simplified the administrative procedures for A & D subgrantees by producing new subgrant manuals and making available standard project signs to at no charge to subgrantees.

2. Problems and needs in FY 81-82. Regarding protection activity, the major problems observed in FY 81 are noted below:

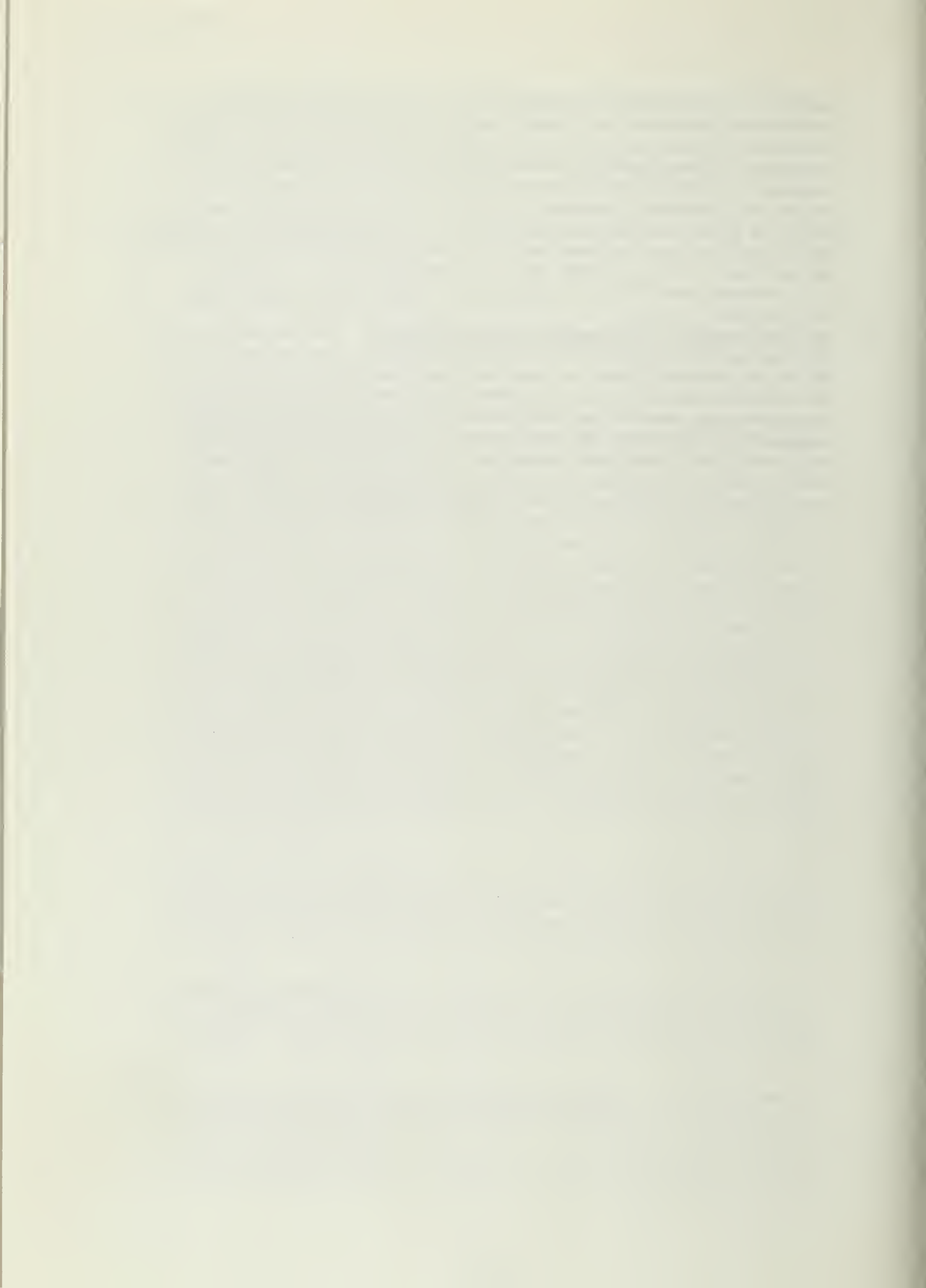
- a. Determining the eligibility of resources. Protection staff reports that this was the single major problem, and consumed the most amount of staff time. Local governments have a very hard time going through the determination of eligibility process. They do not have qualified staff to handle it, and the respective federal granting agencies are of no assistance to them (i.e., HUD, EPA, etc.). Staff members spent countless hours on the telephone trying to explain the entire process, and reason for it, to people not trained in dealing with historic, archeological, or architectural resources.
- b. Federal agency inaction. As repeatedly noted in the past, federal granting agencies take little or no initiative or lead in supplying their grantees with information or instructions on complying with Section 106. As a result, communities don't know what their responsibilities are. SHPO staff efforts to step in have had limited success, primarily because communities do not respond as positively to an agent other than the one issuing the funds: e.g., if HUD doesn't specify the Section 106 requirement must be met to receive HUD funds, communities are reluctant, even occasionally unwilling, to do it. Policies, if adopted in Washington, do not necessarily filter down to area offices.
- c. Advisory Council delays. We have experienced unnecessarily long delays in obtaining memoranda of agreement from the Advisory Council on Historic Preservation.
- d. Inventory searches. Searches of the inventory of historic places to determine which properties might be affected by specific projects have proven to be extremely time-consuming due to the manual condition of the state inventory.
- e. A & D Component Funding. In FY 81, for reasons beyond our control, Wisconsin apparently lost its entire A & D component to the rescission of FY 80 and FY 81 funds and the NPS suspension of reprogramming of FY 79 funds. As a result, we were not able to meet, through the A & D component, any portion of the demonstrated need of owners of National Register properties in Wisconsin for financial assistance for development work.



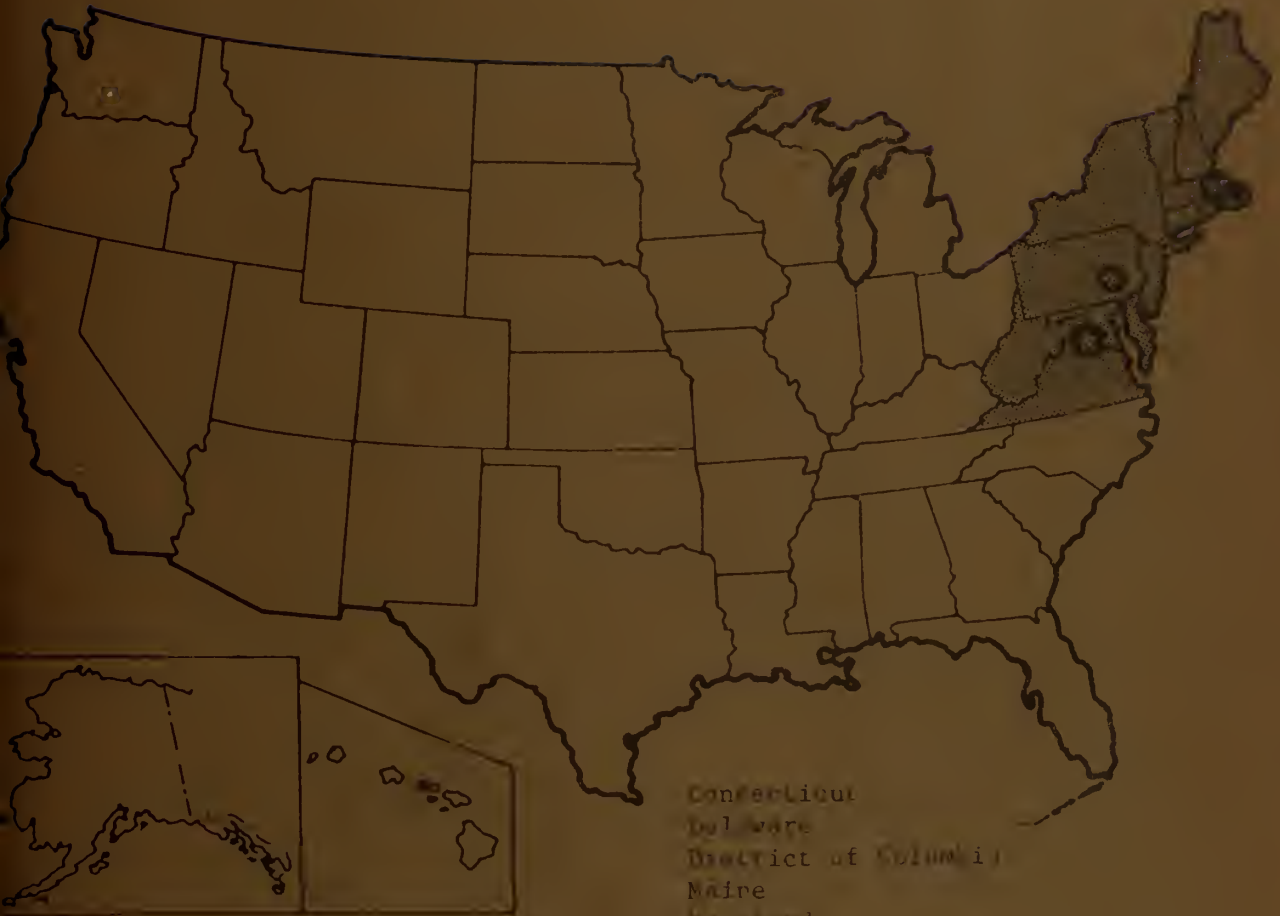
- f. A & D grants management. The apparent rescission has created an impossible grants management situation. We have been unable to advise the proposed recipients of matching grants of the status of their projects, nor have we received any indication from NPS of the likelihood that these projects will eventually be funded.
3. Addressing needs in FY 82. The problems and needs noted above will be addressed, respectively, as indicated below:
    - a. Determining eligibility of resources. The SHPO's protection staff is currently redesigning intraoffice review procedures for compliance cases. The resulting procedures will be more realistic with respect to marginally significant properties and properties about which no historical data is available. More of the burden of having pre-identified historic and prehistoric properties will be shifted to the SHPO's statewide inventory. As a result, there will be fewer determinations of eligibility sought for marginal properties. (FY 81 - Sup. Act. "2")
    - b. Federal agency inaction. During FY 81, the SHPO staff held a training session for HUD staff in the state, which will have positive effects in FY 82. Intensive surveys of large or problematical cities have been initiated or completed, giving the SHPO staff advance knowledge of local resources. Communities with the most difficult compliance records have been or are being surveyed. Prodding federal agencies into taking the lead in implementing Section 106 requirements, however, has been and remains the primary responsibility of the Advisory Council on Historic Preservation. Area offices of federal agencies simply do not respond well to an SHPO's initiatives; direction must come from national offices in Washington. Nevertheless, SHPO staff will continue to schedule meetings, offer technical assistance and evaluations of inventory data to project sponsors and "critical agencies" in an attempt to circumvent these uncooperative federal agencies. (FY 81 - Sup. Act. "S", "T", & "U"; FY 82 - Sup. Act. #26)
    - c. Advisory Council delays. There is nothing the SHPO staff can do about the delays beyond simply advising council staff of the problems they create. However, it is possible that the new Section 106 regulations, now in preparation, may solve this problem.
    - d. Inventory searches. This will be facilitated considerably by the computerization of the inventory and installation of CRT work stations at several locations in the Historic Preservation Division. (Discussed under survey element; FY 82 - Sup. Act. #7)
    - e. Acquisition and development component funding. It now appears that there may be no federal funds available for acquisition and development projects in FY 82. If there are, or if any FY 79, FY 80, or FY 81 funds are restored to Wisconsin for acquisition and development, staff will work to complete previously selected

projects at the earliest possible time and to fund additional projects if possible. To meet the need for financial assistance to owners of historic properties, SHPO staff will attempt to fund necessary predevelopment work through the FY 82 S & P subgrant program. Staff will also stress the historic preservation tax incentives whenever possible. Staff has begun, and will complete early in FY 82, simplified instructions and procedures for owners of historic properties wishing to take advantage of the tax incentives. The incentives will be promoted in the newsletter. (FY 81 - Sup. Act. "L", "M", "N", "V", & "W"; FY 82, #27 & #28)

- f. Acquisition and development grants management. It is likely that the impossible management situation created by the uncertainty of FY 79, 80, and 81 funds will be resolved sometime in FY 82. Once we learn of the status of rescinded funds and the suspension of reprogramming, we will properly advise ongoing and potential subgrantees and initiate the new projects (if funding is restored). SHPO staff will continue to monitor and provide technical assistance whenever necessary to ongoing A & D projects. (FY 81 - Sup. Act. "X" & "Y"; FY 82 - Sup. Act. #29, #30, #31, #32, #33, & #34)



# Mid Atlantic North Atlantic and National Capitol Regions

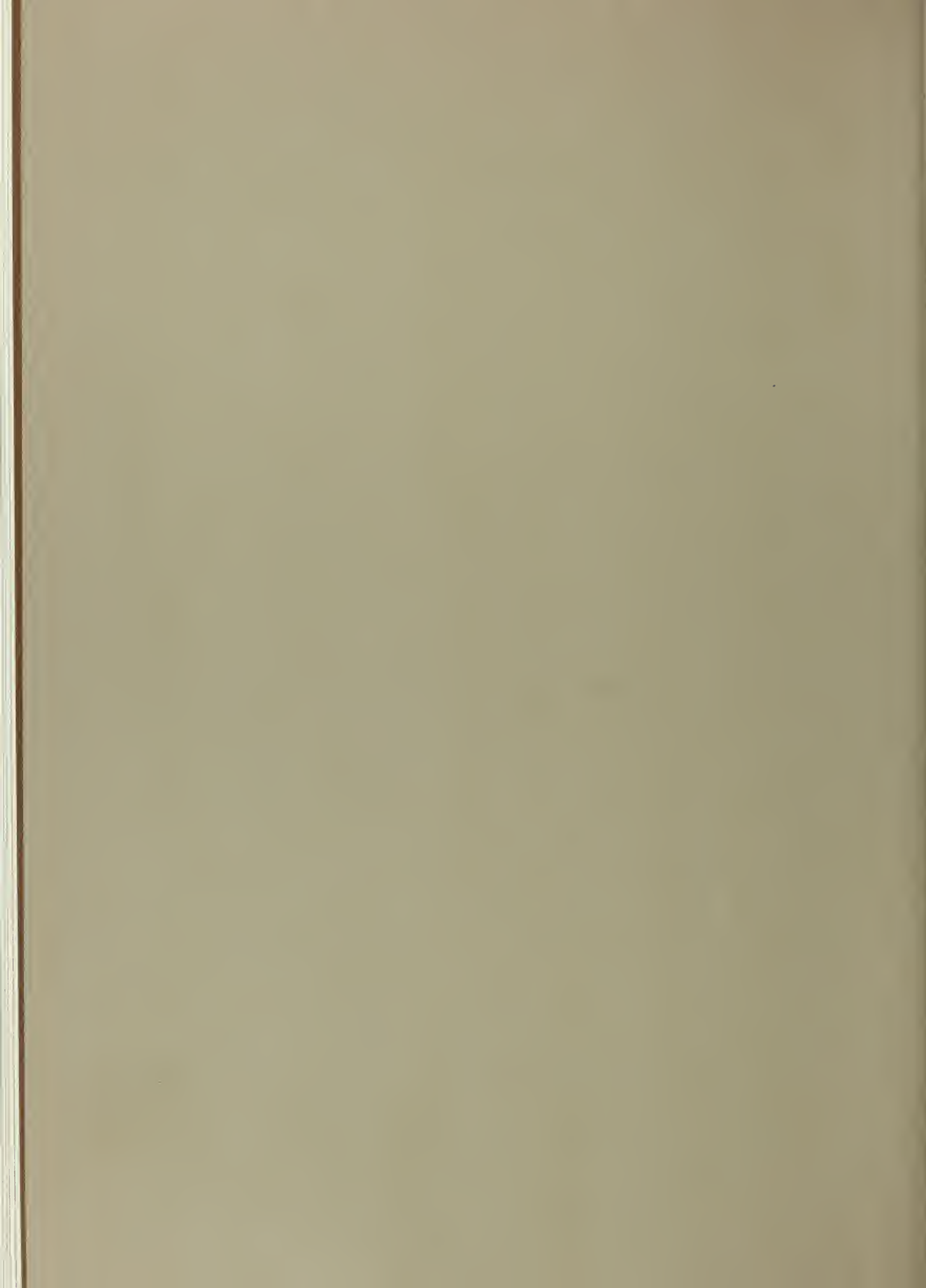


Connecticut  
Delaware  
District of Columbia  
Maine  
Maryland  
Massachusetts  
New Hampshire  
New Jersey  
New York  
Pennsylvania  
Rhode Island  
Vermont  
Virginia  
West Virginia









FISCAL YEAR 1981

Fiscal year 1981 saw a continued increase in the provision of the basic services offered by the Connecticut State Historic Preservation Office. The year was also characterized by improved management in the delivery of these services and by a continued emphasis on providing access by the public to the program components of survey, registration and protection. Exciting new efforts and accomplishments were in the key roles played by State Historic Preservation Office staff in the Governor's Heritage Task Force and in a conference and publication of a source book on the adaptive reuse of structures for housing, the drafting of new legislation to protect Connecticut's cultural resources, and the publication of a major inventory of Connecticut's historic industrial and engineering sites, and posters showcasing the results of three local surveys.

The advances which historic preservation makes each year are one of the fruits of continued cooperation with, and development of, the capabilities and programs of private, non-profit organizations. this cooperation takes place in diverse ways, among them the provision of grant-in-aid assistance to technical assistance programs, such as at the Connecticut Trust for Historic Preservation and the Hartford Architecture Conservancy. The Connecticut Trust program supports organizational development in preservation organizations across the state. The Hartford Architecture Conservancy's activities are focused on one urban area, and include a full range of programs, including design assistance for a commercial street in a National Register District which has many minority-owned businesses.

Staff also provides assistance directly to organizations on occasion. An example is the technical support given to the formation of the Connecticut Association of Historic Theaters in Fiscal Year 1981. A more complex type of cooperation is evident in the co-sponsorship of a conference on adaptive reuse for housing. The Tri-State Regional Planning Commission was lead agency; co-sponsors were the Connecticut Trust for Historic Preservation, the Connecticut Department of Housing and the Connecticut Historical Commission. Staff of the State Historic Preservation Office screened contractors to prepare prototype reuse plans, reviewed in detail drafts of the conference handbook, mailed conference information to potential attendees and made presentations at the conference, which was held on June 25, 1981.

The Governor's Heritage Task Force has had the benefit of extensive professional and administrative assistance from staff of the State Historic Preservation Office. This Task Force is developing executive and legislative proposals and policies for the preservation of Connecticut's natural, cultural, and artistic resources.

These activities are important to the overall advancement of the agency's goals, and are evidence of the commitment to developing and supporting competence at the most appropriate levels. The next several sections detail specific accomplishments and problems for the program elements of survey, registration and protection.



## Survey

Surveys have generally been accomplished through sub-grants to non-profit organizations and municipalities. This process leads to some loss of quality because of less direct control and supervision. This problem has largely been overcome in recent years by closer supervision and direction from the Survey Director to sub-grantees. As a result, the surveys completed in Fiscal Year 1981, Middlefield and Windsor, and those to be completed in the first month of Fiscal Year 1982, New Haven, East Hartford and Stonington, are measurably superior to survey projects from earlier years. Also as a result of improved design and contract management, survey projects can more easily be translated into National Register of Historic Places nominations. The full realization of the benefits of this integration awaits the appointment of a new survey director, which is anticipated by January 1, 1982.

The completion of a two year National Architectural and Engineering Record inventory project is a further example of the integration of program elements. The research was completed in time for the annual conference of the Society for Industrial Archaeology, provided the content of the tours, and was published as Connecticut: An Inventory of Historic Engineering and Industrial Sites. Staff acted as tour guides and have reviewed National Register of Historic Places proposals springing directly from the inventory data. The report has been widely distributed to planners, public officials and libraries throughout the state. The volume has also been in demand from private developers, such as utilities.

Among the problems remaining unsolved are the discovery of means to manage the large volume of survey data and a format for disseminating survey results. The development of a poster format and publication of three posters following this format proved to be very successful in increasing the visibility of the program and developing public interest. Still, the poster publishing activity was very demanding of staff time, and this activity will probably not be resumed during Fiscal Year 1982.

## Registration

The primary difficulties in the registration element were external to the program. The State Historic Preservation Board (Review Board) met on December 4, 1980 for the first time in a year and a half; no sooner had the problem in the state law creating the State Historic Preservation Board been remedied than the Historic Preservation amendments of 1980 became law. Because the opportunity for owner objection to National Register listing requires Federal regulations, the National Register of Historic Places has not accepted nominations for privately-owned property since December, 1980. The nomination process proceeded with three additional Review Board meetings at which publicly and privately-owned individual sites were considered. Since the December 4, 1980 meeting, no districts have been presented to the Review Board because of the uncertainty of the owner notification process.

87 nominations have been approved by the State Historic Preservation Board and are awaiting the issuance of National Register regulations so that they may be nominated to the National Register by the State Historic Preservation Office. 40 nominations have been written, but not yet presented to the State Historic Preservation Board.

Priority in National Register nomination is still given to sites owned by or significant to minority or handicapped persons or groups. Properties which are the subjects of Tax Act applications are processed on a priority basis as are sites which have been determined to be eligible for the National Register by the Secretary of the Interior.

Nominations come primarily from consultants under contract to the Connecticut Historical Commission on a piece-work basis and from professional consultants engaged by developers or building owners. A small number come from non-profit preservation organizations. While this process is not as closely controlled as would be a system with staff-prepared nominations, there has been no problem with quality control. The best evidence for this is in the low return rate for National Register nominations and positive review given by the National Register Washington staff. The system employed in Connecticut does provide maximum public access to the National Register of Historic Places program at the only source of contact available, the State Historic Preservation Office.

### Protection

The protection element comprised a continuation of existing programs for the most part. New initiatives were mounted in the legislative area.

New language in the Connecticut Environmental Policy Act requires that state activities be planned taking historical, architectural and archaeological resources into account. Another measure exempts the exact location of archaeological sites from disclosure under the Connecticut Freedom of Information Act. Finally, a measure that would have removed solar energy devices from the purview of historic districts commissions was modified to call special attention to energy conservation and requiring a special burden of proof from historic district commissions denying applications for solar equipment.

Design services for historic areas are an important component of Connecticut's protection plan. The role of non-profit organizations in providing such services, particularly in minority areas, has been proven successful in Hartford, with the help of a Survey and Planning sub-grant. Design review and advice in connection with compliance responsibility has also been supported, most notably in Stamford.

The compliance staff has placed emphasis on developing and monitoring the capability of Community Development communities to operate rehabilitation programs in accordance with the Secretary of the Interior's standards. This process involves the integration of survey, registration and protection components.

Reviews of Federally funded or licensed projects continues to require the major portion of the work week of two of the seven professional staff positions in the State Historic Preservation Office.

This commitment is the direct result of firm insistence that the provisions of Section 106 be complied with and that all projects with potential for impact be reviewed by the State Historic Preservation Office. That these compliance cases are settled by consensus is a credit both to the staff of the Connecticut Historical Commission and to the long-term development of a posture which encourages agencies to consult with the State Historic Preservation Office at the earliest possible time in project planning.

One innovative and successful protection strategy has been a grant to a non-profit professional archaeological research group to allow that group to salvage important sites threatened by private development. Three complexes of very significant sites were salvaged in Fiscal Year 1981 by this means.

9 Connecticut continues to have one of the most active Tax Act programs in the country, and activity in 1981 did not slacken with \$40 million worth of rehabilitation projects reviewed last year. Tax Act projects are processed as priority items.

In the management and administration of the State Historic Preservation Office, Fiscal Year 1981 was a year in which several items illustrated the efficiency of improvements installed in the past several years. In particular, the resolution of audit reports covering expenses extending back to the early 1970's established the soundness of Connecticut's grants accounting and management system. In particular, the audit covering grants for the 12 month period ending June 30, 1980, identified no significant problems in grants-in-aid accounting and management.

A process of grants-in-aid project selection by the application of formal criteria has proven to be a great improvement in grantee selection. The process is submitted to the Connecticut Historical Commission, a public body appointed by the Governor and representing many constituencies, for approval prior to its employment in selecting grant applications for funding.

37 Fiscal Year 1981 saw the continuation of well-established programs,  
50 and some new initiatives. Some of these new projects, a film and the survey posters, for example, were experiments to meet the Connecticut State Historic Preservation Office's most serious need, the lack of a public information capability. Other creative efforts to meet the public information need included the writing of short news and information pieces for existing publications, the funding of a statewide newsletter on historic preservation, and the issuance of certificates and sale of 122 plaques to National Register of Historic Places owners.

Generally, the year can be characterized by the tremendous volume of service requests answered. In this, Fiscal Year 1981 was a continuation of the trend of recent years towards increased knowledge of the programs of the State Historic Preservation Office on the part of public and private organizations and individuals and a consequent increase in the demands on staff to serve the needs of these groups and persons. Fiscal Year 1982 promises to be little different; only the level of resources available to meet these needs is in question.



FISCAL YEAR 1982

Emphasis in Fiscal Year 1982 will be placed on the provision of basic services which are available only from the State Historic Preservation Office. Existing programs will be managed effectively to accommodate expected increases in some types of activities. Activities will be similar to those of Fiscal Year 1981.

The goals and needs of historic preservation at the level of the State Historic Preservation Office require the administration of a program of basic services in all areas of the state, and available to a full range of citizens. These priorities are expressed first, in the assignment of staff to provide basic administrative and support activities for decision making by the State Historic Preservation Officer and second, by placing a premium on grant activities that: survey areas not previously surveyed; benefit large numbers of people; are coordinated with 106 activities or use Community Development Grant funding; have public education components; help preserve endangered resources; benefit minority or handicapped persons; or which are new solutions to preservation problems.

A primary consideration in the making of a substantial number of sub-grants has been that support and an effective means should be available at the appropriate level, most often in a locality, for the delivery of historic preservation services. Thus, private groups have been supported rather than building a large staff in the State Historic Preservation Office. The efforts of the modest State Historic Preservation Office staff are directed toward providing governmental reviews, official certifications and determinations and in supporting and advising front-line agencies and organizations in the public and private sectors. Utilization of such a strategy permits the State Historic Preservation Office to achieve goals beyond what the limited staff can itself carry out. The funding through a grant-in-aid of a statewide historic preservation newsletter is an example of the successful implementation of this strategy.

### Survey

The Process of making sub-grants to carry out surveys will continue. Survey projects will be undertaken in Haddam, Plainville, Torrington and Willimantic. Three of these four are small urban areas. Archaeological survey work will continue in North Canaan and Canaan. Finally, a thematic study of Connecticut's theaters will be commenced. Several surveys begun in Fiscal Year 1981 will be completed in Fiscal Year 1982; 2 of these are in urban areas. The quality of the survey is expected to meet the standards of those in the recent past; National Register recommendations are one component of the final product.

A session at an annual meeting of a national organization will concentrate the problems and possibilities of conducting surveys using Connecticut as a model will be planned and executed during Fiscal Year 1982.

One program utilizing Federal funding on a continuing basis, the Willimantic rehabilitation program, will be funded for survey activity in Fiscal Year 1982. Communities which are likely to have similar loan and grant programs will be identified and encouraged to plan survey projects.



Projects to be completed in Fiscal Year 1983, but which will be funded and begun in Fiscal Year 1982 are

Archaeological surveys of	Square Miles
Canaan	15.0
North Canaan	10.0
Lyme	15.0
Historical and architectural surveys of	
Historic theaters statewide	
Haddam	46.7
Plainville	9.9
Torrington	2.0
Willimantic	2.0

Some decrease in the level of activity from Fiscal Year 1981 is expected since a new survey director, to be hired by January 1, 1982, will be learning the operating procedures of the Connecticut State Historic Preservation Office. It is anticipated that new personnel will open possibilities for re-shaping programs to meet unanswered needs. Plans for dissemination of survey data, methods for accomplishing surveys in areas not yet studies will be devised or commenced in Fiscal Year 1982.

1 A survey of State-owned properties will be commenced in Fiscal Year 1982 and completed in Fiscal Year 1983.

### Registration

The success of the registration component depends upon the ability of the National Park Service to promulgate regulations bringing into effect the provisions of the Historic Preservation amendments of 1980. Owner notification and opportunity to object to National Register listing may mean that the processing of district nominations will present serious administrative problems.

3 Staff will process National Register recommendations arising from completed survey projects. Among these is the recently completed National Architectural Engineering Record Inventory. Since these nominations are not in response to citizen requests, there is a greater likelihood of some resistance to National Register listing. Therefore, this approach is being utilized on an experimental basis.

The 1980 amendments, and the delay caused by the present inability to nominate districts means that property lists for district nominations are becoming less accurate. The updating of the lists of property owners is likely to be an onerous administrative task, and one which becomes more burdensome with the passage of time. Because the 1980 amendments make it clear that the State Historic Preservation Office may take a position in opposition to that of the Review Board, procedures must be devised for presenting a formal State Historic Preservation Office position to the Review Board, and for developing a written Review Board opinion to accompany a nomination where opinion differs.

## Protection

In Fiscal Year 1982, this program element is expected to be characterized by high volume. Technical assistance will be provided to a wide range of constituents, including municipalities, state and federal agencies, non-profit organizations and individuals.

Closer cooperation with other state agencies will be fostered. Staff of the State Historic Preservation Office expects to work with the Departments of Housing and Administrative Services (Bureau of Public Works) to identify common concerns and to avoid or mitigate adverse effects of their projects on historical, architectural or archaeological resources and to assist in planning projects which will reuse important historic properties. Staff will also work with the State Building Code Standards Committee to enact and administer proposed Article 22 of the State's building code, which provides a means of relief for historic structures from technical deficiencies under the code.

Grant-in-aid support for archaeological assistance to regional non-profit environmental review teams will be tested as a new means of protecting cultural resources.

Support for municipally administered Community Development loan and grant rehabilitation activities will be continued in at least 4 cities. 3 local historic district commissions and 5 historic district study committees will be given detailed assistance during the year, as will the Association of Connecticut Historic District Commissions.

Non-profit organizations fulfill roles which are often not appropriate for a governmental agency in the areas of advocacy, organizing, public information and technical assistance. During Fiscal Year 1982, the Connecticut State Historic Preservation Office will administer grants-in-aid to carry out such activities in statewide and local settings, for the Connecticut Trust for Historic Preservation, Stamford Historic Neighborhood Program, Hartford Architecture Conservancy, Public information, training, capability building and the direct delivery of services are the components of the technical assistance projects.

Staff technical assistance to private citizens will be primarily directed toward assistance in obtaining certifications related to tax benefits. Staff will attend the National Park Service/National Trust for Historic Preservation training seminars on the 1981 Tax Economic Recovery Act. A conference for Connecticut developers and investors will be planned jointly by the State Historic Preservation Office and a local non-profit organization.

The staff historical architect position will be refilled by January 1, 1982; the new architect is expected to take some time in becoming fully integrated into the program. Building conservation advice to the private owners of historic structures will be more limited than in Fiscal Year 1981, although the demand for these services is expected to remain strong.

The management and administration of the State Historic Preservation Office in Fiscal Year 1982 will recognize that there will be only limited discretionary resources available. Grants-in-aid will be distributed using a simple, effective priority ranking system.

Increased integration of the program elements will be emphasized in Fiscal Year 1982. Citizen access will be preserved in a program philosophy that concentrates on the balanced provision of governmental services.







FISCAL YEAR 1982 PROGRAM OVERVIEW

## Introduction:

Delaware's historic preservation program is truly a State program which reflects our particular resources and needs. Administration of the program is based on the premise that the State staff undertakes only those tasks and responsibilities which must be accomplished at the State level. We have developed a network of preservation planners working for County and local governments. Through survey and planning sub-grants, this expansion of program responsibilities into levels of government below the State has increased the program responsiveness to local needs and priorities. Much of the statewide survey and registration program is conducted at the local level, with State staff providing overall coordination and technical support. These tasks are also accomplished through sub-grants to various departments at the University of Delaware. The local level also participates in the protection element program. The local level historic preservation planners assist the State staff in gathering information for review, evaluating the significance of a resource and in arriving at a determination of effect. They also assist the State staff and owners of historic properties in their areas of jurisdiction by offering program information and technical assistance concerning property rehabilitation. Approximately 30% of Delaware's Fiscal Year 1982 anticipated appropriation of \$321,115 is assigned to local governments. At least some of these programs will meet the criteria of certification, when available, as a condition for continued support. Overall, our program strategy is to emphasize the creative use of survey and planning funds and to restrict the use of acquisition and development funds to a limited number of truly worthwhile projects. The Delaware program reflects the special needs of and opportunities offered by administering the program in a small state.

Major Accomplishments During FY'81:

In the face of increasingly smaller federal appropriations and inflating costs, the Delaware historic preservation program was able to maintain a vigorous program in all three program elements. Local government participation through survey and planning sub-grants, has continued in three out of four major local units providing for six preservation planners and assistants. While maintaining a strong focus on the survey and registration (to the degree possible) elements of the program, the local planners have become increasingly involved in the protection element. We have started the process to develop and execute programmatic memoranda of agreement with the Advisory Council on Historic Preservation and three local governments for the expeditious review of their Housing and Urban Development - Community Development Block Grant projects. In addition, the local planners have assisted the State staff with reviews of State and local projects by collecting information and reaching joint decisions on responses. Planning is also an important component of the protection element. The City of Wilmington Planning Office began the preparation of an historic preservation plan for the Quaker Hill Historic District. This will be completed during Fiscal Year 1982 using Fiscal Year 1981 carryover funds as shown on Attachment "A-81".

The statewide comprehensive survey continued on target towards an Fiscal Year 1983/1984 completion date. State staff, local planners and University of Delaware sub-grants contributed to the survey of 1661 historic structures during the fiscal year, which equals a 12% increase in surface area of the State covered. The surveys continued to focus on discrete geographic areas, as opposed to thematic surveys. Completed during the fiscal year were: 1) New Castle Hundred, 2) Blackbird Hundred, 3) the Town of Townsend, 4) the Town of Odessa, 5) the Town of Delaware City, 6) portions of Middletown outside the existing historic district, 7) North Murderkill Hundred, 8) Duck Creek Hundred, 9) Baltimore Hundred, 10) the Town of Selbyville, and 11) the Town of

Some of this data remains to be integrated into the statewide survey files and is not reflected in the progress reports or the above cited figures. The major emphasis for archaeological survey was the development of the statewide resources plan, following the framework of the RP 3 process. With the assistance of a survey and planning sub-grant to the University of Delaware Anthropology Department, the first phase of the plan development for prehistoric archaeology was completed. This study focused on the definition of study units, an evaluation of the existing data base, and recommendations for further research and survey priorities based on threats to the resource and research needs. The first draft of the historic resources plan is currently being prepared jointly by the State staff and the historic archaeologist working for the Delaware Department of Transportation. This section of the plan is scheduled for completion during the fourth quarter of Fiscal Year 1982.

A major focus for the protection element of the program was the completion of a number of old acquisition and development grants. During Fiscal Year 1981, twenty-three grants, or 52 percent of the total active grants during the fiscal year, were completed. This was a particularly special accomplishment as some of these grants had persisted beyond a reasonable expectation of completion. In order to accomplish this, very specific project-related deadlines were established and, if not adhered to without a reasonable excuse, fund withdrawal was threatened. While this approach was not fully applied to most grantees, it was very effective in those cases where grant work was totally stalled. Another major accomplishment was in the compliance area with the development of draft Programmatic Memoranda of Agreement with the Advisory Council for HUD - Community Development Block Grants projects of three local governments. While not fully executed at the close of the fiscal year, the necessary administrative mechanisms for the exchange of project-related information had been established.



Additionally, during Fiscal Year 1981 we continued to fund the administration of a statewide historic preservation revolving fund. Fiscal Year 1981 carryover funds shown on Attachment "A-81" will be used to continue this support during Fiscal Year 1982.

In summary, the special accomplishments of this fiscal year stand out, particularly against the backdrop of decreasing appropriations, rising costs, and general program uncertainty.

#### Problems & Needs:

During Fiscal Year 1981, a number of problems arose in program management and execution and a number of specific needs were identified. Many of the problems arose from program uncertainty and changes at the national level, while a few of the problems and needs are of local origin and concern.

As the Delaware program moves into comprehensive planning in the format of the RP3 process, very definite needs arose in the areas of survey and registration. Although for over one-half of the state the survey program is on target for Fiscal Year 1983 completion, survey in Sussex County has lagged behind. During Fiscal Year 1981, the Sussex County Preservation Planner started the comprehensive architectural and historical survey of Indian River Hundred. This project will be completed during Fiscal Year 1982 using Fiscal Year 1981 carryover as listed on Attachment "A-81". This situation has resulted from the sheer size of the County and the inability of the County Historic Preservation Planner's office to obtain the services of a sufficient number of qualified surveyors. The plan for Fiscal Year 1982 to resolve this problem is to continue our support through a survey and planning sub-grant to the Sussex County Planning Office for historic sites survey. The State staff will focus on the completion of the Kent County survey during Fiscal Year 1982 so that we can commit our survey teams to Sussex County survey during Fiscal Year 1983 and Fiscal Year 1984. During Fiscal Year 1982, an estimated 2450 historic structures will be added to the inventory and 50 archaeological sites.

The University of Delaware Department of Civil Engineering also began a survey of historic bridge structures in New Castle County during Fiscal Year 1981. This activity will continue into Fiscal Year 1982 using Fiscal Year 1981 carryover funds as listed on Attachment "A-81".

The suspension of the submission of National Register nominations during the first quarter of Fiscal Year 1981 created a significant problem for the program. Not only has this moratorium caused substantial delays in listing and a backlog of nominations for review and submission, program credibility has suffered in the face of unrealized public expectations. At the close of Fiscal Year 1981, 22 nominations were in the backlog and 8 new nominations were being prepared. This problem will be partially addressed by finalizing for renotification and submission the backlog of nominations during the first quarter of Fiscal Year 1982. This will be accomplished using Fiscal Year 1981 carryover funds for State staff activities listed on Attachment "A-81". In addition, State staff and sub-grantees are completing and/or preparing new nominations for Review Board approval for properties that were originally scheduled for Fiscal Year 1981 Review Board meetings. For the second half of Fiscal Year 1982, the evaluation of recent surveys and the preparation of new nominations will be emphasized. During Fiscal Year 1982, we plan to prepare and submit at least 13 new nominations from all four categories of nominations. We will emphasize the development of district and multiple resource nominations. The schedule for the substantial completion of the National Register in Delaware has a revised date of Fiscal Year 1987. The damage to the program's public perception and credibility caused by delays in the National Register cannot be easily repaired. Since the National Register listing and its associated recognition and benefits is a central pillar of the program, we have found it to be quite difficult to broaden our base of preservation support beyond the constituency which we have already developed. In fact, this constituency has diminished somewhat in response to the problem with the National Register process and the recent deferrals and

recisions of Acquisition and Development funds. In response to this problem, the State staff and the sub-grantee planning staff has attempted to broaden their participation in technical assistance while concentrating on those elements of the program, such as Tax Act, survey and compliance review, which have remained active.

Similarly, the effectiveness of the protection element of the program has suffered some setbacks due to policy and administrative changes at the national level. An effective protection program in its broadest sense must have as many "healthy" tools at its disposal as possible. These tools (e.g. Tax Act, grants, compliance, public education, etc.) are all necessary as they can be applied either singly or in combination as remedies for the ailments which commonly afflict historic resources. The loss if even one of these tools substantially reduces our ability to provide proper and reasonable protection. In this context, the deferral of Fiscal Year 1980 development grants to the beginning of Fiscal Year 1981 and the rescission of the State's Fiscal Year 1981 development grants has adversely affected at least 28 historic properties targeted for funding which were and are in need of financial assistance. The outlook for Fiscal Year 1982 appears equally as bleak for development grants and, as long as this situation persists, the effectiveness of the remaining tools is diminished. In an attempt to remedy this problem as it has affected the Fiscal Year 1981 development grantees, we plan to assign Fiscal Year 1982 funds to eight of the ten grants which were rescinded; two of the projects had withdrawn their applications. These projects were prioritized over the new Fiscal Year 1982 applicants by the State Grants Selection Committee.

Another approach which we intend to expand during Fiscal Year 1982, especially if funds are not available for development grants, is to offer a wider range of technical assistance approaches. If development grants are not possible, we plan to develop a technical preservation workshop series which would be offered in several communities containing large concentrations of



historic resources. Along the same lines, the Bureau staff will develop a workshop for the local preservation planners on the historic and prehistoric archaeological resources of the state in order to sensitize them to the nature of these resources and their contribution to the understanding of human development.

The Tax Act program also ran into some difficulties during the latter part of the fiscal year as a result of changes in the Tax Act provisions as they relate to the rehabilitation of historic structures. The primary problem was in the confusion which resulted from these changes. The need for current information about the effect of the changes was evident by the number of requests for information which we received in September. This need will be met during Fiscal Year 1982 by preparing new packets of information, and revising existing packages, as information is available, for distribution to interested property owners and the real estate community. In addition, we estimate that we will review 24 applications for certification and determinations of eligibility. This represents a 266% increase of activity over Fiscal Year 1981.

The primary problem in the compliance element of the program was in the timely review of Urban Development Action Grant and Community Development Block Grant projects. The need to streamline this review process became evident by two major cases in New Castle County and the City of Wilmington. In order to meet this need, we began the process of developing Programmatic Memoranda of Agreement with three local agencies and the Advisory Council. In July, we sponsored a workshop on historic sites survey and interpretation of the Secretary of the Interior's Standards for Rehabilitation. In attendance were housing rehabilitation specialists from county and local agencies as well as representatives from the Farmers Home Administration of the U.S.D.A. During Fiscal Year 1982, we plan to execute the PMOA's and begin the process of expedited review for 3 major CDBG programs in the State. Two other local programs, while not pursuing



a PMOA at this time, we will work closely with the State staff in reviewing projects early in the planning stage as feasible. Although we have generally had an excellent working relationship with the Federal Highway Administration and the State Department of Transportation, we are pursuing, in the first quarter of Fiscal Year 1982, the preparation and execution of a PMOA to expedite review of their projects.. preliminary discussions have been held and more are planned for early in the fiscal year. In general, the compliance component of the protection element of the program has been very effective in insuring proper attention to historic resources during the planning phase of projects. We have been assisted in this effort by our local preservation planners and we continue to support their local review efforts by funding these programs during Fiscal Year 1982. During Fiscal Year 1982, we anticipate the review of 716 cases from Federal, State, and local sources.

Another major component of the protection element is public education. We have been able to maintain a level of public information on the program sufficient for a clear understanding of the nature and goals of historic preservation. A major local need which has become increasingly apparent is to disseminate the results of the survey and registration process to the general public. Towards this end, we plan a sub-grant, during Fiscal Year 1982, to the University of Delaware, College of Urban Affairs for the preparation of a manuscript and publication on the history and architecture of southern New Castle County. This publication is designed to be the first in a series which will be completed over a four-year period on history, architecture, and archaeology in the State. We also plan to continue public education through State staff presentations to local organizations, sub-grantee staff presentations to local groups, and the dissemination of program and technical information to interested citizens.

The major problems and needs of the historic preservation program in Delaware have been identified and will be addressed during Fiscal Year 1982. For those problems created by policy or administrative changes at the national level, which are beyond our direct control, we intend to adjust by reorienting priorities and emphasizing different elements of the program. For those locally identified problems and needs, we plan an active program in survey, registration, if possible, and protection to meet those special needs.

#### Fiscal Year 1981 Survey and Planning Carryover & Amendments:

During Fiscal Year 1981, several planned activities were accomplished at less than anticipated costs while others will continue Fiscal Year 1981 activities into Fiscal Year 1982 with Fiscal Year 1981 funds. Approximately \$56,200 of Fiscal Year 1981 survey and planning funds will be carried over into Fiscal Year 1982 and will be used to accomplish those activities shown on the Attachments. Of this carryover, \$25,500 is for projects which will be continuing Fiscal Year 1981 activities into Fiscal Year 1982 while the remaining Fiscal Year 1981 carryover funds will be used to meet Fiscal Year 1982 Minimum Grantee Requirements. The latter funds will be used during the first quarter of Fiscal Year 1982 for State staff activities as shown in Attachments "A-81/82". The Attachments "A-81" provide a list of the projects in the first category and Attachments "A-81/82" show activities in the second category. These supplemental Attachments "A" represent a change of scope amendment to our Fiscal Year 1981 application and also modify our planned activities for Fiscal Year 1982 using Fiscal Year 1982 funds as outlined in the Attachments.



# District of Columbia





## PROGRAM OVERVIEW

Survey-Inventory

The Historic Preservation Office's (HPO) major achievement during FY '81 involved survey and registration. The only city-wide local preservation organization, Don't Tear It Down (DTID), was awarded a contract to conduct a building-by-building survey of a defined area of downtown. It was the first such survey undertaken by the City. To meet the mandated responsibilities of the State Historic Preservation Officer (SHPO) as required by the 1966 National Historic Preservation Act and the 1980 Amendments to it, it was necessary to conduct such a survey in the downtown area, which is experiencing intense development pressure. This survey provides the basis for sound decisions on significant historic properties, while facilitating development through rapid, careful decisions on historically significant buildings.

DTID was selected as the subcontractor as the only city-wide preservation organization in Washington. It had survey teams of trained volunteers, knowledgeable about the area and experienced in historical and architectural research prepared to undertake the task. Because of the consistently heavy workload and the numerous responsibilities of the HPO, the staff could not itself undertake this survey work, but rather monitored the project and provided technical assistance. The results of the survey were data sheets on each building in that area and a report on the methodology used. We now have information on approximately 1000 buildings in 51 squares in the old downtown. With the HPO staff likely to remain small, any future surveys will have to be undertaken on a contractual basis, where funds are available. Subcontracting on the Downtown Survey not only assisted the SHPO to carry out his legislated responsibility, but it also assisted in the training and involvement of volunteers in a significant preservation activity.

Following completion of the survey, DTID, on its own, filed landmark applications for individual historic districts. The HPO is making its own independent review of the survey data. This may lead to HPO applications for designation of additional properties.

Registration

Registration of historic properties in the District of Columbia is a formal process. - It begins with the filing of an application for landmark designation with the Joint Committee on Landmarks (JCL), the City's historic preservation review board. An applicant can be the owner, a governmental unit, or an organization with preservation in its by-laws. A hearing date is set and notice is published at least 30 days prior to the hearing. The applicant presents its case for landmark or historic district designation. Opponents of the application are then heard and the JCL decides the designation issue on the record. If a property is designated, the JCL will enter it into the D.C. Inventory of Historic Sites (Inventory). If it believes a property should be nominated to the National Register of Historic Places (NR), the JCL makes that recommendation to the SHPO.

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Because of the strength of the local preservation law, which will be discussed in the "protection" section, the designation process has come under sharp scrutiny and criticism, primarily from the development community. Two hearings were scheduled in September to hear the cases of the two proposed downtown historic districts that DTID identified from the survey. However, there were attempts to postpone the hearing, by the filing of a Temporary Restraining Order and the subsequent filing of a Preliminary Injunction by property owners who opposed possible designation. Hearings before the JCL on the merits of the cases have not been held because of time spent on procedural matters. The hearings have been postponed until the end of the year.

Most of the dissatisfaction voiced with the proceedings has centered around two issues: (1) the adequacy of the notice published and (2) the legality of the JCL and the fairness of its procedures. The notice is presently being revised to insure that past requirements, the 1980 Amendments, and the proposed draft regulations of the National Register are met. The procedures of the JCL for designation hearings are also under review by the JCL's staff for recommendation of revisions to the JCL.

An issue has also been raised as to the legal authority of the JCL to designate local landmarks. Three of the four landmark designations of FY '81 are presently being contested in the D.C. Court of Appeals. Sponsored by the City, and two federal agencies, the National Capital Planning Commission (NCPD) and the Commission of Fine Arts (CFA), the JCL has previously been held by the Courts not to be a local body, but rather a quasi-federal, quasi-local body that is not subject to the D.C. Administrative Procedures Act. However, that position is being challenged on the basis of changed circumstances, with the argument that JCL decisions have a major impact on local property rights. Creation of a local preservation review board is being considered, with Mayoral action necessary to create such a body. Apart from numerous administrative and procedural issues, the major impediment to creation of a local body has been staff and operational funding. Presently, costs to run the JCL are shared by the City and the NCPD.

### Archeological Surveys

The District of Columbia has also provided assistance for archeological surveys. One such survey by the City was planned during FY '81, but limited fund prevented its accomplishment. The addition of an archaeologist to the staff has led to significant strides in increasing archeological work throughout the City, largely by working with Federal agencies or federally funded projects. The following is a brief description of the types of archeological consultation the HPO participated in during the fiscal year:

1. Mitchell Park Survey - HCRS funded project. This was a survey of prehistoric and 18th and 19th century house sites in a District park. Assistance was provided in writing the request for proposals, monitoring the work, and reviewing the report.

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2. Community Park West - another HCRS funded project. This was a survey of 19th and 20th century Quaker and Black cemeteries. Assistance was provided in the request for proposals.
3. Howard Road Historic District - a WMATA project. This was a survey of a Freedmen's settlement. The staff assisted in the research of the area, and reviewed and revised the work product. This work resulted in a determination of eligibility.
4. Barney Circle - a Department of Transportation funded project of the D.C. Department of Transportation. This was a survey of major late 19th century village sites and Archaic fishing camps. Assistance was provided on survey methods and in reviewing the reports.
5. Whitehurst Freeway - another DOT funded survey of the D.C. DOT. This was a survey of an 18th century tobacco port and 19th century flour and trading port in the Georgetown area of the City. Assistance was provided in the review of the contractor's proposals for preparation of an EIS.
6. Pennsylvania Avenue Development Corporation - Continuous consultation and review of reports in the Pennsylvania Avenue area is provided by the office.
7. Capitol Gateway - a major development project of the District Government that will require some federal assistance. The staff has provided ongoing guidance in the preparation of the EIS and did a preliminary reconnaissance survey of the area that was characterized by 19th century mixed residential and industrial buildings.
8. Civic Center Impact Area Survey - Monitoring of the preparation and completion of the final report of this major study of 19th century workers lives in the Federal City has continued throughout 1981.
9. Consultation was provided for an archeological survey of the Old Naval Observatory.
10. In addition, there have been numerous informal consultations on other federal or federally funded projects.

If there continues to be limited funding, future archeological survey work will have to be done by consultant surveys or by providing assistance to federal or federally funded projects.

#### Protection

Protection for all designated historic landmarks and National Register listed historic districts is provided by D.C. Law 2-144, the "Historic Landmark and Historic District Protection Act of 1978." Believed to be the strongest preservation law in the country, D.C. Law 2-144 requires review and approval for issuance of all permit applications for exterior



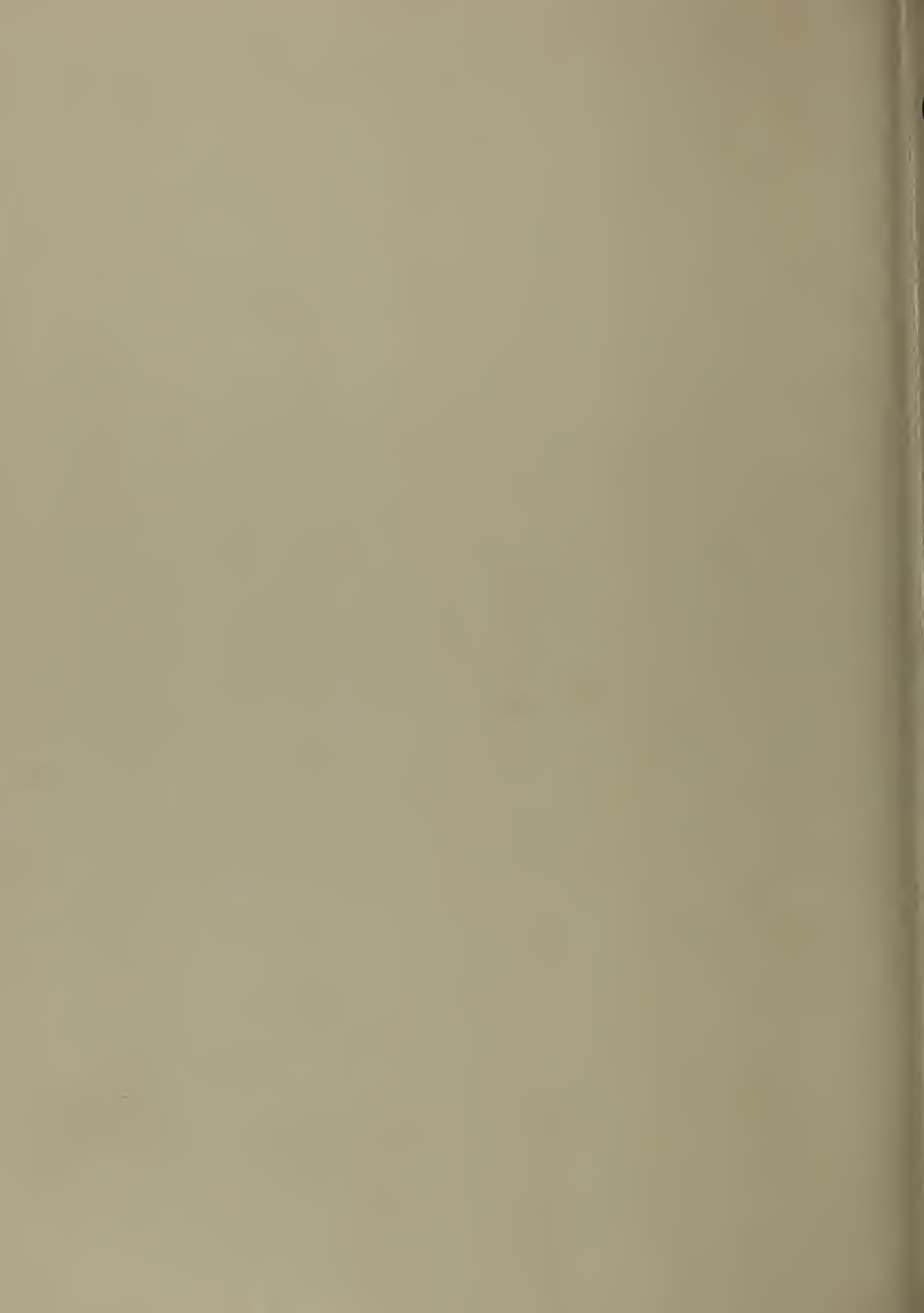
- 4 -

alteration, demolition, new construction, and subdivision of all designated landmarks and buildings in historic districts. During FY '81, 520 permit applications were processed and reviewed. Most of them were received and processed by the HPO within two to five days. Two public hearings, consuming ten days in addition to the preparation time, involved three to four staff members. Also, during the year, decisions in three previous contested case hearings that had been appealed to the D.C. Court of Appeals were unanimously upheld. These actions are viewed as judicial approval of the City's administration of its local preservation protection legislation. The two decisions issued following the two public hearings during FY '81 are now presently pending before the Court of Appeals.

Because of the strength of the Act and the increasing number of landmarks that will potentially be affected by the Act, administration of the Act requires approximately 85% of the time of four members of the eight member staff. After two and a half years of administering the Act, it is clear that a review of the Act and its procedures is necessary in order to insure continued efficient, administration of the Act. It is our belief that as a protective measure, the Act has been very effective. A major deterrent to the demolition of historic landmarks, the Act has led to alternatives to demolition. Under the alteration and new construction provisions of the Act, the integrity of historic landmarks and districts has been protected by achieving more designs compatible with historic structures.

Administrative changes by the staff as well as possible statutory changes will be made during the coming year.





## PROGRAM OVERVIEW

### 1981 Accomplishments.

Reference should be made to the Special Accomplishments section of the enclosed FY81 End-of-Year Report, which details a number of significant areas of progress in prehistoric archaeology, historical archaeology, and architectural history.

Perhaps the most important 1981 discovery resulting from Commission-sponsored surveys was the site of the French Fort Pentagouet in Castine, a fortification dating from the mid-17<sup>th</sup> century. The precise location of this site was not known until subsurface testing by the University of Maine in July, 1981 uncovered parts of the cobbled parade-ground (with gutters) and sections of one of the bastions. This latter feature was constructed of slate from the Mayenne district in France and stood to a height of nearly seven feet when excavated. This site promises in the coming years to be of nationally-significant scientific importance. The fact that it lies perched on a 15-foot erosion scarp means that its discovery came in time to identify its precarious locus. Steps are and will be taken in the next few years by the University to seek funding sources both public and private to conduct erosion control and further archaeological investigation.

The End-of-Year Report also alluded to the design and passage of new state antiquities legislation (An Act to Preserve Maine's Archaeological Heritage). The Commission staff archaeologists (Dr. Bradley and Dr. Spiess) worked together on drafting this law, while consulting with the S.H.P.O., the State Museum, and university archaeologists. Briefly, the new law provides harsh penalties for disturbing state-owned sites listed in the National Register, as well as non-state-owned registered sites for which the owners have entered into written agreements with the Commission. The law additionally establishes a formal excavation permit application through the Commission for research on protected sites. Finally, it exempts all state and university archaeological data (specifically site locations) from state right-to-know laws.

This new antiquities legislation was a product of the Commission and the Maine State Legislature's State Government Committee. All parties involved with its creation recognized the need to tighten and streamline Maine's former patchwork of antiquities laws, while at the same time avoiding coercive and unpopular provisions which might have trampled private property rights. Now sites of National Register significance can be effectively protected from vandalism or other ground-disturbing activities, regardless of the party or funding source involved. The Commission will be pleased to send copies of this legislation to other states upon request.

### Problems and Needs.

Survey. The most fundamental problems in surveying Maine for all classes of historic resources are that the state is geographically very large (equal to the combined area of the five other New England states), with a very small population (just over 1 million), and an extremely depressed economy (ranked 50<sup>th</sup> among the states in per capita income adjusted for cost of living). These problems add up



to a situation whereby trained manpower is very limited, as are potential sub-grantees for survey projects. Non-federal funds to match NPS grants are virtually non-existent. Coupled to this has been the relative inadequacy of the Federal funding levels in the past ten years (an exception being FY 1979). For example, Maine's 3,000-mile coastline is known to be littered with shipwrecks dating from the 17th to the 20th centuries, but the high cost of underwater survey has meant that this specialized and important work has only just begun to be undertaken. The 70/30 funding ratio implemented for FY 82 is long overdue as a partial solution to these problems, but it is clear that the overriding need is for adequate levels of Federal funding to enable many diverse and wide-ranging historic resources surveys to be intensively implemented in the near future. Without such a Federal commitment, a comprehensive inventory of Maine's historic resources of all types lies in the distant future.

Registration. The recent study of all state programs by the staff of the National Register ranked Maine's performance in this vital area favorably with that of some of the largest states. This is particularly significant, in that all nominations are prepared in their entirety by the small Commission staff to ensure consistency and quality. Maine will continue to follow this policy as long as it is possible to do so.

Protection. The FY 81 End-of-Year Report detailed the catastrophic problem of coastal erosion on archaeological sites of both the prehistoric and historic eras. This problem has been thoroughly documented and recorded by Commission-sponsored surveys, and the statistics are grim. The number of obliterated or all but obliterated shell middens identified each summer is alarming, and it is clear that at least 50% of Maine's coastal sites have been lost over the years. Studies by the University of Maine on coastal subsidence indicate that tidal levels are rising at a rate of about 25 centimeters per century--a disastrous rate in geological terms. Severe winter storms accounting for overnight erosion of up to two meters occur on an average of three times per decade. Less severe but clearly damaging storms occur at least once annually.

There are but two solutions to this problem: major salvage excavations and erosion control measures (temporary by means of rip-rap or permanent through the installation of gabions). It is all too clear, however, that either solution will require major and long-term funding. In other words, the problem has been carefully identified and various solutions (treating sites on a case-by-case basis) have been designed. Without a firm Federal commitment to assist in these measures the solutions cannot be effected. It is easy to proclaim that there are many non-federal funding sources for historic preservation, but the fact is that private and commercial foundations not unnaturally seek to fund dramatic research projects. It is inconceivable that such sources of funding would leap to pour hundreds of thousands of dollars into rip-rap and salvage operations. Such mundane but essential protective efforts must in large part be the responsibility of the public sector. Given the nature of the Maine economy in the foreseeable future, "public sector" in this context can only be translated as "Federal."

One other problem in the area of protection is the continuing and long-term need for public education. This particularly pertains to stabilization and restoration of the built environment along proper guidelines. The Commission places a high staff priority in this area by means of personal appearances, packaged lectures, on-site consultations, television appearances, and publications. All of these services are provided free of charge to the public, as well as to sister state agencies. In the

area of public education, the Commission at this time places the highest priority on publications, appropriate in a geographically large state with hundreds of far-flung villages and towns. Scheduled for release in 1982 are free public information releases on the responsibility of the public to archaeological sites (through the Institute for Maine Archaeology and Public Education), Indian Canoe Routes (through the Maine Archaeological Society), the Goddard Site (Maine State Museum), the Young Site (Maine State Museum), and the forts of Pemaquid (State Bureau of Parks & Recreation). Such publications not only educate the layman against vandalism or unintentional damage to sites; they also lead directly to public involvement in reporting sites to the Commission staff. Therefore, they play a vital and direct role in statewide survey and inventory. The need here, as usual, is for continued Federal funding support to supplement the very meager non-Federal sources of match in Maine.

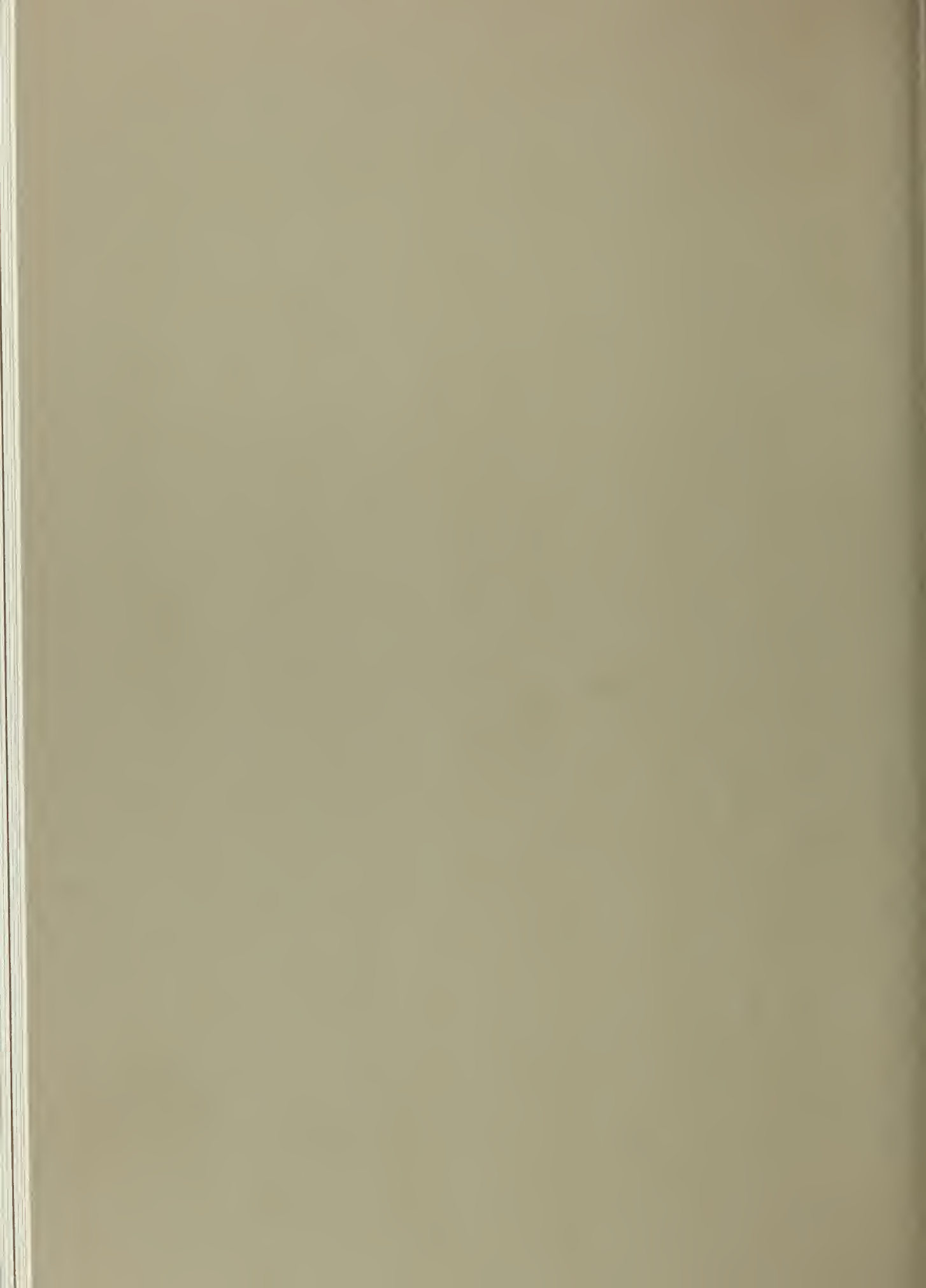
Note: The Commission will use a small amount of FY 81 funds following the start of FY82 to assist in the cost of staff salaries and other administrative expenses. See amendment to Fy 81 application.

Note: 10% of Maine planning estimate figure for FY82 has been reserved for local government programs pursuant to P.L.96-515.









### III. Program Overview Statement

#### A. Retrospective--Accomplishments for Fiscal Year 1981

##### Introduction

The accomplishments for FY-81 need to be viewed in light of the uncertainty and change which characterized historic preservation at the national level and effected routine planning and management of the Maryland State Historic Preservation Office. Last minute changes to the FY-81 work program instructions constituted the first of a series of interruptions including the rescission of FY-81 allocation, uncertainty on reprogramming obligated funds, the lack of regulations for the nomination of privately-owned property to the National Register, and, principally, the proposed zeroing-out of the FY-82 Historic Preservation Fund.

The Maryland Historical Trust was able to continue normal operations through FY-81 owing to the management improvements instituted in the past three years. The management changes established clear lines of authority through a reorganization of the staff by programmatic functions; overhauled the control of and access to budgetary matters assuring the means to comply with federal and state requirements and the maintenance of a clearly auditable record; and improved the management of compliance activities through a rapid turnaround of project reviews and the creation of a staff capability to expedite projects in critical development areas (through the provision of a special survey team on the staff). Once the improvements were implemented the chief managers of the Trust could then direct their efforts to the immediate problem without jeopardizing the successful completion of routine activities.

The paramount achievements for historic preservation FY-81 are the passage of the National Historic Preservation Act of 1980 and the existence of a \$26.5 million fiscal year 1982 Historic Preservation Fund. These represent a team effort largely of the National Conference of State Historic Preservation Officers, the Preservation Action citizens coalition in Maryland, and the National Trust. To the extent that Maryland preservationists worked towards these goals, they share in the sense of achievement.

##### I. Survey

###### a. Areas of Energy Development

###### (1) Coal Basin

The Trust completed an intensive survey of the 778 square miles of surface mining areas in the state identifying all standing structures of historic merit and evaluating the significance of the inventoried sites against the National Register criteria. The survey was conducted to expedite the

process of issuing permits for coal mining activities. With the completion of this survey 18% of the 9,874 square miles of the State has been intensively surveyed for standing structures. (See Attachment A FY-81 Annual Application and Obj. 3 and 16a.)

(2) Siting of Power Plants

The State agency responsible for selecting and purchasing sites for future development as power plants contracted the Trust to identify all historic sites (including archeology) as a part of the site selection process.

b. State plan for archeology in transportation corridors.

The Trust completed a predictive model for archeological site frequency and significance in highway corridors. The conclusions were based on 18 months of background research and field work, an examination of data on all known archeological sites in the State, and a review of all reports on archeological work in highway corridors. The predictive model, designed to serve the management needs of highway planners, indicates no archeological work will be necessary within 20th century highway rights of way and that archeological sites occur within earlier rights of way and in undisturbed ground suitable for highway construction at a rate of one site every two miles of linear roadway. (See Obj. 3c.)

c. Outside funding sources for surveys

The Trust secured \$209,595 outside of the Historic Preservation Fund to support survey activities. (The figure does not include match for Historic Preservation Fund supported surveys.) The staff generated the funds from federal and state agencies through continued contact reminding the agencies of their responsibility to identify historic properties under their jurisdiction. Surveys will assist State and federal agencies in planning future development. (See Obj. 3c.)

d. Publication series

The principal accomplishment for FY-81 is a remarkable publication program. A total of 13 new documents are available on Maryland archeology including a Statewide standard for methodology and content of reports. (See Appendix) Three volumes (2 urban, 1 county-wide) of the Inventory were published (See Obj. 3f and 20b.)

e. Public Participation

The Trust revised its project selection process to follow the model issued by Heritage Conservation and Recreation Service and ranked all FY-82 applications for Historic Preservation Fund assistance based upon the criteria and scheduling of the open project selection process. (See Obj. 3b and 10b.)

f. Community Education

Trust staff members taught 2 college courses (architectural history and survey methodology) for the Goucher College historic preservation bachelor's degree program. General educational activities -- workshops and conferences -- continued to draw large audiences. This sort of training is important to expand the historic preservation community and improve skills of avocational preservationists. (See Obj. 3c and 20 a and c.)

2. Registration

a. Local Government Certification

The MHT began steps toward the process of certifying local governments for participation in the national historic preservation program in FY-81. The MHT contracted with the Maryland Association of Historic District Commissions, the organization that represents 30 local jurisdictions in Maryland which have historic preservation commissions. Maryland Association of Historic District Commissions will 1) notify all governments of the opportunity to participate in the historic preservation program, 2) prepare a draft implementation strategy and plan for the State Historic Preservation Officer, and 3) provide technical assistance both before and after a community has been certified. (See Obj. 23.)

b. Evaluation assistance to project sponsors.

The Maryland Historical Trust special survey team prepared 12 determinations of eligibility at the request of project sponsors, usually Community Development Block Grant applicants. The purpose of the team is to expedite compliance with Section 106 of the National Historic Preservation Act in order to keep the level of conflict at its current low level. The greatest source of contention in the 106 process in Maryland has come from the responsibility of the federal agency to identify and evaluate historic properties in the target area. If the Trust can perform this function for the project sponsor, the conflict in preservation compliance is reduced if not eliminated. (See Obj. 8b.)



c. Continuing interest in National Register nominations.

The demand for consideration of properties for National Register nomination remained high in spite of the 9 month closure of the National Register to privately owned property. (See Obj. 7a.)

3. Protection

a. Compliance with Section 106 of the National Historic Preservation Act

The management changes and the trend toward the acceptance of historic preservation in Maryland have combined to create an atmosphere in which Section 106 reviews occur without controversy and conflict. The improvement is due to the achievement of two goals initiated in the 1970's: 1) the successful education of State officials of the implication of the NHPA and 2) the demonstration by the State Historic Preservation Office that the 106 process functions efficiently without project delays. As the Trust staff has demonstrated that the process works State agencies understand the importance of historic preservation and voluntarily submit development projects for Trust review and comment. (See Obj. 6, 8 and 2b above.)

b. Easements

The donated easement program continues to grow. Three property owners donated perpetual easements on 3 historic properties covering 550 acres of land. (See4 Obj. 21c) 21 easements were granted in exchange for grants.

c. State support for restoration.

The 1981 session of the legislature appropriated \$300,000 for development projects. (See Obj. 21)

d. Open Project Selection

See above Survey and Public Participation.

## B. PROSPECTIVE

### 1. Problems.

The nineteen eighties propose a whole new set of problems to the Maryland Historical Trust from those of the previous decade. The seventies were characterized by conflict with the public and the private sector to secure some minimal level of preservation consideration for historic resources. Although Maryland suffered some notable losses of historic property, by the end of the decade preservation had gained legitimacy and a place in the planning processes.

In contrast, the problems of the eighties center around the growing gap between the increasing preservation mandates on the SHPO office and the decreasing level of resources available to meet those mandates. The challenges created by this new climate direct attention toward the allocation of scarce resources, setting priorities, and maintaining levels of service to retain past achievements.

### Survey

While the universal problem of State historic preservation offices is that the Survey is not complete, The Maryland Inventory of Historic Sites is approximately 10% complete. Whereas in the past incomplete survey data was a major source of conflict, today mechanisms exist to provide the necessary data. The Trust has a special interdisciplinary team to conduct surveys in advance of critical development projects. The major development centers of the state -- Baltimore and Washington suburbs -- have established preservation as a part of their planning process. The surface mining areas of the State have been intensively surveyed. The State energy development agency has contracted with the Trust to identify historic properties well in advance of power plant site selection. The State Highway Administration conducts surveys as a routine part of project planning.

Although historic preservation has become an accepted part of the State development process the continuation of that relationship remains an important goal. The provision of information from the Inventory in a form readily understandable by non-preservationists must continue.

The future of the survey and historic preservation also rests on an educated constituency. Building that constituency and training avocational preservationists has never been more important.

### Registration

The chief problem in the Registration program element for FY-81 was the lack of regulations to implement the changes to the National Register nomination process required by the 1980 Amendments. The closure of the Register to privately owned property was frustrating to nomination sponsors as well as to the staff.

The Trust has been able to manage the other Registration activities -- certifications of significance, determinations of eligibility, nomination of federal property -- sufficiently well to have avoided any problems.

### Protection

The uncertainty over the Historic Preservation Fund was and is the principal problem relating to protection activities, especially acquisition and development sub-grants. The long delay in the preparation of regulations allowing the deductions for the donation of conservation easements has crippled the gift easement program. Changes to historic preservation tax incentives effected by the Economic Recovery Act of 1981, particularly the substantial rehabilitation test, threaten to considerably reduce the volume and quality of privately sponsored rehabilitation projects.

## 2. Needs

The immediate needs of the Maryland Historical Trust in light of the problems listed above are to maintain the levels of service and management systems evolved in the seventies and to establish a planning capability that will enable the Trust to do more historic preservation with less federal money. FY-82 will represent a continuation of present levels of effort and one major new directive: resource protection planning.

The following section briefly describes how the levels of effort will be maintained and outlines the new initiative to revamp existing planning systems.

### 3. Planned Activities for FY-82 to Address Problems and Needs

#### All Program Elements

##### Comprehensive Statewide Historic Preservation Plan

In light of the trend toward limited support for Historic Preservation Fund while the demand for State Historic Preservation Officer services remains constant or grows, the necessity for a comprehensive Statewide planning system becomes essential (SEC. 101(b)(3)(C); GMR 5 Activity d). The staff will continue the initiatives to revise the existing planning system. Trust will follow the structure for the protection of historic resources as outlined in Resource Protection Planning Process, September 1980, Division of State Plans and Grants. The first step in FY-82 will be a workshop on planning for protecting historic resources conducted by John Knoerl of the Division of State Plans and Grants and Gretchen Kilmoski of the Ohio Historic Preservation Office on October 8, 1981.

The Trust expects that the planning process will provide the basis to achieve the following goals.

1. Define the purpose of the Maryland Historical Trust and how the Trust relates to to the National Historic Preservation Act
2. Review the programmatic units of the Maryland Historical Trust examining both historic resources (survey, registration, sub-grants) and human resources (County committees, education efforts) to assess and define
  - a. past level of effort
  - b. areas of need
  - c. optimal solutions
  - d. achievable results

3. Establish priorities for historic preservation activity based on information gained from the first two steps. The Trust anticipates publishing a plan by the end of the fiscal year.

The comprehensive plan is anticipated to have two benefits. First, it will address the principal historic preservation need for the eighties (See Problems Introduction and Needs above): how to do more with less. Second, the plan will assist the Trust in maintaining the gains achieved in the 1970's of incorporating historic preservation in the broad State-wide planning and decisionmaking processes. The plan itself will provide a document which will articulate historic preservation activities and goals in terms understandable to non-preservationists.



## Survey

The Maryland Historical Trust intends to continue its survey effort (NHPA Section 101(b)(3)(A), (D) and (G)) as a high priority. The Historic Preservation Fund is a primary (if declining) source to provide financial support for survey. During FY-82 the Trust intends to use the Historic Preservation Fund (FY-82 Attachment A GMR 1 and 2 Activities a & c) to conduct surveys in three rural areas and one urban area as well as to maintain an archeological survey capability in lower Southern Maryland. Outside funding sources (Activity b and e) have become more important as a means to conduct survey work. Notable among the projects to be funded in FY-82 is an interdisciplinary team examining locations for potential energy development projects. The emphasis on 11593 surveys of federally owned land will continue.

The decisions about needs for future survey activity are based on priorities established through the open project selection process (Activity d). The project selection process will be used to rank applications for FY-83 Historic Preservation Fund assistance.

The revision of the comprehensive planning process (GMR 5 Activity D; see below) following the resource protection planning format is expected to facilitate the survey process especially in prioritizing survey needs.

Once surveys are completed the data must be useful and available to non-preservationists. Publishing survey data is important (See Activity j) but not as urgent as making the data available for use for all types of planning. For that reason the Trust emphasizes and will emphasize in FY-82 the encoding of survey data on the State land use computer which contains information about natural features, present development, and proposed development (e.g., sewer plans). Second, the Trust will continue its uniform mapping project to provide locations of Inventory and Register sites as well as areas of survey coverage in an easily reproducible format. (See Activity i)

The declining dollars from the Historic Preservation Fund result in a declining capability to employ preservation professionals. The preservation of historic resources is best assured by an educated, committed constituency. In order to assure a long term historic preservation capability the Trust intends to continue to emphasize its public participation and education programs (Activities f, h) to train avocational preservationists through workshops, conferences, college courses, and seminars. (See Activities j, k, and l for other public participation activities.)

## Registration

In FY-82 the Maryland Historical Trust will maintain its level of effort in evaluating the significance of properties (Sec. 101 [b][3][B] and GMR 3 and 4). The activities center on maintaining the National Register nomination process (GMR 3 Activity a-c) and evaluating the significance of properties against the Register criteria to facilitate other preservation functions: tax incentives, the 106 compliance process, federal agency responsibilities. (GMR 4 Activities a-b). Further, the Trust will continue initiatives begun in FY-81 to assist the certification of local governments to participate in the national historic preservation program (GMR 3 Activity d).

The re-opening of the National Register to non-government owned historic properties anticipated in early FY-82 will eliminate the principal problem experienced in the previous fiscal year. The differential between the demand to have properties listed on the Register and the Trust supply of staff to respond will remain. The September 1981 National Park Service evaluation of the Maryland nominations instituted in FY-80 are improving the quality of nominations. The closing of the Register to privately owned property in FY-81 and the resulting drop in submissions makes it difficult to track the effectiveness of the internal changes. It is anticipated that in FY-82 the quality of nomination forms will continue to improve so that the rate of National Park Service review of Maryland nomination forms will drop from one in three to one in five pursuant to expedited nomination form review mandated by the 1980 Amendments. (GMR 3a)

The Trust intends to continue to expedite responses to all requests for State Historic Preservation Officer evaluations of significance. This is essential to encourage private preservation efforts through tax incentives, to avoid costly delays in federal undertakings, and to encourage federal agencies to continue fulfilling their preservation responsibilities on federal lands. (GMR 4)

The ground work has been laid in FY-81 for implementation of local government certification in FY-82. The Trust has contracted with the organization that represents all the Maryland historic preservation commissions to prepare implementation mechanisms for Maryland (subject, of course, to Interior regulations). Through the contract all local governments in Maryland have been notified of the certification program. Meetings have been and will be scheduled with local government officials to explain the certification program. The State Historic Preservation Officer will receive a draft set of eligibility criteria for certified communities, draft application form, and an apportionment formula recommendation. The liaison established with local government officials and the work proposed for FY-82 indicates that Maryland will be able to implement local government certification with few difficulties. (GMR 3 Activity d)

## Protection

The Maryland Historical Trust intends to continue its commitment to compliance with Section 106 of the National Historic Preservation Act in an expeditious manner emphasizing assistance to project sponsor agencies (SEC. 101 (b)(3)(E)(F)(G), GMR 5 Activity a-c). The Trust will continue efforts to minimizing conflict. Although no Historic Preservation Fund monies will be used for construction projects (GMR 6), the staff will monitor existing projects and easements, as well as making a special effort to assist developers with the historic preservation tax incentives authorized under the Economic Recovery Tax Act of 1981 (GMR 4 Activity b).

In spite of the harsh Historic Preservation Fund A & D funding realities which have been widely broadcast through Maryland by the Maryland Historical Trust, the State Historic Preservation Officer received for FY-82 39 applications requesting a total of \$2,370,000 in grants for projects throughout the State. These applications reflected a total of over \$3,000,000 in non-federal monies committed to projects as match. Obviously there exists a tremendous cash shortfall, and a great need for Historic Preservation Fund A&D funds. The State FY-82 capital dollars committed to A&D (\$300,000) does not begin to approach the level of requests (\$8,500,000). The non-federal dollar commitment, and the desire and expertise needed to capitalize on A & D as an important protective measure have never been greater, but federal dollars to make up the shortfall are non-existent. At minimum then, The Maryland Historical Trust must:

1. devise and broadcast alternate funding strategies for protective A & D activities at the local level. Total federal grant monies in the past have gone 50% non-profit, 25% government, and 25% private efforts and strategies in this area will be targeted accordingly.
2. Improve knowledge and encourage use of Federal and State tax incentives for preservation projects particularly
  - a. Federal tax credit (despite its reduced applicability)
  - b. State tax deduction
  - c. State property tax credit
  - d. State and Federal deductions for the donation of preservation easements.

Additional incentives will be explored and developed.

3. aggressively promote the best protective device -- easements. The gift easement program must be dramatically stepped up to compensate for those previously received in exchange for Historic Preservation Fund A&D grants. Regulations concerning tax deductions must be made available as soon as possible.







### III PROGRAM OVERVIEW

#### A. Major Accomplishments in FY81

During FY81 the Massachusetts Historical Commission (MHC) maintained the high quality of its preservation program despite the uncertainties and impacts resulting from the 1980 Amendments to the National Historic Preservation Act and the recission of funds. Impacts to MHC's planned program are most clearly seen in the grants cycle and National Register process: other program elements were less directly affected by changes in the federal preservation program.

#### GENERAL

FY81 was the second year of implementation of Massachusetts State Preservation Plan (Cultural Resources in Massachusetts: A Model for Management). During the year MHC successfully achieved intergration of the program elements, and followed the guidelines of the plan in achieving a rational and reasonable decision making process. Specifically, during FY81, the state survey team completed the Reconnaissance survey of two study units (Boston and Southeastern Massachusetts); consequently the three study units which are the most highly stressed by the development pressures (the two above plus Eastern Massachusetts) have now been surveyed. Management recommendations and study units operating plans will be completed by the first quarter of FY82. As a result of the survey, the National Register evaluation process is clearer: the survey has identified both local and regional historical development trends, allowing an analysis of the significance of properties at the state and federal as well as local levels. Finally, a major goal of the state plan, reducing ad hoc decision making and "crisis management" has been realized; management decisions are consistent because: 1) MHC decisions are resource based and 2) MHC's planning efforts are integrated with the planning efforts of critical agencies. In particular, MHC worked closely with Federal Highway Administration/Massachusetts Department of Public Works, Department of Housing and Urban Development/Executive Office of Communities and Development and Environmental Protection Agency/Department of Water Pollution Control representatives in coordinating the goals of the Massachusetts State Preservation Plan with other agencies plans.

#### SURVEY

Beginning in the fall of 1980, MHC took, for the first time, an active role in archeological research within the state. In a unique cooperative agreement among the Andover Historical Society, Andover Historical Commission, R.S. Peabody Foundation for Archeology, Hewlett Packard Cooperation and Digital Equipment Corporation, MHC sponsored an historic and archeological survey of the Shattuck Farm in Andover. The survey was directed by Dr. Barbara Luedtke, U.Mass, Boston, and was funded by the Shattuck Farm Trust. Phase I of the project was completed in February, 1981. The results are presented in "An Archeological Survey and Documentary History of Shattuck Farm" Phase II will be completed this fall.

### EVALUATION

During 1981 MHC produced an inexpensive but effective brochure entitled "There's a Difference". It explains the differences between local historic districts and National Register districts. Given the high volume of each type in Massachusetts, considerable confusion existed within the communities. The brochure was designed to help reduce this confusion. It has been so well received by the communities that a second printing will be needed in 1982. MHC recommends this approach to other states with similar circumstances.

During 1981 as a result of the Boston Area reconnaissance survey, MHC recognized the need to assess state significance of the Metropolitan Water Works and develop realistic plans for its preservation. Accordingly, MHC began a thematic nomination for the properties in this system. This recognition and approach marks a shift from MHC's prior emphasis on local significance and was made possible by our state reconnaissance survey and State Preservation Plan. It will be our first staff prepared thematic nomination which we plan to submit in 1982.

### PROTECTION

During 1981, MHC developed programmatic approaches to the identification, evaluation, and protection of the state's historic bridges and lighthouses in cooperation with the Massachusetts Department of Public Works and the U.S. Coast Guard.

An important example of development projects completed during 1981 is the Sheffield Covered Bridge, one of only two remaining 19th century covered bridges in the state. The Sheffield Historical Commission spearheaded fund raising drives to match a \$25,000 A&D grant for the restoration of the bridge. The project drew considerable attention within and beyond the community. James Parrish, the regional preservation planner at the Berkshire County Regional Planning Commission carefully documented the restoration on the project. The project clearly demonstrates the great value of A&D grants in protecting historic properties while stimulating public interest in and concern for its heritage.

Finally, MHC provided financial assistance to the Boston Landmarks Revolving Fund during 1981. A key publication resulting from this assistance was the Preservation Revolving Fund Casebook of Historic Boston, Inc. This Casebook catalogues highly significant and endangered properties within the city of Boston and serves a key reference tool for those looking to preserve and protect the city's landmarks. The progress of the Boston revolving fund has been significant this year and MHC recommends it as a model for other communities.



## B. Assessment of Problems and Needs and Discussion of How Needs will be met

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As a result of the 1980 Amendments to the National Historic Preservation Act and the changing nature of the federal program, several uncertainties face the Massachusetts preservation program in FY82. The Massachusetts Historical Commission (MHC) needs to develop a strong state program consistent with the new amendments in order to maintain the high quality of preservation efforts in Massachusetts. During FY82 new National Register regulations, new tax act regulations, new Advisory Council for Historic Preservation regulations and new regulations certifying local governments are all expected, and each is expected to have substantial impact to MHC programs. In addition, the Department of Interior has indicated the likelihood of declining federal support for state preservation programs during FY82. Therefore, in order to maintain a successful preservation program in Massachusetts during 1982, MHC intends to strengthen the Massachusetts state preservation program, and to help strengthen local preservation programs. The first objective will be met by conducting a comprehensive review of state preservation statutes and submitting amendments needed to bolster MHC's abilities to meet state and national preservation goals, and by adhering to the management framework outlined in the Massachusetts State Plan which provides for consistent, reasonable and defensible decision making. MHC will help strengthen local preservation efforts by reviewing and commenting on the draft regulations to certify local governments; enthusiastically promoting and supporting the certification of qualifying local governments and finally by adhering to MHC policies designed to support local preservation efforts such as accepting National Register nominations only through the local historical commissions; soliciting local historical commission comments on potential sub-grant projects; and supplying technical assistance on a wide range of preservation issues. Pursuant to P.L. 96-915, 10 percent of the MHC planning estimates (\$53,779) will be reserved for local government programs. We have added these two key objectives to Attachment A as GMR #7 and 8 because we believe them to be required goals of our program in 1982.

### SURVEY

During FY82, MHC needs to continue survey efforts towards completing the statewide inventory of historic and prehistoric properties as required in the 1980 Amendments to the National Historic Preservation Act. MHC's approach to identification includes both reconnaissance and intensive levels of effort and MHC intends to continue survey efforts according to the framework outlined in the Massachusetts State Preservation Plan. MHC plans to continue the State Reconnaissance survey of historic and prehistoric properties. During FY82, the historic team (consisting of a geographer architect, historian, industrial historian, and historical archeologist) will survey the Connecticut Valley Unit using the methodology developed in FY80. The Connecticut River Valley Unit is the next priority unit noted in the State Plan; historic properties are significantly threatened since this area is one of the fastest growing areas of the state. The prehistoric team will examine archeological collections at the Peabody Museum, Salem, the



Concord Antiquarian Society, and Plimoth Plantation. The completion of inventory efforts at these facilities as well as the museums already completed during FY80 and FY81 will provide the basis for a comprehensive prehistoric reconnaissance of Eastern Massachusetts including the Essex, Boston area, Eastern Massachusetts, Southeast Massachusetts and Cape Cod study units. A key support activity will be the dissemination of survey information to local commissions, public agencies and the academic community. The first three study unit reports will be printed and distributed. Also, we will take advantage of regional forums and meetings for enhancing the use of the survey data.

GMR #1  
GMR #2

In addition to continuing the State Reconnaissance survey, MHC plans to complete intensive surveys in communities where development threats are high and where priority survey efforts are weak. This objective will be met by selecting and contracting for S&P subgrant inventory project in priority communities. MHC will monitor the grants for both technical and financial compliance to the contract scopes in order to ensure professional quality survey products. Similarly, MHC will review and integrate the results of FY81 S&P projects and intensive surveys conducted as a result of compliance with the statewide inventory. We will also update and disseminate our useful Bibliography of Archeological Survey and Mitigation Reports.

GMR #1

MHC also intends to support local amateur survey efforts. MHC will accomplish this objective by renewing and integrating the results of local survey efforts with the state inventory. Staff will also continue its vigorous program of technical assistance to local historical commissions by sponsoring workshops and attending meetings as well as responding to phone and letter inquiries.

GMR #1,2

A key survey support activity for FY82 is the support of regional preservation planning efforts in order to better service local historical commissions. MHC will offer S&P sub-grants and contract with regional preservation planners-in at least one regional planning agency, and intends to develop preservation planning expertise through S&P sub-grants with private and public land managing groups.

Another survey activity for FY82 is to develop a reliable base for stimulating the re-use of industrial buildings. Our reconnaissance survey confirms that many industrial buildings are threatened by abandonment and deterioration. Because they offer important alternatives for industrial growth and expansion MHC will examine possible strategies to encourage re-use of industrial buildings for industrial purposes. The basis of this activity is the development of a sound survey base. Therefore MHC staff will analyze the results of the State Reconnaissance Survey and will select priority areas for more intensive industrial building survey. Parenthetically, MHC is co-sponsoring the Boston Area Inventory of Historic Industrial and Engineering Sites with the Historic American Engineering Record and the Southern New England chapter of the Society for Industrial Archeology (SIA). The National SIA in 1984 will be in Boston.

An important need of MHC's survey program is the security of the survey

data from theft, damage and deterioration. During 1982 we will explore and implement appropriate security measures for our survey data.

### EVALUATION

#3 During FY82 MHC needs to evaluate the significance of historic properties in the state in order to provide for the designation and protection of the important properties as required in the 1980 Amendments to the National Historic Preservation Act. The specifics of the FY82 Evaluation program are uncertain in the absence of National Register regulations. Since the National Register is the keystone to a viable state preservation program, MHC's most pressing need is for the Department of Interior to publish new regulations. While we are unable to submit nominations to the State Review Board, MHC will continue to prepare nominations until new regulations are adopted. As soon as new National Register regulations are promulgated MHC plans to submit the nominations prepared during FY81 for Review Board review and forward nominations to the Keeper of the National Register. MHC will notify property owners and bring for review Board consideration forms prepared during FY81 including: 50 individual properties; 17 districts; and 1 multiple resource nomination. In addition, MHC intends to prepare and submit nominations of statewide significance. During FY82 MHC will work with federal and state agencies to evaluate the significance of properties whose futures are in jeopardy due to problems of public management; and MHC will initiate preservation planning programs with the agencies. MHC plans to prepare or help prepare thematic nominations for light houses (with the United States Coast Guard), the Metropolitan District Commission water system, Olmsted Parks (with the Olmsted Association), and historic bridges (with the Massachusetts Department of Public Works). A third evaluation objective is to help community planning efforts by preparing comprehensive evaluations of the historic properties within a community, and preparing National Register nominations in conjunction with local public preservation agencies. MHC will prepare and submit six (6) multiple resource nominations during FY82.

#3 During FY82 MHC plans to continue to nominate properties identified as important through local survey efforts. MHC will help local historical commissions prepare nominations for individual properties and districts and will also help prepare nominations for threatened properties when registration might help protect the resource. MHC expects to nominate 50 individual properties and 8 historic districts in 1982. MHC also intends to nominate properties which are eligible for the National Register whose owners want to take advantage of tax incentive program. MHC will review and submit nominations for individual properties, and will review and submit and forward for certification Part I of the Tax Act application. Approximately one third of the individual nominations prepared in FY82 are expected to be tax act related nominations.

4 Finally, MHC plans to evaluate the significance of federally owned properties and to prepare opinions on the National Register eligibility of properties within the project areas of federal undertaking. MHC will review and nominate to the National Register significant historic



properties at the request of federal agencies; MHC estimates two federal nominations in FY82. MHC will supply opinions to federal agencies regarding the National Register eligibility of properties reviewed under the Advisory Council of Historic Preservation procedures. MHC expects approximately 100 requests for SHPO opinion for determinations of eligibility in FY82. A key support activity will be revision and distribution of National Register application forms and manuals, and the reprinting of the "There's a Difference" brochure.

#### PROTECTION

GMR #4  
GMR #5a

During FY82 MHC needs to advise and assist local, state and federal agencies in carrying out their historic and preservation responsibilities and needs to cooperate with public and private organizations to ensure that historic properties are taken into consideration at all levels of planning and development. As the State Historic Preservation Office, the MHC is in a key position to effectively use the preservation tools available to protect historic properties. MHC intends to provide technical assistance to individuals, to sub-grantees and to local public and private organizations regarding the physical preservation of historic and archeological properties. During FY82, MHC will prepare technical brochures and information on pressing preservation problems in Massachusetts including: grave-stone and cemetery maintenance, downtown storefront rehabilitation standards and examples of industrial re-use.

GMR #5a

MHC also intends to pursue the recommendations outlined in the State Preservation Plan and follow the proposals of the Advisory Council for Historic Preservation to cooperate with critical planning agencies in developing appropriate state components of programmatic memoranda of agreement. MHC will work with the Massachusetts Department of Public Works (Federal Highway Administration), Department of Environmental Quality Engineering (Environmental Protection Agency), and the Massachusetts Housing Finance Agency/Executive Office of Communities and Development (HUD) in developing strong agency preservation plans and procedures in order to reduce time and energy spent in project by project review. MHC will continue cooperation with the National Park Service under the existing programmatic memorandum. In addition, MHC plans to continue to review and advise agencies regarding the potential impacts of proposed undertakings to historic properties in accordance with the Advisory Council for Historic Preservation and Massachusetts Environmental Protection Act procedures.

GMR #5b

MHC will review and comment on A-95 notices, Environmental Notification Forms, Army Corps permits, FERC notices and other review inquiries; and MHC will participate in the consultation process outlined in 36 CFR 800 and the Massachusetts State Environmental Protection Agency review process. In addition, MHC plans to review and comment on the revised ACHP procedures when published, and will adjust internal review procedures to correspond with the new regulations when promulgated. Accordingly, MHC will revise and distribute its popular Public Planning and Environmental Review: Archeology and Historic Preservation as an important support activity.

GMR #4

GMR #5

GMR #2B

During FY82, MHC intends to strengthen working relationships with the private sector in order to encourage private preservation efforts. MHC will review and comment on plans and specifications for rehabilitation projects under the provisions of the Tax Reform Act as amended and the Economic Recovery Act of 1981. It will be essential to revise and distribute the tax act brochure, and to participate in workshops on this topic. MHC will cooperate with private developers in salvaging significant archaeological properties prior to privately sponsored construction projects. In this regard, MHC will continue the Shattuck Farm Project and will initiate a salvage of a 17th century archaeological site in Boston in conjunction with a hotel development. During FY82 MHC will cooperate with developers to protect other threatened sites and may support surveys to identify sites through S&P grants. MHC also intends to encourage downtown revitalization efforts which focus on historic town centers. MHC will cooperate with the Executive Office of Communities and Development in developing guidelines for historic downtown revitalization and will continue donating technical expertise to the Massachusetts Main Street project.

GMR #6

GMR #5

During FY82 MHC needs to monitor 37 pre-1982 A&D grants projects. MHC will conduct site visits and review documentation to ensure technical and financial compliance to the terms of the A&D contract. In addition, MHC intends to develop an appropriate procedure which ensures that the preservation restrictions held by MHC are useful preservation tools. MHC will monitor existing preservation restrictions (256 covenants resulting from past A&D grants and Massachusetts Historic Landmark designations) and enforce the terms and conditions outlined in the restriction.

Several key MHC activities in 1982 are essential to the realization of our major survey, evaluation, and protection goals. These include the preparation and distribution of a quarterly Newsletter, quarterly updates on policies for the 315 local historical commissions, recognition of exemplary preservation efforts through MHC's annual preservation awards programs, and responding to general inquiries for technical assistance. Each is an important information and educational tool in support of our major program elements. These key supporting activities are listed on Attachment A page 7 following GMR #8, and pertain to all eight Grantee Minimum Requirements.

In conclusion, MHC believes that the objectives and supporting activities described above constitute the minimum requirements necessary to comply with the responsibilities of the SHPO outlined in the 1980 Amendments to the National Historic Preservation Act.









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## FY 82 PROGRAM OVERVIEW

### FY 81 ACCOMPLISHMENTS

In the early years of the state historic preservation program, New Hampshire lacked sufficient financial resources, local interest, and professional skills to conduct a comprehensive statewide cultural resources survey and planning process which could produce reliable data and preservation strategies. Single-site National Register nominations prepared by individuals or historical organizations were the norm, although some did engender small-scale surveys for incorporation into district nominations and/or local historic districts.

Since 1980, Historic Preservation Fund-assisted subgrantee survey, registration and protection activities have focused public attention on the state's preservation program; the contribution of preservation to community conservation and development is being widely recognized; federal, state, regional, and local planning agencies are becoming--through "Survey and Planning" projects and the Section 106 review system--partners with the NHSHPO to incorporate cultural resources into the planning process; new funding sources for preservation-related projects have materialized; a corps of experienced professionals and trained volunteers is developing within the state; state legislation has expanded the functions and responsibilities of the Historic Preservation Office; and, each subgrantee survey project is expanding the State Survey Data on file with NHSHPO.

In New Hampshire, surveys and preservation planning are perceived not as an end, but as a means: a method for communities to identify, evaluate, and protect or manage--for optimum benefits--their archaeological, architectural, historical and cultural resources. The 17 state priorities for allocating Historic Preservation Fund grants-in-aid (see FY81 report, pages A-10 and A-11) are assigned equal rank, thus giving higher scores to projects incorporating the widest spectra of survey, registration and protection activities.

Similarly, protection activities are considered to be dynamic and capable of generating other survey and registration efforts--all of which are incorporated into the statewide cultural resources management model.

The major event affecting the state preservation program in FY81 was the enactment of a consensus draft, prepared by the SHPO Archaeologist, of a comprehensive state antiquities program (addressing architectural and historical as well as archaeological resources). The law took effect August 28, 1981, as Chapter 504, Laws of 1981. It defines "historic resources;" establishes state ownership of all such resources recovered from state-owned lands, or waters under state jurisdiction; defines a management system for historic resources; and creates the position of State Archaeologist within the State Historic Preservation Office; it also establishes a formal program of certification for avocational archaeologists. Other legislation which became law in 1981 included the termination of the State Historical Commission (the agency administering the



state's historical marker program) and its reconstitution as the State Historical Marker Review Council, to be affiliated with the State Historic Preservation Office. Funding for the continuing preservation work at the Upham-Walker House in Concord, for the preservation of the Rhododendron Cottage in Fitzwilliam as part of the state park system, and for the rehabilitation of Monadnock Mill Number One in Claremont as a regional social services center and state office building--a direct result of the 1978 HAER/TPS "Rehab Action Project" in Claremont--was included in the state's FY82-83 Capital Budget. The NHSHPD will cooperate with other state agencies in the implementation of all three projects.

The primary emphasis of survey activity during FY81 was the continued coordination of private, governmental and academic planning, research, and development activities as the core of an integrated and effective statewide survey program. S&P grants to regional planning commissions and to communities for local cultural resources surveys--complementary to municipal and regional comprehensive plans--were an important component of this activity. In addition, properities, districts and areas brought to the attention of the Preservation Office by suggestions from the public, requests of government officials, inquiries from preservation organizations, or as a result of the review process, were continuously added to the statewide inventory and planning model.

The architectural component inventory form and field strategy was tested and refined by the Strafford-Rockingham Regional Council and NHSHPD; as part of the testing process, several training workshops were held in cooperation with other regional planning commissions for local survey staff and volunteers. The inventory format will be adapted for computer-assisted management after the automated National Register data system is available from NPS. Computer-assisted data management for the prehistoric and historic sites archaeological component of the survey was operational in FY81 until anticipated contracts with universities and educational institutions could not be undertaken, due to an audit impasse. The survey results reflect these differing levels of activity: reduced numbers of archaeological sites surveyed, but an increase in the numbers of architectural/historical properties added to the inventory, due to: increasing public interest in potential National Register listing, protection, and investment benefits; positive public response to proposed downtown (CBD) National Register inventories and nomination; the wider availability of professionals; and the increasing expertise and efficiency of local volunteers involved in community and regional historical surveys. The most positive development for archaeological survey was the certification of 47 avocational archaeologists, in addition to the 83 previously qualified, for a total of 130 statewide. The 1981 UNH Field School provided a means for already-certified avocationalists to advance their skills levels, and to develop a pool from which additional avocationalists will be certified.

The increasing popularity of the Tax Reform Act financial incentives for building rehabilitation, combined with the growing statewide concern over loss of agricultural land, erosion of downtown business districts, and proliferation of strip commercial & residential development, all brought new attention to the NHSHPD programs and services, and gained new constituencies for preservation activities in New Hampshire: particularly among private investors, local governments, and community organizations involved in downtown revitalization projects. By September 1981, approximately 25 "Tax Act" rehab projects were underway, generating an estimated \$30 million in private capital, and leveraging additional public funds to revitalize commercial, industrial, resort and multi-unit residential buildings listed or nominated to the National Register.

The tax incentives have also encouraged a broader public level of support for National Register nomination activities (contrary to the experience of some other states), and have engendered increased individual and local initiatives for seeking National Register designation. Significantly, the tax incentives have focused greater attention on the NHSHP0 program, and have become the basis for cooperative efforts with the NH Association of Realtors and the NH Chapter, AIA, to publicize the Tax Act standards and procedures.

Cooperation with NHAIA developed in other areas, as well. In March and April 1981 the NHAIA, Amoskeag Neighborhood Association, Currier Gallery of Art, Manchester Historic Association, and NHSHP0--with the assistance of a NEA grant--participated in a joint program centered on the SITES traveling exhibit, "A Gift to the Street." Activities during the 6-week period include a panel on "Pro & Con of the National Register;" a festival of Victorian architecture, including a building maintenance clinic and guided bus tours of Victorian neighborhoods; a variety of school programs and teacher training workshops; a symposium of municipal code officials, state safety and building officials, members of the NHAIA and a representative from NHSHP0, to discuss rehab and code compliance issues; an energy conservation workshop co-sponsored by the Governor's Council on Energy and the state's largest electrical utility, Public Service Co. of NH; the formal public presentation of the Vision, Inc., street-scape plan prepared for the Amoskeag Historic District; and extensive state and local press and air media coverage, plus a Tax Act presentation to the Rotary.

In FY81, the NHSHP0 "Consultant Services Program" was expanded; the \$500. maximum grants were used by nonprofit organizations, regional planning commissions, and municipalities to obtain specialized professional services in architecture and engineering. Two of the \$500. grants were especially cost-effective: they resulted in the rehabilitation of two historic metal bridges at a combined cost of approximately \$40,000.--and saving an estimated half million dollars that new replacement structures would have cost.

Other FY81 protection activities included the continuing liaison with the Governor's Commission for the Handicapped, the initiation of a NAER recording project for the Concord Gas Co.'s gasometer (to be documented in summer 1982 with the assistance of the Northern New England Chapter, SIA), and the initiation of Phase V of the NAER-quality Historical Survey of Canterbury Shaker Village documentation/comprehensive preservation planning project. The NHSHP0 was directly involved with a total of 11 model downtown central business district/<sup>projects</sup> that integrate survey, registration and protection activities. A particularly important event in FY81 was the Department of Public Works & Highway's initiation of a statewide Historic Bridges Inventory, to be performed in two phases, and carried out in cooperation with the NHSHP0.

Despite reductions in federal funding for projects which could affect cultural resources, the review/compliance caseload increased both in numbers and in complexity during FY81.

In FY81, Preservation: An Ethic for Planning, published by the NH Charitable Fund for the NHSHP0, was completed; combined with Historic Districts in NH: A Handbook for the Establishment and Administration of Historic Districts (refer to FY80 progress report), it was distributed to local officials, libraries, federal/state/regional/local planning and preservation agencies, preservation/conservation/planning organizations, and the public. In addition, NHSHP0 published and distributed other preservation-related materials; provided information to individuals, organizations, state and federal agencies, the press and radio; participated in preservation and planning programs,

workshops, training courses, field schools, exhibits, tours, and resource fairs; it co-sponsored courses open to the public, and cooperated with local sponsors in the annual observance of "National Historic Preservation Week" throughout the state, in order to address the variety of public issues related to the survey, registration, and protection of New Hampshire's heritage resources.

Other major advances in FY81 were an increased ability to provide specialized technical services, and the strengthening of NHSPO's integration with private, municipal, regional and state initiatives--both public and private--in planning, preservation, and resource management.

## PROBLEMS AND NEEDS

The primary problem of cultural resource protection in New Hampshire is the acceleration of attrition and destruction caused by explosive population growth. This growth can be attributed to a paradox: New Hampshire still retains a cultural landscape of such beauty, quality, and integrity that an ever-increasing number of people want to be part of it, but the services needed to accommodate this increase inevitably disrupt the attractiveness, value, and often the viability of the historic fabric.

The 1970-1980 decennial U.S. census results show that New Hampshire's population grew at a rate of 24+ % for the decade: first in New England, second only to Florida in states east of the Mississippi, and 11th nationwide.

The challenge facing New Hampshire and its preservation program is to identify, record, evaluate, and protect the state's historic resources before they are swept away forever.

New Hampshire's survey program element is organized in ways which meet the objectives of the national Historic Preservation Fund program, but which is structured and implemented in ways which reflect organizational, philosophical, and practical (including fiscal) issues in the state.

Formally initiated in FY80, the survey program requires definition of survey units by research objectives and planning goals, provides for the active involvement of non-professionals for support and cost-effectiveness, and stresses multi-disciplinary surveys and/or coordination by NHSPO of multiple uni-resource surveys for a unit. Survey units are defined by environmental variables (of which the largest units correspond to hydrographic regions), historical and contemporary growth patterns, governmental and planning units, and growth and development projections. Therefore, survey units combine research and management variables, which facilitates the development of protective plans as resources are identified.

New Hampshire's comprehensive historic preservation planning process recognizes all federal and federally-assisted state, regional, local and private agencies and organizations whose activities may affect cultural resources (both above and below ground) as critical agencies. The basic relationship of NHSPO to these agencies is mandated by federal and state statutes, both for implementing legal requirements, and for performing a managerial role of planning, organizing, directing and controlling or coordinating available professional, technical, and financial resources--both public and private--to meet individual, community, and state interest and needs. Thus the NHSPO is a pivotal agency in the interpretation and implementation of federal historic preservation policy and procedures, and it is also a key agency in state planning and resource management. The challenge to the NHSPO is to establish, monitor and maintain an effective program for comprehensive assistance to critical agencies to effect these mandates.



Comprehensive assistance is defined as an open-ended list of planning, informational, and technical services provided by NHSHP0: both in response to specific desires and needs of critical agencies, and to preservation objectives established by NPS and NHSHP0. The degree of criticality and the types of assistance are determined by a matrix of variables, including the relationship of the NHSHP0 cultural resources inventory to other planning activities. Assistance to critical agencies is organized by NHSHP0 units of program responsibility (National Register, etc.) and each unit is coordinated by a member of the NHSHP0 professional staff. Assistance is rendered by NHSHP0 staff and/or professional consultants under cooperative services agreements, subgrants, and/or the "Consultant Services Program."

The small staff and limited budget of NHSHP0 make a virtue of necessity: because NHSHP0 functions are primarily in administration rather than operations, public education and training for participation in the state preservation program is essential if New Hampshire is to fulfill the HPF program requirements, state program priorities, and the state-mandated responsibilities of the NHSHP0. However, communities and individuals cannot benefit from services, nor can they participate in programs, of which they are not aware. Thus, NHSHP0 is committed to an active program of public information, education, and technical assistance--because preservation will become a reality only when the public recognizes and respects the value of its cultural inheritance, and takes responsibility for sympathetic stewardship of these resources. Immediate and convenient access by the public to the best-available information and technology is therefore crucial to the success of New Hampshire's state preservation program.

To encourage public participation in preservation activities, the NHSHP0 acts as a resource center for preservation-related information and assistance; it distributes technical literature, suggests referrals, provides demonstrations, workshops, seminars, conferences, courses, films and tours open to the public. Opportunities to affiliate with other organizations and agencies, in projects or programs addressing mutual concerns, are welcomed. An active program of grants for local small-scale Survey, and Planning projects is emphasized. Participation with other professional, avocational, recreational, academic, conservation and preservation interest groups is developing even closer linkages between the public and NHSHP0 in the survey, registration, and protection of New Hampshire's cultural resources. The NHSHP0 also co-sponsors a quarterly Northern New England Chapter/SIA newsletter, and a NHSHP0 staff member helped to organize--and now serves as an officer--of the New Hampshire Coordinating Committee for the Promotion of History.

The Annual Work Program is based upon proposals requested from the public; accordingly, it represents the stated concerns, needs, desires and goals of the New Hampshire public for preservation information, training, surveys, and preservation planning and management activities; it also represents the NHSHP0's action plan to assist the public in meeting these requests. Although participation of minorities and the handicapped in the NHSHP0 program is a priority (see FY81 Work Program, "Participation of Minorities and the Handicapped"), the most effective means to insure that program benefits accrue to both groups has proved to be the support of broad-scope preservation activities sponsored by non-profit and governmental agencies.

Ironically, one of the greatest difficulties faced by NHSHP0 in FY81 was in attempting to respond to the ever-increasing public interest in, and demand for, programs and services which are mandated by federal and state law but which are insufficiently staffed and budgeted at both the federal and state levels.



The major problem NHSHP0 experienced in FY81 resulted from the apparent incompatibility of university grant accounting systems with Department of the Interior grants administration requirements. Much time and effort was spent in trying to resolve the financial management issues involving university-sponsored grant projects; following the biennial DOI audit of the NHSHP0 program, all outstanding contracts with universities were suspended and proposed contracts were deferred until the issues could be resolved. It is anticipated that the impasse cannot be resolved until March 1982, at the earliest.

As a result, the cooperative services agreement renewal with the University of New Hampshire was not implemented, and anticipated archaeological survey, registration, and technical assistance activities had to be postponed. Access by NHSHP0 to the automated survey data was restricted, and technical/professional consulting services to subgrantees and the public were curtailed. The planned survey and inventory of railroad-related structures, co-sponsored by Plymouth State College, was rescheduled, and planned training programs in archaeological survey and resource protection planning were cancelled. Only by developing an alternate source of non-federal matching share (documented donated services and non-personnel-related cash expenditures, in accordance with strict conditions), was it possible to offer the summer 1981 Field School in archaeological survey, in the Merrimack River Valley north of Concord. Further contracts with the University of New Hampshire and other educational institutions depend on whether current audit and documentation problems are resolved.

A second major problem, shared with other SHPO programs nationwide, was the closing of the National Register to privately-owned properties at the end of 1980 and the uncertainty about when it may be reopened. In FY81, the New Hampshire State Historic Preservation Review Board approved 28 individual and 2 district nominations; 2 were tabled, 1 withdrawn for revision, and 3 were pending at the end of the year. In addition, 9 were ready for consideration at the first meeting of FY82 and 14 renominations are ready to be resubmitted to the National Register with additional information. Of the 30 nominations approved in FY81, only 12 could be submitted to the Register; 18 are ready for immediate submission when the Register is re-opened. The questions about scheduling and listing of privately-owned properties are beginning to discourage property owners and investors; several are considering withdrawing their nominations. In addition, the impossibility of nominating a structure so that it can qualify for the new ERTA 25% tax credit (nomination being considered by investors as "more certain" than preliminary certification of significance), will likely cause investors to choose the lesser ERTA credits, which do not require that work be performed in accordance with the Secretary of the Interior's Standards for Rehabilitation. It may also cause communities to reconsider their support for downtown National Register districts, since the disincentives apply whether or not a property qualifies for the new 25% tax credit.

The third, and potentially most difficult problem, is the reduction in staffing and budget for NHSHP0. One of the 3 support staff members was laid off in July 1981; the office budget was reduced slightly in FY81, but the FY82 state operating budget reduces program funds by almost 50%. Unless some of the lost amounts can be made up through the new 70/30 matching ratio, or by donated cash, services, space and equipment from non-state-budgetary sources, the federally-mandated functions of the State Historic Preservation Office will have to be curtailed in early calendar 1982--since the NHSHP0 is operating now at the minimum certifiable staffing level of three professionals in the required disciplines of archaeology, architectural history and history. Current NHSHP0 staff members must bear additional responsibilities, and must work additional hours without remuneration, added benefits, or any other tangible compensation.

Furthermore--because the in-house positions most directly related to daily grants management have never been filled--financial and performance monitoring, and coordination with the Department of Resources and Economic Development's Business Office (which has primary responsibility for the financial aspects of grants management) cannot be performed to the standards which NHSHP0 desires to achieve.

#### PROPOSED FY 82 ACTIVITIES

The problems and need outlined above have been central to the development of the FY82 Work Program planned activities. To paraphrase the goals enunciated by Congress in PL 96-515, New Hampshire will concentrate FY82 efforts on:

- the survey of non-federal land projected for intensive development, as well as those areas that may contain potential National Historic Landmarks; and

- the enhancement of local (including both governmental and private) capabilities to identify, evaluate, and protect cultural resources in order to promote the preservation of historic properties as an important consideration in community development.

Activities considered essential to addressing these needs are specified in the "FY 82 Attachment A," appended. In addition, NHSHP0 will use unobligated FY81 funds (formerly reserved for university-sponsored survey and technical assistance programs) for the following project categories:

- emergency and special projects;

- consultant services/visiting specialists mini-grants;

- preservation education and training programs, and activities;

- historic structures reports, feasibility studies, architectural/engineering plans and specifications, for eligible historic properties; and

- a coordinated, multi-faceted farmland and historic properties protection program, to correlate survey/inventory/preservation planning activities with tax incentives for conservation and preservation as enunciated by the Tax Treatments Extension Act of 1980.

If it should become possible to reprogram available FY81 S&P funds into the A&D component, 9 projects (incorporating up to 12 properties) have been assigned priority.

A principal concern in FY82 will be increased and more effective correlation with the broadest possible spectrum of governmental, non-profit and business entities, in addition to concerned professionals, avocational volunteers, and the general public, in order to maximize available sources of non-federal matching share--concurrent with fostering wider participation in NHSHP0 programs and activities--for the New Hampshire State Historic Preservation program. Thus, whatever the future of Preservation Office, the preservation ethic will continue to inform and inspire individual, local, and state policy and planning.









## WORK PLAN OVERVIEW

New Jersey's 1981 AchievementsSurvey

Listing of properties in New Jersey's Historic Sites Inventory nearly tripled in 1981 (3,665 individually listed in 1980; 10,025 individually listed in 1981) as a result of increase in New Jersey's 1980 survey and planning funds. In addition, two major survey projects (Upper Raritan Watershed and Egg Harbor Watershed) included both historic archeological and architectural resources--the first two professional surveys in New Jersey to have included both categories of resources. The Egg Harbor survey included a multiple resource nomination of Marshallville, New Jersey's first multiple resource to come out of a survey and include both historic archeological and architectural properties. Two surveys, a thematic survey of railroad stations and the Egg Harbor survey, also incorporated an evaluation system for ranking resources. The railroad survey evolved into a 2-part ranking system for all 115 stations. The first part included elements to determine register eligibility (the survey will result in a thematic National Register nomination of approximately 70 stations) and the second part included information on condition and suitability for adaptive use to facilitate Section 106 and State Register reviews. The ranking system is backed up by in-depth description and analysis; an 11 page survey form was developed for the project. The survey also included a critique of the evaluation system which will be used in the development of evaluation systems in future surveys and National Register nominations.

National Register

Survey generated nominations which usually provide better contextual evaluation of resources have increased from less than 10% passed by the State Review Committee in 1979 and 1980 to 24% passed in 1981. An additional 13% were survey-assisted. The reorganization and priority system for processing National Register nominations developed at the end of FY 1980 were put into effect in FY 1981. While the SHPO still relied heavily on locally-prepared nominations, the reorganization has given this office a greater voice in selecting and processing nominations in accordance with State priorities. This has resulted in a greater variety of types of resources; a reduction in the number of marginal properties and over-represented types of properties; and improved descriptions, significance statements and boundary justifications.

Data Organization - Retrieval

All State and National Register materials were reorganized during FY 1981. Files were arranged in a consistent manner, and photographs, slides and maps were labeled. Register reorganization

sheets recorded missing or incomplete materials, and cross referenced historic preservation grants, tax act applications, State Register encroachments and Section 106 reviews. The office began a program of replacing missing materials. A college photography call began providing replacement photographs and will continue this project through FY 1982.

#### Public Information and Education

Under a Phase II survey and planning grant to the County and Municipal Government Study Commission, a State Historic Preservation Handbook was prepared. This year's effort included a new questionnaire, 25 site visits, 55 community interviews, 15 State agency interviews, and contacts with 12 other states. The handbook defines historic preservation in its broadest sense, outlines the legal, administrative and community framework within which it functions, and discusses tools and techniques (incorporating New Jersey case studies) for achieving historic preservation goals. Statewide enabling legislation and model local ordinances (two areas identified through questionnaires and interviews of considerable concern) were also prepared as part of the project. The Handbook and related policy document will be published in FY 1982.

#### Tax Act

In FY 1981, the SHPO processed some 50 tax act certifications (both Parts 1 and 2), made 18 site inspections to discuss individual projects with owners/developers contemplating certification, and daily spoke with the public regarding tax benefits for rehabilitation of historic properties. This represents an increase of more than four fold over such requests in FY 1980. Projects range from three-family town houses in Jersey City and suburban Plainfield dwellings to Paterson and Trenton mill conversions. Increasingly we have tried to identify potential tax act projects concurrently under 106 review in order to expedite each process and improve consistency of review.

#### New Jersey's 1982 Program

##### Survey

As New Jersey's survey program remains dependent on the willingness of local governments and organizations to co-sponsor and provide the matching share for survey and planning grant funded surveys, the problem of encouraging projects in some areas remains (especially in northwest and southwest New Jersey where there exists important 18th and 19th century rural resources). A greater effort will be made to reach these areas. In addition to standard surveys, we will attempt to undertake the following special survey projects:

1. Model rural survey incorporating landscape assessment and/or agricultural district Register nomination (projected FY 82 funds);
2. Main Street survey and preservation plan, including store-front rehabilitation design and guidelines (projected FY 82 funds);
3. Selective thematic surveys -
  - a) survey of glass factories, an important early New Jersey industry (FY 1981 to be completed during FY 1982);
  - b) Statewide survey of Black historical sites (projected FY 82 funds);
  - c) public buildings survey beginning with public schools (projected FY 82 funds).

Several 106 reviews in the past year involved older schools. As this is seen as a continually threatened type of resource across the State as a result of population changes, and one which represents a building type often difficult to assess with regard to register eligibility based on existing survey data, we will attempt to conceptualize and fund a thematic school survey during FY 82. This survey and/or preservation plan will be useful in tax act as well as 106 reviews.

#### Registration

In 1982 the SHPO anticipates survey-generated nominations (FY 81 funded) will account for 35% of nominations presented to the State Review Committee. Included are 15 survey-generated historic districts and 2 survey-generated thematics - active railroad stations and East Orange churches.

We will continue our efforts to upgrade publically prepared nominations. The priority processing system as well as more stringent staff review will be refined as necessary.

New Jersey will be using 70/30 funds in a fairly limited way this first year. As some of the current staff are eligible for 70/30 match, we will attempt to hire two new professionals to work on survey, registration and public information. The new staff will begin a program of intensive technical assistance in selected areas where there has been no professional survey. This will include organization and close monitoring of local volunteer surveys and preparation and review of National Register historic districts. This new program is intended to complement the professional grant-generated survey program and to provide badly needed staff for the National Register program (professional National Register staff decreased from 2 persons to 1 since 1979).



## Public Information and Education/State Plan

FY 1981 survey and planning funds were used to co-sponsor with Preservation New Jersey, the statewide private historic preservation organization, a Preservation Caucus and Newsletter. The October 17, 1981 Caucus, with sessions on Financing, Legislation, Design Issues, and Building a Preservation Constituency will be a working session to assess New Jersey's historic preservation needs and develop a blueprint for action. The Newsletter, an unrealized objective since 1979, will include a special section on SHPO news as well as general items of preservation interest. Five issues are scheduled for 1982.

Phase I of the State Plan for Archeology will be published and distributed during 1982. A workshop for the archeological community to review the document and make recommendations for Phase II is anticipated. Phase I of a State Plan for Historic/Architectural Resources will be developed during 1982. It will include (1) a public participation component through the Preservation Caucus and re-analysis of community questionnaires and interviews; (2) an assessment of inventory and register listings in terms of location and categories of significance; and (3) an outline of historic/architectural development of the State. The goal is to develop a State Plan for Cultural Resources in 1983.

While the Newsletter will be issue oriented, dealing with public policy and disseminating technical information, more in-depth information on New Jersey's cultural resources is also needed. Survey and register data is available both at OCES and on the local level, but there has been little attempt to synthesize the material and present it in a more appropriate format for public consumption. We will attempt to fund (FY 82 monies) a guide or series of guides to New Jersey's cultural properties. Focusing primarily on Register properties, the publications would include photographs, maps, description and significance.

## Review and Compliance

The SHPO still does not receive adequate material from some federal agencies for Section 106 reviews. CDBG communities remain a problem. We will attempt to develop a CDBG Handbook outlining 106 responsibilities as well as developing programmatic MOA's with selected CDBG communities. We will also assess the State Register review process and recommend changes where needed.

It is hoped that an office reorganization proposed in 1981, now scheduled for 1982, will enable the SHPO to hire another staff person for 106 reviews.

New York



PROGRAM OVERVIEW STATEMENTPart I: Description of Major Accomplishments  
and Initiatives for FY82

On September 2, 1980, the State Historic Preservation Officer (SHPO) submitted a paper to the Office of the Governor of the State of New York which outlined a program of major issues to be faced in the coming year. As pointed out by the SHPO, historic preservation has become a program of major economic importance to the state, largely through the impetus of federal grants and federal tax incentives. Preservation has become a major component in urban redevelopment and reinvestment plans, thereby increasing local tax bases and property values as well as protecting the irreplaceable treasures of our past. With the enactment of the State Historic Preservation Act of 1980 (Chapter 354 of the Laws of 1980) and the National Historic Preservation Act Amendments of 1980, the SHPO has now assumed new and expanded state and federal historic preservation responsibilities.

In the coming year, the SHPO will focus on developing the expanded federal and state historic preservation programs to the fullest extent possible. Emphasis will be placed on developing liaison and education programs with municipalities, as required by the new federal legislation. Major initiatives to be undertaken include:

- Integration of new state register procedures with the existing National Register procedures and the continued expansion of the registers

In FY81, regulations for the New York State Register of Historic Places were adopted in accordance with the State Historic Preservation Act of 1980. The SHPO now has the authority to review and approve nominations to the State Register. The State Register complements, and is consistent with, the National Register in that identical criteria and procedures are followed. Nominations will be processed simultaneously for the State Register and the National Register, and there will be consistency between federal and state project review procedures. Our goal is to provide increasingly reliable, prompt, and consistent data for use in the preservation planning process.

- Substantial augmentation and eventual completion of the statewide inventory of historic resources -

As demonstrated in the FY81 Progress Report, the number of historic properties identified and recorded in the statewide inventory has been substantially increased through use of the federal survey and planning grant-in-aid program. A companion program has been planned to upgrade the inventory data. A project to computerize the inventory is planned in order to facilitate Section 106 compliance and increase the effectiveness of the inventory as a planning tool for federal, state, and local agencies.



Instituting procedures for the review of state agency actions affecting historic resources (required by provisions of the State Historic Preservation Act) will complement the protection provided by the Advisory Council procedures governing federal agency actions. -

In FY81, regulations for review of state agency actions were adopted and actual review of projects has commenced. At present, a total of eighty state agencies, boards, and commissions have appointed Agency Preservation Officers.

- Expanding programs for informing and assisting local officials in matters relating to historic preservation is called for by the 1980 National Historic Preservation Act Amendments - This mandate is largely unfulfilled to date. However, a major initiative in FY82 will be to develop a municipal program to help local governments achieve certification in order to participate more fully in federal and state historic preservation programs. The SHPO intends to work initially through the various statewide associations of local government officials and, subsequently, with specific communities through direct programs. As an attempt to offset the lack of federal grant assistance, the SHPO intends to emphasize staff technical assistance capabilities to communities in the areas of survey, registration and protection (mainly through technical advice, Tax Act certification, and assistance in securing alternatives to federal funding).

- Encouraging state agencies to preserve and to use significant historic properties under their control

Mandated by Section 4(b) of Chapter 354 of the State Historic Preservation Act, this policy complements the purposes of the federal Public Buildings Cooperative Use Act. Although major initiatives under this program will not be undertaken until FY82, during the past year the SHPO made significant gains in encouraging property-holding federal and state agencies to use and to conserve historic properties under their jurisdictions. Primarily as the result of informational and educational efforts by the SHPO staff, virtually all major state construction and land management agencies have appointed Agency Preservation Officers (APO's), and all of these APO's have attended at least one training session sponsored by the SHPO. The SHPO staff has held meetings with staff of the state Office of General Services and the federal General Services Administration concerning the need to undertake comprehensive survey of state and federally owned properties and to list significant properties on the National and State Registers. Efforts have been made by these agencies to secure leaseholds in registered buildings, and, in rehabilitation projects involving historic structures, the state's OGS has agreed to follow the Secretary of the Interior's "Standards."

Part II: An Assessment of Accomplishments, Problems and Needs in each of the three program elements: Survey, Registration, and Protection

I. Survey Element

A. Accomplishments

1. Development of an accelerated inventory process: Beginning in FY77, the SHPO began to award competitive federal survey and planning grants to qualified local governments and preservationists for the purpose of surveying and inventorying historic properties. By the end of FY81, the survey and planning grant program had resulted in the addition of 45,000 sites to the inventory. Comprehensive inventories have enabled the SHPO to develop multiple resource nominations for the National Register which has led to more wide-spread use of protection mechanisms for significant cultural resources. Also, comprehensive inventories have been used successfully by local constituents to gain public interest and support for all areas of preservation activity.
2. Upgrading entries in the statewide inventory: The inventory has been reviewed to ensure a consistently high degree of accuracy. Much of the data that had been collected by volunteer efforts prior to initiation of federally funded survey and planning projects has been edited and verified in preparation for computerization.
3. Increased efforts to stimulate and assist local government agencies to undertake surveys as required by federal legislation: Through an aggressive "outreach" field program, the SHPO staff is in daily contact with local government officials in an effort to guide survey projects and to ensure that such projects are initiated in areas where there is a threat to resources.
4. Drafting and promulgation of state regulations formally adopting the statewide inventory as a planning tool and recognizing it as the first step in the process of listing on the National and State Registers: Regulations were adopted by the state in FY81 to fulfill mandates of the State Historic Preservation Act to 1) develop a State Register based upon federal criteria and standards and 2) establish procedures for review of state agency undertakings affecting any inventoried property. These procedures parallel and complement federal procedures established under Section 106.
5. Increased monitoring of federal survey and planning grants to ensure that surveys are consistent with DOI and SHPO standards.
6. For the first time since the inception of this program, the SHPO conducted a statistical analysis of the statewide inventory and a qualitative evaluation of entries.
7. Planning and preparation for computerized access (in FY82) to the statewide inventory in order to increase its effectiveness as a planning tool for federal, state, and local agencies.

8. Redirection of survey/inventory efforts consistent with National and State Register priorities (see Progress Report Objective 29), so that the logical progression from survey to registration is maintained.
9. Archeology: A major effort to incorporate data concerning archeological resources held by the State Education Department was made in FY81, resulting in centralization of the archeological data necessary for federal and state planning, registration, and protection purposes.
10. Accelerated integration of cultural resource report data into the State Archeological Inventory using survey and planning grants money.

B. Problems and Needs

1. The accelerated inventory effort has been suspended as a result of the reduction in the federal historic preservation fund allocation. The SHPO will need to find ways to mitigate the profound impact of the reduction in federal support for efforts to complete the statewide inventory. State and local governments and private sources must be persuaded to support and sustain the inventory effort to its completion.
2. The consolidation and upgrading of inventory data in preparation for computerization must be continued. However, with reduced funds this effort may be reduced or even postponed, resulting in the SHPO's inability to furnish accessible, comprehensive, and reliable data for federal, state, and local use.
3. The SHPO needs to increase technical assistance and outreach program to local governments involved in survey/inventory efforts and to emphasize the importance of a well-prepared, comprehensive inventory in the local, state, and federal planning process. With the decrease in funding, the SHPO may not have the staff or the support funds necessary to sustain, let alone increase, technical assistance to local governments.
4. FY82 will be the first year for implementation of state regulations based upon statutory requirements that all state-owned properties be inventoried and evaluated for historic significance. Parallel efforts have been underway for the past several years under the mandate of federal Executive Order 11593. The development of this inventory will be severely limited by the reduction in state and federal funds allocated for this purpose. The SHPO will continue to initiate meetings and provide technical assistance to state and federal agencies responsible for undertaking inventories of properties under their jurisdictions.
5. During FY82, the State Historic Preservation Office will maintain the present level of technical review of FY81 federal survey and planning grants to ensure that the best possible product is received and that it is quickly assimilated into the statewide inventory. Lack of survey and planning grant funds sufficient to ensure the prompt and accurate integration of the data will mean that the inventory is less effective as a planning and protection tool.



6. The State Historic Preservation Office intends to maintain current levels of statistical evaluation of our progress toward program goals. This periodic review will support the establishment of priorities and schedules as well as the development of justification for an increased state budget request. Again, staffing limitations will affect the ability to sustain this important program activity.
7. The State Historic Preservation Office intends to computerize the statewide inventory, which includes information on more than 80,000 properties, to allow for greater access by federal, state, and local planning agencies. Regularly updated information will be made available to all interested parties and should ensure that historic resources are an integral part of all planning processes. The retrieval system will also help the SHPO to account for, to evaluate and to use more effectively the vast amount of data on cultural resources that has been collected since inception of the federal survey and planning program in 1969.
8. The State Historic Preservation Office needs to continue to scrutinize closely the relationship between survey, registration and protection efforts to ensure the most effective use of the federal grant, especially in the face of dramatic reductions in the level of federal assistance.
9. The State Historic Preservation Office needs to continue to update the archeological data map regularly. However, reduction in survey grant funds will severely limit this effort.

#### Registration Element

##### 1. Accomplishments

1. Despite the Department of the Interior's suspension of National Register designation procedures (except for publicly owned property) on December 12, 1980, the New York State Historic Preservation Office has continued to develop nomination proposals at an accelerated rate in anticipation of the promulgation of National Register regulations.
2. The development and publication of National Register priorities has helped State Historic Preservation Office staff communicate to local governments and to the public the fact that survey, registration and protection are integrated elements and that preservation is best served by maintaining a logical progression of elements.
3. Through staff efforts in education, the quality and quantity of nominations submitted by local sponsors has generally improved so that, not only are more proposals being developed, but they require less substantive editing by staff.
4. In 1981, the SHPO recommended certification of local historic preservation statutes in five communities, thereby extending the benefits of the federal tax incentives program to properties covered by these statutes. Also during FY81, nearly 100 properties were certified for Tax Act participation.



5. During FY81, the SHPO hosted, in cooperation with local preservationists, numerous ceremonies to recognize properties that had been listed on the National Register. Five major ceremonies were held, attended by more than 1500 property owners, interested officials, and members of the preservation community, at which nearly 200 certificates recognizing National Register status were presented. The educational and publicity value of such ceremonies, which always involve federal, state and local elected officials, should not be underestimated. Informational material developed by Technical Preservation Services is distributed to owners at these ceremonies.

## B. Problems and Needs

1. The absence of National Register regulations has created a major backlog of over 400 nominations at the SHPO level and caused increasing concern among many sponsors.
2. The unavailability of consultant funds for nomination preparation will reduce annual production of National Register nominations by at least two-thirds.
3. In the light of substantially increasing demands upon staff to process nominations and our inability to increase staff, the SHPO will need to make a special effort to ensure that the National Register priorities are adhered to by staff and are understood by the sponsors affected by them.
4. The SHPO staff has learned the value of training a corps of professional consultants to prepare high quality National Register nominations. We intend to continue, as staff time permits, to expand the number of reliable individuals competent to prepare scholarly, technically correct nominations. However, reduction in survey and planning money may mean that the professional corps will diminish or even disappear and we could be left with only dedicated volunteers.
5. Certification of significance of individual properties, districts, and local statutes will continue to be a priority, especially in the absence of National Register regulations. A major problem, however, is that many Tax Act applicants face the expiration of the 30-month grace period for registration; this could cause the program a major embarrassment and a loss of the tax benefits as a major preservation incentive.

## II. Protection Element

### A. Accomplishments

1. Project Review: During the last fiscal year, the SHPO successfully developed regulations for the review of state agency undertakings that may affect historic resources. These regulations fulfill a mandate of the 1980 State Historic Preservation Act and complement the federal "106" process. In the past, there had been state protective legislation only for properties which had been recommended for nomination by the State Review Board or listed on the National Register. Section 14 of Chapter 354 of the state law

provides a consultation process for all actions that may affect any property listed on the statewide inventory. Regulations were issued at the close of the 1981 federal fiscal year, so the volume of review activity is still unknown. The regulations have been received favorably by most state agencies, suggesting a high level of acceptance and cooperation with the state historic preservation program.

Substantial progress was made in assisting the federal and state agencies identified as "critical" in the FY81 Work Program. Detailed accomplishments are described in the FY81 Progress Report.

Encouraging federal and state agencies to use and protect historic buildings under their jurisdictions is a useful preservation tool created by the federal Public Buildings Cooperative Use Act by Article 4(b) and by the New York State Historic Preservation Act of 1980. All of the state's major construction and real property agencies have appointed "Agency Preservation Officers," and all state and federal landholding agencies have participated in discussions with the SHPO staff on conservation techniques, adaptive use, and recording standards. Preliminary discussions have been held with the state's Office of General Services and the federal General Services Administration concerning the need to survey all properties in state ownership and to assess them for National and State Register eligibility.

The certification of proposed/completed rehabilitation for federal Tax Act incentives continues to be among the most effective protective mechanisms. During the past fiscal year, the SHPO reviewed numerous rehabilitations and conducted many on-site consultations with architects and developers to ensure compliance with the Secretary of Interior's "Standards," (statistics are contained in the Progress Report). The effectiveness of the Tax Act program is evidenced by the \$25 million of certified rehabilitation in 1981 alone. To meet this accelerated demand, the SHPO has increased the technical services staff by 1 1/2 persons over the past two years, a 50% increase. This additional staff has not only facilitated increased production, but has provided the SHPO an opportunity to participate regularly in educational workshops with private investors, developers and public officials.

Acquisition and Development Grants: Although federal acquisition and development grants are among the most direct forms of protection that the SHPO can offer, they will cease to exist in New York State as long as the state's apportionment from the federal historic preservation fund remains constant or continues to decline. The ten acquisition and development grants identified in the Progress Report were funded with carry-over FY80 federal funds, and no FY82 money will be assigned to acquisition and development. However, the SHPO continues to monitor ongoing acquisition and development projects to ensure that the consistently high standards of quality that have long been associated with New York's acquisition and development program are sustained.

## B. Problems and Needs

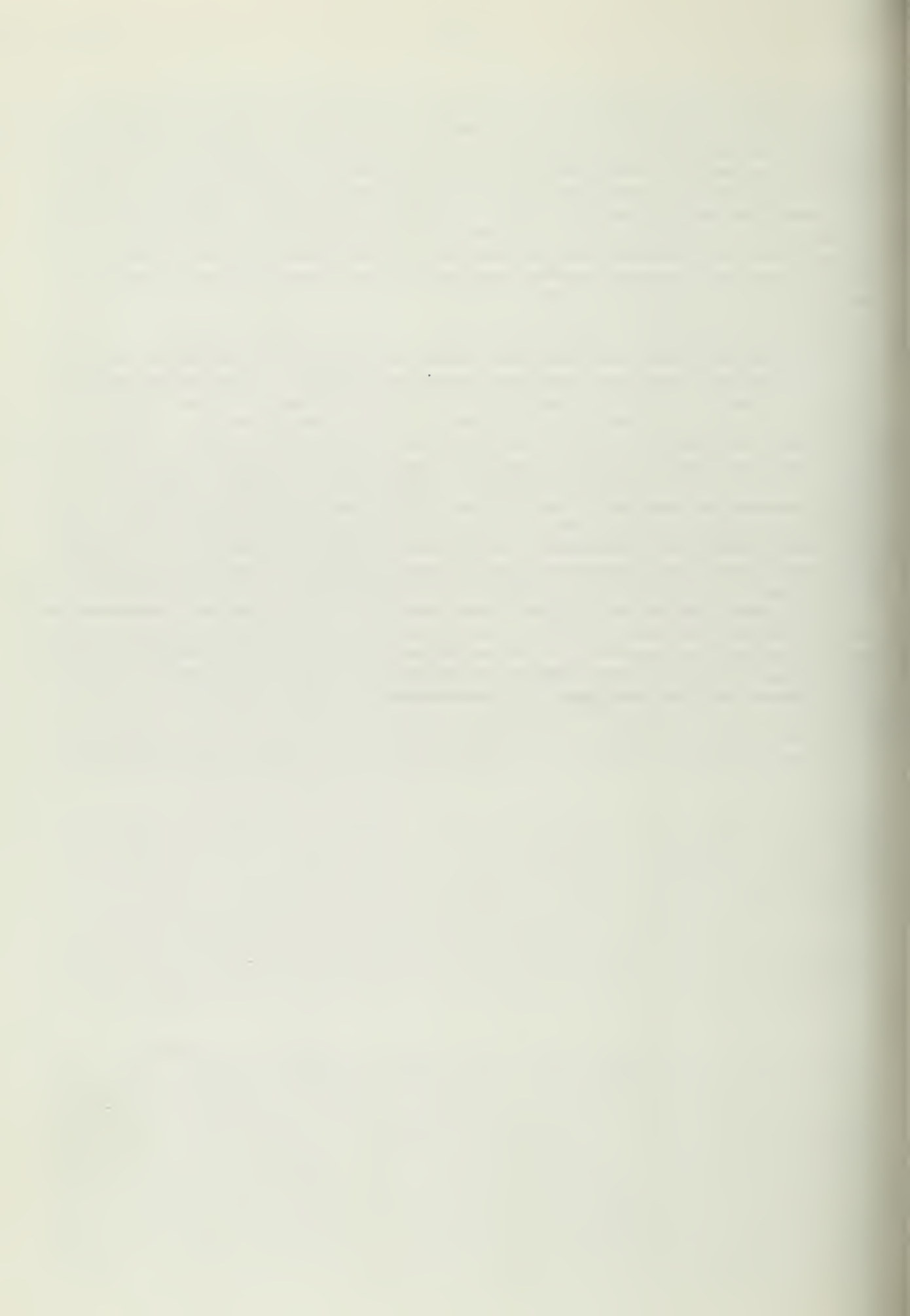
1. Project Review: With the adoption of regulations for review of state agency actions, the accelerated federal UDAG review procedures, and increased FERC license/application review, it will be difficult for the SHPO to maintain the consistently high quality and timeliness of project review responses. Although it is not possible to project the actual increase in review activity as a result of these regulations, federal and state agencies have advised the SHPO that a 100% increase is possible. In addition, the reduced time for review of UDAG projects will place additional responsibility and accountability on the SHPO. Given the funding reduction in FY82, there is no opportunity to increase staff; however, the SHPO has reassigned existing staff to the project review unit.
2. The SHPO will continue to work with the Office of General Services and the GSA in the identification and registration of historic buildings in state and federal ownership. Although a cooperative understanding exists between the OGS and GSA, and the SHPO as to the value and desirability of such a survey, there are very real budget constraints that may make it impossible to begin a comprehensive survey this year. The SHPO will continue to seek federal and state budget allocations for conducting surveys and for nominating significant federal and state owned properties to the National and State Registers. The SHPO needs to continue to monitor OGS and GSA in their applying of the Secretary of Interior's "Standards" to rehabilitation projects involving historic buildings. The SHPO will increase its efforts to inform owners of registered properties of GSA and OGS willingness to give priority to leasing office space in registered structures. In these areas, the SHPO will continue to provide direct staff expertise and on-site assistance to ensure the application of the best preservation technology.
3. The federal Economic Recovery Tax Act of 1981 will surely stimulate an increase in the number of rehabilitations. The SHPO expects that the complexity of rehabilitations will likewise increase. The SHPO is committed to maintaining the highest level of staff assistance and service to individuals and developers who wish to take advantage of the historic preservation provisions of the Tax Act. If necessary, the SHPO is prepared to reassign staff to the Tax Act consultation and certification process to ensure that high quality is maintained and that private investment in historic buildings is maximized.
4. In the absence of federal acquisition and development grants and other more direct forms of protection, the technical staff of the SHPO will increase "outreach" programs to assist developers, municipal officials, historic property owners, and others concerned with the conservation of historic buildings. Such activities are called for under Section 101 of the federal Historic Preservation Act of 1980 and Section 5 of the State Historic Preservation Act. The technical staff can assist in two basic ways: 1) assisting in interpretation and application of the "Standards" in specific projects and 2) serving as a source of information on other funding programs and financial incentives available for preservation projects.



Energy conservation is a major issue in New York State, and one which often comes into conflict with the proper and sensitive rehabilitation of historic buildings. The SHPO's technical staff intends to work closely with developers and individuals to ensure that the highest standards of preservation are considered in energy conservation projects involving historic buildings. The ongoing cooperative relationship with the New York State Energy Office will be maintained, leading to a cooperative research project and a publication on the successful application of energy conservation techniques to old buildings.

Hydro-Electric Facilities Development: During FY81, hydro facilities projects represented a new category of projects which required application of the Section 106 process. The SHPO has worked closely with the New York State Department of Environmental Conservation in reviewing the hydro project submissions. New York State Department of Environmental Conservation has taken a lead role in the licensing application review process and often gives early advice to applicants before they begin to prepare their licensing applications. The SHPO has assisted New York State Department of Environmental Conservation to understand what the staff requires in order to review a hydro submission, so that New York State Department of Environmental Conservation can give appropriate advice to applicants. In addition, the SHPO will develop a "checklist" which will spell out the kind of information necessary to review each hydro project, in order to review projects as expeditiously as possible. Upon request, we have met with New York State Department of Environmental Conservation and license applicants to discuss specific concerns.









## PROGRAM OVERVIEW FISCAL YEAR 1982

### MAJOR ACCOMPLISHMENTS FISCAL YEAR 1981

The major accomplishment of FY 81 was preparation of a draft Pennsylvania Preservation Plan to set policies and priorities to direct the program over the next few years. This plan (not yet adopted) has already provided a framework for discussing state objectives and needs. The input from various segments of the preservation constituency gathered through issues sessions at the annual conference and a series of forums throughout the state has been extremely useful.

The testing of the Resource Planning and Protection Process model in the Coastal Zone has been very enlightening. We found that the model was extremely difficult to explain and implement, even in a very small and discrete area. However, we believe that the framework for evaluation of resource significance will be useful to coastal zone management staff and the Bureau for Historic Preservation (BHP).

The results of targeting technical assistance and environmental review time on Community Development Block Grant (CDBG) communities have been very positive. A group training session and on-site visits have increased local officials' awareness of 106 requirements, and six programmatic memoranda of agreement have been executed. These should result in a reduced number of reviews and consideration of historic resources earlier in the planning process.

Major administrative improvements in FY 81 have allowed us to be more responsive to preservation issues. The environmental review procedure was revised with improved logging, tracking and filing systems. Survey and planning grants were monitored more closely, and improved work products resulted. Financial tracking systems, expansion of letter of credit and improved contracting procedures improved our ability to serve and control grantees as well.



FISCAL YEAR 1982 PROGRAM

The Pennsylvania historic preservation program grew to its present size and complexity largely in response to the availability of federal funds and the regulations and requirements governing use of funds. Using federal funds to leverage state and local investment in historic preservation, the program in its first 10 years grew to a staff of 18 professionals with surveys, planning, and acquisition and development projects throughout the state. However, constantly changing federal mandates and requirements caused the preservation programs to be fragmented. The foremost need of the BHP in FY 82 is to establish a state based and state directed comprehensive historic preservation program.

The Pennsylvania Historic Preservation Act of 1978 provides a mandate for such a state based program. The Pennsylvania Historical and Museum Commission (PHMC) is given specific authority to survey, research and register (Pennsylvania Register of Historic Places) historic resources, to provide information and advice on historic resources to the private and public sector, to solicit and receive funds, to acquire easements and to develop comprehensive plans for historic and archeological resources. The act also requires other "public officials" to cooperate with the Commission to preserve historic and archeological resources. An advisory Historic Preservation Board, appointed by the Commission, is provided. While this legislation provides a solid basis for a state program, its provisions have never been fully implemented, largely because of PHMC reliance on equivalent federal programs and response to federal requirements.

In FY 81, to direct further implementation of the Historic Preservation Act, BHP prepared a draft Pennsylvania Preservation Plan which describes alternatives and sets priorities for state based preservation efforts. A draft of the plan was presented to the Historic Preservation Board in September for review and comment. The directions and priorities described in this overview, as well as annual objectives listed in attachment A result from this planning effort. Three policy goals, expected to be adopted as part of the plan, will guide PHMC's preservation efforts: (1) To promote communication and understanding of preservation issues; (2) To assist local preservation organizations to carry out preservation at the local level where it is most effective; and (3) to maintain standards of historic significance.

In public preservation planning meetings held in FY 81, the primary concern expressed was the need for more and better communications between PHMC and preservationists at the local level and of preservation issues to those outside the preservation constituency. Over the past 5 years the Pennsylvania historic preservation program has emphasized preservation advocacy and created a fairly large preservation constituency as well as preservation awareness on the part of large number of state and local public officials. This constituency is now demanding information, advice and assistance in carrying out historic preservation projects and programs. Efforts during FY 81 included continuation of the Preservation Technology Project, seminars co-sponsored with the Department of Community Affairs and an annual preservation conference. During FY 82 we hope to refine our priorities in responding to requests for assistance and coordinate our technical assistance program so that efficient response mechanisms are developed for routine inquiries and staff is available where individualized attention is needed. Planned activities include development of a publications program, staff training and seminars.

An important way to maximize preservation effectiveness is to strengthen local preservation organizations and improve their ability to provide assistance and carry forward preservation programs. One group of organizations which merits special assistance because of their potential effectiveness and current problems is local Historic and Architectural Review Boards (HARBs) which review alteration, demolition and new construction in locally designated historic districts. Under Pennsylvania law, HARBs recommend approval or denial of permits to the municipality government which makes the final decision. Even without approval authority some of Pennsylvania's 43 HARBs are very effective, but most are not. We hope to continue information and assistance efforts for these groups in FY 82.

One additional mechanism for fostering preservation education and communication which has been proposed by the Historic Preservation Board is establishment of a statewide non-profit preservation organization. While we believe such an organization should be created by the private sector, we intend to provide any assistance we can in getting such an organization underway.

Over the past four years many historical and architectural survey projects have been initiated in a number of municipalities and counties. So far we've covered

about 20% of the state and received information on over 90,000 historic resources. We do intend to use funds, if they become available, to complete or close-out survey projects now underway. One problem has been that large quantities of data are being delivered to BHP but no system has been developed for convenient retrieval. In addition, survey data is not integrated with other resource information in the Pennsylvania Inventory. A high priority project in FY 82 will be the integration of survey and inventory information and implementation of a data retrieval system.

In the past Pennsylvania has had an extremely active nominations program. It has been organized to process all nominations submitted to BHP by local groups and individuals. However, because most individuals and groups are not trained to prepare nominations the quality of submitted material has often been poor. With the large volume of nominations we processed, nominations were sometimes unacceptable to the National Register and returned with questions. The process required a great deal of paperwork and clerical time and did not allow BHP to establish priorities for nominations.

As a result of FY 81 review of the Pennsylvania National Register process, a new system, designed to improve the quality of nominations submitted to BHP and the National Register as well as reduce staff processing and clerical time required, will be implemented in FY 82. We intend to make the procedure and our priorities available to the public. This system will enable us to set statewide priorities and provide a more careful evaluation of significance as well as respond to the public interested in nomination of properties in a more rational manner.

In July, 1981 the Statewide (A-95) Clearinghouse was abolished. This has greatly reduced the number of environmental reviews, and also impaired our ability to comment on projects early in the planning stages. We are in the process of contacting all block grant communities and federal agencies unfamiliar with the 106 process to request early notification. At the same time we hope to provide these communities and agencies with information on the process and documentation requirements.

The Commission's archeological component has been supported in the past 3 years by contracts for regional archeological surveys. These regional archeologists also



do field checks to determine high probability areas when projects may have an effect. Because FY 82 funding will not be sufficient to extend these contracts we plan to use federal funds to increase the Commission's archeological staff so that the archeological reviews will continue to be done in a way that provides agencies with information that is useful in project planning.

As part of establishing a comprehensive state based program we believe it is necessary to provide mechanisms for financial assistance in some situations. With reductions in, if not elimination of, federal grant assistance, alternative programs must be developed. One of our major initiatives in FY 82 will be to establish a statewide revolving fund to preserve significant resources. While the structure for such a fund has yet been developed, we intend to provide financial as well as other required support to get it going.

Through the environmental review process and other contacts with local preservation groups and issues, we've identified the need to make small, planning grants to threatened properties. Often a conflict between preservationists and local officials or developers can be avoided by timely financial assistance for feasibility or other planning studies. We plan to set aside funds for a program of emergency grants to serve this purpose.

Per federal requirements, 10% of the planning estimate is being reserved for certified local governments. No planning for disbursement on these funds has occurred because no federal procedures or guidelines have been issued.

### FUNDING

Because of uncertainty about continued federal funding, costs that were to have been paid to other parts of the state government and the Commission to cover approved indirect costs were not charged to fiscal year 1981 grant funds. In essence, state funds covered more than 50% of state costs. This leaves us with 1981 funds which will be used to cover staff and operational costs in the first quarter of FY 82. A separate attachment A for activities to be covered by fiscal year 1981 funds to be accomplished in fiscal year 1982 is included.









## PROGRAM OVERVIEW

The Historic Preservation Program of the State of West Virginia necessarily suffered during 1981 due to the Administration's rescission of FY81 funds. The state actually received less than 20% of its federal appropriation. With the drastic reduction in funds, measures were taken to identify a Historic Preservation Program that reflected decreased federal dollars and commitment. The most visible result of the loss of federal funds was a reduction in the size of the staff. Remaining staff were required to increase their work load to continue the functions of the office. The State, through the newly appointed State Historic Preservation Officer and Review Board undertook a reevaluation of its position and initiated formulation of policies and guidelines for a continued Historic Preservation Program. Results of this approach will be presented below.

Despite the hardships, some accomplishments were achieved in 1981, mostly as a result of efforts/projects begun previously. Highlights include nomination of a Railroad Historic District, which includes tunnels and bridges of the B & O Railroad between Turnelton and Rowlesburg. The significance of the railroad cannot be overstressed in the development of West Virginia and the course of the Civil War. This is the first nomination which underscored this importance as a theme or totality of the rail transportation industry as opposed to individual site significance, i.e. roundhouses, stations etc. Another accomplishment was the issuance of inscribed National Register certificates to owners of listed properties at a ceremony which included an address by the first lady and visual presentation of the newly listed sites to an audience in the State Theatre. 1981 saw the birth of a new private non-profit statewide preservation organization and a number of county and municipal Historic Landmark Commissions.

Two regional surveys were proposed for West Virginia in 1981. One was canceled due to funding difficulties; the second completed, which contributes to the process of comprehensive inventorying of the state. Three other projects stand out in the light of the comprehensive approach.

The listing of the Berkeley County multiple resource area; seven-county archaeological inventory; and the statewide historic bridge survey. The bridge survey is being done as a joint project with the Department of Highways. All bridges will be inventoried and a cataloging and information retrieval system developed which will be used in maintenance and planning by the D.O.H. All of the West Virginia publicly owned covered bridges were also listed on the National Register this year.

The reorganization of the Historic Preservation Unit recently led to a reevaluation of past performance and needs for future directions of the program. The results will be taken up in each of the three program elements - survey, registration, protection.

## SURVEY

The major problem identified with the survey component was the organization and utilization of the existing inventory. A large number of sites, individual



district, archaeological, etc., exist in the current State Inventory. Most of these were collected, however, as a result of response to inquiries or interest by an individual, municipal agency, or others. The information needs interpretation, referencing, organization; in short, a comprehensive approach to the collection and storage of site inventory. The RP3 approach was to be initiated in 1981, but the individual employed to develop the process was lost as a result of the recession. Steps taken towards developing a statewide usable inventory included the above mentioned regional and thematic surveys.

Supporting activities to be undertaken by the state to further the development of a comprehensive survey will be the continued geographic regional approach to surveying. These will coincide with already existing development regions in the state. Results will therefore necessarily be integrated in the planning process.

Another approach will be the formation of municipal and county historic landmark commissions. These can be established under existing state enabling legislation and will act as excellent local participants in the resource identification and planning process. They will be encouraged to conduct surveys of their jurisdictions, establish landmark registers and contribute to the state's overall inventory. Preservation, to succeed, must have the support and commitment at the local level.

On the statewide level, the office can act as coordinator of local and regional activities. We also hope to initiate surveys of the more broad thematic resources that exist. Work will include the investigation of themes such as: black history and development in West Virginia; rural religious movements; the coal, oil and gas industry; the glass industry; immigration and its relationship to West Virginia, particularly in railroad and transportation development; communication and transportation patterns, rail, road and water; industrial sites in West Virginia.

The thematic approach, particularly settlement patterns and the extraction industries, will integrate with current and projected development objectives of economic development agencies of the state and localities. Energy exploration appears to be West Virginia's contribution to the nation's future. Having an identifiable Historic Preservation Program addressing the significant historic development of the energy industry will aid in the sympathetic development of future energy industry.

### REGISTRATION

A major problem in the registration element of course has been the closing of the National Register for more than half of the fiscal year. Other contributing problems are the lack of identified qualified professionals to prepare National Register nominations and the burden on the staff to review and edit them. In the past a large majority of nominations were done in-office. We plan to develop a resource listing/file of professionals and other qualified persons to prepare nominations as required, out of the office.

Another problem which surfaced was the inability to place nominated sites in proper perspective to adequately determine comparative significance of sites in the state. This we hope will be remedied by the previously discussed upcoming

survey process. Included will be the establishment of local landmark registers to more properly reflect local significance.

One other concern surfaced this past year, upon review of the National Historic Landmark Program. To the dismay of our staff, West Virginia's contribution was not as representative as anticipated. We believe that a number of sites in West Virginia are significant to the nation. To remedy this situation we will review the National Register listing and consult with the Review Board, and Governor to nominate sites for National Historic Landmark Status.

### PROTECTION

The Protection element of the West Virginia Program has in the past proceeded satisfactorily. The office offers technical advice and assistance to the public and has been involved with preservation planning with other state agencies, local government units and the private sector. The department is also closely involved in the preservation of two of West Virginia's most prominent sites through the direct control of West Virginia Independence Hall and Camp Washington-Carver. We will continue to use these valuable resources.

The direct participation in protection through grants for construction projects is diminishing on the federal level. We also feel that, although there has been a successful A & D program with positive results, our protection needs can better be served at this time by concentrating available resources in other areas. To this end we do not include an A & D component in the FY82 application.

Our needs and directions are associated with an overall education and survey program. We hope to make protection of significant sites a locally based activity through the historic landmark commissions, governments, and private organizations of the state. With the survey and registration programs discussed above, the state's role will be to provide technical assistance to aid localities in protection of their identified resources. We also hope to educate the public in general historic preservation matters. Audio-visual programs in technical matters such as masonry cleaning etc., and general matters such as research etc., will be developed or acquired for presentations.

The new Economic Recovery Act will be a major inducement to the protection of historic sites in the state. We will provide technical assistance and education to promote the use of this valuable tool.

We will also continue to assist other state agencies in developing appropriate protection plans for historic properties under their control or affected by their actions. An example of this is the historic bridge survey with the Department of Highways. We hope to assist them in protection of the remaining covered bridges in the state.

The above will be assisted by our participation in the preparation of the West Virginia State Development Plan and inclusion of sections pertaining to Historic Preservation and Main St. Revitalization.



# Southeast Region



Alabama  
Florida  
Georgia  
Kentucky  
Mississippi  
North Carolina  
Puerto Rico  
South Carolina  
Tennessee  
Virgin Islands









## PROGRAM OVERVIEW

## General Statement

The 1980-81 fiscal year has been one of strange juxtapositions. At moments the program seemed to be on the threshold of making significant strides in the preservation of Alabama's cultural resources only to have those hopes dashed by becoming the sacrificial lamb of Washington budget politics at the next. We border on hyperbole only to accentuate the dominant mood of this year's operation of the state's historic preservation office, that is, one of bewilderment as to what one could expect to have as direction or resources in the current and coming year.

While we have spent considerable staff time in developing and planning specific goals, objectives, and strategies for improved performance concerning planning and protection for cultural resources, we are most concerned and demoralized by the fact that the prognosis for the receipt of resources to accomplish these programs is so mercurial. We wait with hopeful expectation for encouragement for 1981-82.

## Accomplishments

While the climate for preservation in 1980-81 was less than one of nourishment we were able to generate a number of accomplishments.

Survey: Within the survey component of the state's historic preservation program the major accomplishments have centered around the improved quality of surveys completed in FY81. This improvement has been dramatic over previous efforts. Present survey methodologies are of a much more rigorous nature and the scope of work has been enlarged to make sure that all structures 50 years or older are surveyed. Additionally, the individuals contracted to execute the surveys possess a higher degree of professionalism than in the past.

In FY81 we completed comprehensive surveys of four Alabama counties. These surveys represent 3,003 architectural/historical sites and 841 archaeological sites for a total of 3844 sites receiving greater resource protection planning and evaluation. The total area covered by these FY81 surveys equal 4,220 square miles.

Registration: The registration component of the state's program has had an unusual year because of the lack of regulations. The inability to process National Register nominations has given us time to catch up on a large portion of the backlogged nominations. We have also established a more effective logging and prioritizing system for presenting nominations to our review board.



Of the four major cities in the state, identification and evaluation of the central business district landmarks have been completed in two (Huntsville and Birmingham), and the same identification and evaluation are well under way for the other two (Montgomery and Mobile).

The registration component, as well as others, has been facilitated also by the addition of an architect to the staff. His expertise has been most useful, particularly in overseeing in-depth review of tax act certifications and A & D grant projects. Through his membership in the A.I.A. and its Historic Resources Committee and the American Planning Association and its committee on Historic Preservation Planning we have been having increased positive interaction and planning with these groups. He has instituted an annual preservation breakfast sponsored by the SHPO office at the A.I.A. convention and has convinced several American Institute of Architect and American Society of Landscape Architect chapters to hold monthly chapter meetings in conjunction with our annual statewide preservation conference.

Protection: The protection component operations have also been assisted by the hiring of the restoration architect since he provides that office with the capability to review architectural plans for rehabilitation projects in the state which require Section 106 comments. The architect's review has enabled us to process several Memorandum of Agreements between the State Historic Preservation Officer and various applicants for federally funded FmHA and HUD projects affecting structures on or eligible for the National Register of Historic Places.

Throughout FY81, correspondence and meetings were conducted with the Alabama Surface Mining Reclamation Commission (ASMRC) to insure the protection of cultural resources from future surface mining activities. At the present time, the ASMRC has included in its guidelines measures which are identical with 36CFR800. These guidelines are currently going through the public hearing process but should be adopted relatively soon.

Another accomplishment in the protection component has been the increased communication and cooperation between our office and federal agencies such as HUD, FmHA, and FERC. We have held formal and informal talks and meetings aimed at developing a greater rapport with individuals in our state who administer these agencies. We frequently find that these persons now call us to head off potential problems or simply to gain a better understanding of our program.

Grants: Despite the rescission of FY1981 Acquisition and Development funds we have worked on 37 grant projects during the current fiscal year. This includes 15 structures started with FY1980 funds and 3 projects started from prior year grants. We continued work on 13 old projects and started new phases on six. We also continued to see much use

of our state Historic Preservation Authority Bill which has been used to finance 20 million dollars in rehabilitation in the past 18 months. We look forward to a great expansion in the use of this rehabilitation tool in conjunction with the 25% Investment Tax Credit.

### Problems and Needs

Survey: While many accomplishments were recorded in FY81 there are still many problems and needs. The commission did continue to receive a few surveys of less than desirable quality. We continue to accept survey work initiated at the local level, and as long as we do, we will run the risk of receiving surveys of a compromised quality. There is little interest at the local government level for survey work; this is due to the fact that, unlike the National Register program, the public can see few direct results from surveying. We need to emphasize the fact that a historic survey is the first step, and perhaps the most important, in the registration planning and protection process. When and if the funding picture stabilizes we hope to accomplish more toward completing the surveys in high adverse impact areas. We also hope to do more in the area of predictive model building in surveying and will utilize the planned information retrieval system to enhance this effort.

gistration: The registration component's problems and needs are greatest in the following three areas in the Alabama program. First, the area of energy exploration is creating unique problems. The leasing of land for coal exploration and eventual strip mining presents the problem of assessing the eligibility of the cultural resources associated with the early coal mining industry in the state. Without a framework for evaluation of individual structures and communities, the state staff cannot make competent judgements on the eligibility of these resources. Here again the office needs to establish a predictive model to indicate which of the properties are eligible.

Another problem in registration is that of providing local governments with the capability of identifying, evaluating and protecting cultural resources. The problems associated with providing local governments with these capabilities have been largely solved for the four major cities; however, the same cannot be claimed for smaller cities. Huntsville and Mobile have full time professional staffs capable of providing necessary expertise. The Mobile staff needs only limited additional training to be able to prepare nominations needing only cursory review at the state level, and the city of Birmingham has been working with an excellent private group in the identification and evaluation of the city's resources. Montgomery has funded local private foundation efforts to accomplish the same but at present has no plans to establish in-house capabilities.

The problems associated with establishing local competence for registration in the smaller cities is much greater. Few have funds either for contract or staff positions for preservation planners. Additionally, trained personnel for paid or volunteer projects are difficult to recruit outside of the major cities or the two small university towns.

A third problem area in registration is that of minority related resource registration. One aspect of the problem is the lack of trained professionals who are interested in pursuing either area or thematic studies of minority landmarks. We also need to add staff to the SHPO office to allow us to initiate more minority programs.

Design: The hiring of a restoration architect has brought new problems and needs to light in our program. The majority of architects in the state, as well as many other design-oriented professionals, lack important knowledge about the "Secretary of Interiors Standards of Rehabilitation", contemporary design in an historic context, restoration principles and practices, and urban design in a preservation context. Increasingly larger numbers of these design professionals are undertaking rehabilitation or restoration projects with little or no previous experience in this specialized area. Consequently, a greater effort must be made at educating design professionals of the state.

Virtually all of the state's smaller cities and towns are suffering some degree of economic decline, and physical deterioration of their downtown business districts. There is great variation as to the degree of both the extent of the problems, and the sophistication of the approaches to the solutions. Some of these cities and towns are now beginning to suffer some of the development pressure evident in larger cities, such as suburban strip development, and downtown "urban renewal" -type schemes. There is little or no professional direction or guidance in determining policy, planning, or solutions to problems in these small communities.

Very little communication has existed in the past between the SHPO office and the design and planning professionals. There has been little SHPO involvement in the projects and activities of these professional organizations.

Protection: The protection component of the Alabama Historical Commission has always depended upon a manual search through our files for known cultural resources in any given area of the state. Now, with a greater workload but less staff to complete the task, identification of cultural resources within a project area has become very difficult and agencies requesting such information normally wait 30 to 45 days before our office can reply.



Alabama's cultural resources are endangered by seven major activities: (1) Energy development in the form of gas lines, hydro-electric plants, and cross-state transmission lines, (2) Energy resource exploration in the form of hydrocarbon drilling in central and south Alabama, (3) Energy resource extraction in the form of surface mining for coal throughout the northern third of the state, (4) Waterway transportation systems consisting of massive projects involving the construction of locks and dams, channelization, and impoundments, [the Tenn-Tom project and the Coosa River project are probably the two largest such projects in the nation], (5) Community and economic development, (6) Modern deep-plough agricultural techniques, and (7) Extensive timber harvesting, especially in the southern third of the state. The lack of knowledge concerning cultural resources throughout most of the state has not allowed our office to provide the kind of input we would like to have in the planning stages of activities 1 through 5 where we are required to comment. More staff time will be spent next year in trying to remedy this situation.

Grants: The main problem with the grants program in FY81 was the rescission of funds which eliminated our acquisition and development program. The A&D program generated a great deal of public interest in preservation and gave visibility to both the federal and state programs. The effect on minority groups is especially severe because the acceleration of minority interest in the preservation program came at about the same time the available monies declined. Relatively few minority landmarks can qualify for tax advantages so that the loss of an A&D program for which those landmarks could qualify is unfortunate. There are no provisions in Alabama for a state grant program to take up the slack so, for the time being, there is no solution to the problem.

### Strategies and Supporting Activities

Survey: The major strategy for improving survey activities will be the creation of a detailed master plan for the systematic surveying of areas within the state where the greatest impact and loss of cultural resources is taking place. We will determine all areas which have not been surveyed and then prioritize which counties or municipalities have the most critical need for protection. We will use FY82 monies to fund the most critical surveys.

Our survey team will develop a series of seminars to be held in Alabama's cities in order to educate local officials to the importance of survey work and to increase the level of expertise among surveyors in those areas. At these seminars we will also be instructing local officials how they can benefit from the planned information retrieval system. This should assist us in pushing decision makers into earlier consideration of cultural resources in the planning process.



Registration: In the area of energy resource exploration the state will work with the Center for Southern Studies in establishing a predictive model to use in evaluating the significance of cultural resources associated with the coal mining industry. This activity will be supported with FY82 monies.

The strategy for providing local governments the capability to identify and evaluate local resources will center around our physically going to them to provide workshops and seminars. . Anticipated activities include a three day training session with the staff of the Mobile Historic Development Commission aimed at raising their ability to prepare nominations to the point at which little revision is necessary by the state staff prior to review board submission. We will also work with the city of Birmingham in hiring and training an inhouse staff person to prepare nominations and establish protective strategies. Both of these activities will be funded with FY81 unobligated funds.

The staff will also attempt a concerted effort to find and encourage professionally trained volunteers willing to undertake thematic minority studies of existing landmarks and will work to find local matches for such studies. The public information officer of the staff has arranged for a notable local black architect to publish a series of articles in the Alabama Historical Commission newsletter on landmarks of Alabama's former black universities. We are also working with the Governor to make minority appointments to the commission when slots become available in January.

Education and information exchange will be given a top priority in working with the design and planning professions this year. This will be accomplished by developing an audio-visual program on the tax incentives in Alabama, and the use and interpretation of the "Secretary of Interior's Standards for Rehabilitation". We will also provide lectures and presentations for state and local chapter meetings of the American Institute of Architects, the American Society of Landscape Architects, the American Planning Association and other professional organizations.

Working with the smaller communities of the state to develop strategies and approaches for problem solving in downtown areas will be given a priority. A comprehensive "Main Street" type program will be launched with FY82 funds aimed at the revitalization of downtown commercial districts in small cities and towns across the state. The following are some of the activities which will be used to accomplish this goal.

A core of the state staff will be sent to several training sessions beginning with the "Main Street" program in Nashville, Tennessee. This will help in spreading the techniques and approaches to small town revitalization. We will develop Alabama oriented audio-visual materials, publications and graphic materials to explain the "Main Street" approach to small town revitalization, and

to use as educational and informational tools by the staff.

Other activities which will support the "Main Street" program will be a series of local seminars across the state by staff members, using the audio-visual materials developed, to explain the tax incentives for commercial rehabilitation, the Historic Preservation Bonding Authority, National Register commercial districts, and economic and physical revitalization.

Finally, using funding from FY82 and hopefully the Small Cities CDBG program we will select two or three pilot communities on which to focus our efforts.

ection: Using FY82 funds the Alabama Historical Commission will develop an Inventory data retrieval system through the utilization of the Alabama Development Office's computer program. Other protection activities in prior discussed areas are as follow.

(1) Since energy site development locations in the form of gas lines, hydro-electric plants, and transmission lines are hard to predict, assessment reports must continue to be relied upon for protection of cultural resources on a case by case basis.

(2) Energy resource exploration in the form of hydrocarbon drilling are usually randomly placed but do occur most often in the Mobile Delta and along all the coastal plain river regions of the state. The Alabama Historical Commission proposes to continue conducting cultural resource surveys in these regions through the use of Survey and Planning funds.

(3) Coal surface mining operations in northern Alabama can potentially destroy hundreds or even thousands of cultural resources eligible for the National Register of Historic Places. Although cultural resource assessments will be required for these activities, the Alabama Historical Commission hopes to enhance our overall knowledge of the cultural resources in this region of Alabama through the use of a FY82 Survey and Planning grant that would enable us to establish a predictive model of eligible properties. This would provide our office with the capability to have a more qualitative input into the planning stages of the surface mining activities in the State.

(4) Waterway transportation systems sponsored by the Corps of Engineers are probably larger in Alabama than in any other state. Although cultural resource assessments costing millions of dollars have been conducted by the COE and Interagency Archaeological Services along these major waterway projects, these assessments have only provided for mitigation measures along the immediate waterway boundaries and have not provided for the identification or protection of the numerous cultural resources that will be impacted later by private development along the waterways. Although individual assessments will be required by COE

permit requirements, the Alabama Historical Commission is hopeful that cultural resource surveys can be conducted along prime impact areas to develop predictive models through the use of Survey and Planning grants.

(5) Community development projects are increasing rapidly in Alabama due mainly to the availability of CDBG, UDAG, and FmHA funds. In the past, our office was hindered in its review of community projects due to our lack of cultural resource inventory information. The Alabama Historical Commission hopes to enhance our inventory of the cultural resources of each community through the use of downtown revitalization workshops to be conducted by our staff throughout the state. The Alabama Historical Commission will provide information packets designed to aid the community in conducting an inventory survey, prepare National Register nomination forms, and apply for tax certifications.

(6) The Alabama Historical Commission will continue to conduct cultural resource surveys with Survey and Planning funds within the major agricultural areas of the state in order to identify archaeological properties eligible for the National Register. Property owners with eligible sites on their lands that are threatened by modern agricultural techniques will be approached about the use of easements in protecting the site. In addition, a program to teach Soil Conservation Service field agents how to identify and record an archaeological site has been proposed. Such a program would enable the SCS to notify our office where archaeological resources are involved on projects where landowners have requested SCS assistance.

(7) The Alabama Historical Commission will conduct cultural resource surveys with Survey and Planning FY82 funds within areas of the state where extensive land alterations are occurring as a result of massive timber harvesting operations. Where eligible sites are discovered, land owners will be approached about the use of easements in protecting these sites.

Pursuant to P.L. 96-515, 10 percent of the planning estimate is being reserved for local government programs.







PROGRAM OVERVIEW

Federal FY 1981 represented a year of accomplishment and occasional frustration for the Florida SHPO office and staff. Considerable progress in defining and changing programs to respond to perceived and expressed preservation needs was made; however, the confusion engendered by conflicting signals emanating from persons or offices within the federal structure contributed to a decline in staff morale and consequent uncertainty about funding and ability to offer service vis-a-vis the public. Nevertheless, significant progress was made toward completing state survey goals through continued administration of prior year historic grant-in-aid funded and other, non-federally funded, survey projects; specification of a more helpful computer system was accomplished and the initial steps in acquiring it put in train; procedural aids for Registration were revised to reflect changes and extensive field work to supplement data already known about existing National Register districts was undertaken; and A & D grants program was monitored more thoroughly than had previously proved possible. Protection remained a particularly important and stable aspect of the Florida program, and this was especially evident in cultural review activities. Nevertheless, certain chronic problems remain, and others, stimulated in part by actual federal changes and uncertainties about other changes which at this time remain merely subjects for speculation, have injected themselves into the activities of the Florida SHPO office. The problems, together with strategies for their amelioration or solution, are among the items presented below.

Significant progress was made toward completing state survey goals. This progress was made possible through completion of 11 FY80 historic preservation grant-in-aid funded local or regional surveys and through non-funded surveys achieved through volunteer efforts; efforts of federally permitted or other similar agencies to ensure legal compliance; and surveys undertaken at the request of Federal agencies and other Florida State agencies and through existing formal interagency agreements between the Division of Archives, History and Records Management of the Florida Department of State, of which the Florida SHPO office is a part. The survey efforts resulted in recording of more than 11,000 previously unrecorded sites at a minimum level of documentation. Of these, about 7,000 were recorded as one of the results of the previously mentioned 11 S & P re grants. The remainder, approximately 4,000 sites, were recorded through in-house survey efforts and through surveys undertaken at the requests of other agencies. 173 surveys resulted from requests submitted by Federal agencies and by the Florida Department of Transportation, the Florida Department of Natural Resources, the Florida Department of General Services, and the Florida Game and Freshwater Fish Commission, and these produced files for 419 properties at a minimum level of documentation. Activity of the same type will continue during FY 82 and should result in about 100 surveys which should locate and produce files on between 150 and 200 sites at a minimum level of documentation.

Certain problems are chronic in considering the results of each year's survey activities, and it is not certain how these ought to be attacked. At the outset, it should be noted that public relations and careful explanation have not proved successful in combatting these difficulties, namely, the tendencies to ignore archaeological site-producing surveys in favor of those which provide information about historic sites and the tendency to survey urban areas more intensely and more often than rural areas. Although archaeological survey activity represents a considerable proportion of the in-house activity of the Florida SHPO office and a majority of the activity generated in response to requests from other State of Florida Agencies, and although SHPO staff archaeologists are prepared to aid or consult on prospective archaeological survey projects, Florida's SHPO has had relatively little success in convincing even prospective S & P grantees of the necessity for their considering archaeology as a valid portion of cultural resource surveys. Despite urging and exhortation, few FY 80 S & P grantees considered an archaeology component important enough to include in their plans or final reports. The apparent reason for this reluctance was the perception by prospective grantees that archaeology is a more expensive survey component than history or architectural history, and that archaeological survey would not bring about obvious tax benefits as is the case with structure-oriented surveys. Only one such survey was defined as archaeological. In a state where development activity represents as great a threat to cultural remains as any other, this leaves surveying the state for archaeological sites in the hands of Florida developers and specification of such surveys as much a portion of the cultural review process as of the survey component. A somewhat similar problem emerges when the approximately 7,000 sites documented through survey activities receiving FY 80 historic grant-in-aid funding are analyzed for urban-rural biases. Rural areas remain under-surveyed and therefore under-documented. Of the 11 surveys which received FY 80 historic preservation grant-in-aid funding, only 1 was concerned with identifying rural properties. In terms of sheer numbers, the preponderance of sites which were documented at a minimum level was enumerated in urban areas. Even in-house survey activities conducted by SHPO staff were concentrated in urban areas. In Key West alone, nearly 3,500 structures were identified, and 1,236 of these were documented at a minimum level.

Declining levels of federal funding may offer a partial solution to these problems, especially the rural-urban split; however, it is possible that measures specified to partially ameliorate the effect of federal historic preservation grant-in-aid budget cuts will further exacerbate the problem. Such funding declines will probably allow Florida SHPO staff members to study and carefully target areas of the state in accordance with previously agreed upon survey priorities, areas which have been traditionally under-represented in survey activity. Such prioritization will aid Florida's SHPO in using or awarding monies from Florida's Historic Preservation Trust Fund (FS 267.0617). Use of such monies will aid in solving the problems brought up by declining levels of federal funds. In addition, new



necessity for operating in close harmony (and funding in part the activities of) certified local government agencies to develop registration (and probably survey) procedures will afford a new opportunity for taking steps to alleviate the effects of the traditional rural-urban survey split. However, it is worth noting in this context that those local governments which act expeditiously to create certifiable authorities are more likely to be urban than rural. They are likely to possess the monetary means for supporting their authorities and will also probably have a partially aware and organized preservation constituency.

Specification of a more helpful computer system was accomplished and the initial steps in acquiring it put in train. The rationale behind this was simple: the existing system in use, GRIPHOS, does not allow for necessary speed and efficiency in entering and retrieving Florida Master Site File data. The Florida Master Site File is the statewide inventory of all known and recorded archaeological, historic, and architecturally significant sites and properties in this state. Since 1972, the aim for the FMSF has been to automate it as fully as possible. The attempt has thus far not succeeded, due to constraints imposed by budget and staffing levels and difficulties with software; however, the Florida Legislature has provided funds to explore software problems and to develop new software systems. This will entail a switch from the present GRIPHOS system to a more flexible and accessible CDBMS (Commercial Data Base Management System). This will supplement survey efforts and offer valuable contributions to efforts involving registration; however, the true measure of the worth of the CDBMS automation of FMSF will come as a result of its increased usefulness in cultural review. Effective automation of FMSF will also allow for retrieval and use of its files by allowing production of quarterly reports of microfiche, which will allow compilation of up-to-date regional subsets of FMSF which can be placed in various museums, libraries, and universities.

Procedural aids for Registration were revised to reflect changes, and extensive field work to supplement data already known about existing National Register districts was undertaken. Due to accumulations of changes in the nominations procedures, it was ascertained that clerical personnel were not always able to complete their duties with the usual efficiency. SHPO professional staff therefore revised this in-office manual; however, it is likely that other changes, about which there has been considerable speculation, will render this revision entirely obsolete, and it will have to be rewritten. An ongoing project neared completion during FY 81: the text for Technical Manual #2, a historic site research and documentation guide, was completed. The manual will be printed during FY 82 and will be issued to the public in response to questions about conducting research and documentation. When printed, Technical Manual #2 will be illustrated. Extensive fieldwork by SHPO professional staff supplemented the known data base for the Key West Historic District (listed in 1971). The detailed structures list for that district which resulted from FY 81 fieldwork identified more than 1,235 buildings which contribute to the district's character. A project of



long standing, proposal of an expansion of the Key West district, was aided by compilation of a list of more than 2,205 buildings in areas contiguous to the 1971 district areas which will be integral portions of the staff proposal for expanding the district. The near-hiatus in nomination caused by lack of applicable federal rules for privately-owned properties allowed initiation of a much-needed project by Florida SHPO professional staff: developing precise, small-scale maps for existing National Register districts within the state. In many cases, existing maps could not be used due to unclear boundary delineations or their resistance to reproduction. Some districts' maps simply did not exist. This project produced a series of 10 districts' maps; 6 remain to be completed.

Enthusiasm for historic preservation in Florida has probably suffered as a direct result of the decline of registration activities which are accessible to or which can be initiated by members of the interested lay public. Registration efforts did not cease; however, they paled in contrast to the efforts of other years. During FY 81, the SHPO did nominate three sites, all publicly owned. One, Plant City High School, received A & D grant funds as a result of its listing in the National Register. However, the Florida SHPO office has been unable to respond satisfactorily to the requests of many Floridians for aid in nomination; when the impasse over federal rules is broken, this will leave this office with a tremendous backlog of nomination work and will therefore leave it still unable to effectively respond to the needs of the public. This will probably exacerbate a chronic problem in registration: the inability of the Florida SHPO staff to initiate the largest proportion of the nominations which the office processes. While satisfying the needs of individual citizens is and should be a major part of the registration program, -- it has resulted in registration of such important cultural resources as the Miami Beach Architectural District (1979) and the St. Petersburg Lawn Bowling Club (1981) -- it also means that site selection is not necessarily subject to careful scrutiny and selection based upon priorities or upon actual architectural and historic merit. This problem may be partially remedied by the large numbers of sites which have been documented at least a minimum level during the extensive contract survey activity of the past three fiscal years. The files which resulted from these surveys will provide a useful data base from which the Florida SHPO office may choose significant sites for further investigation and nomination. Certainly, the conversion of the FMSF from GRIPHOS to the more usable CDBMS should be of great assistance in that effort: survey data entered in useful form may permit increasing flexibility in considering districts and multiple resource and thematic nominations. Florida has not yet undertaken either of the latter. It should be noted at this juncture that the new flexibility offered by adoption of CDBMS may be partially offset by proposed federal regulations requiring clear demonstration of ownership. This difficulty may in turn be partially offset by the emergence of several regional or local preservation agencies whose staff members possess professional credentials and whose efforts over the past several years have engendered a generally cordial informal working relationship between the Florida SHPO office and what may become the future certified local governments' agencies.

There is, however, one area in which the relationship between local agencies and the Florida SHPO office causes problems, and that is in regard to activities concerning the Tax Incentives for Rehabilitating Historic Buildings Program. There appears no lack of interest in this program: this office responded to 120 requests for information alone during FY 81. Beyond that measure, Florida SHPO staff members reviewed 23 Part I Historic Preservation Certification Applications and 25 Part II Historic Preservation Certification Applications; however, due at least to insufficient documentation, over 70% of the Part II Applications had to be returned for revision or supplemental documentation. A considerable amount of this activity, which results in disappointment for the property owner, seems engendered by local preservation bodies (duly constituted architectural review boards), which approve rehabilitation project work which does not conform to the Secretary of the Interior's Standards for Rehabilitations. This, of course, results in confusion and frustration of the property owner and a consequent loss of credibility by all governmental and quasi-governmental participants in the process. The Florida SHPO office will make a concerted attempt to educate members of these architectural review boards, together with other members of the interested public, by holding public meetings and workshops throughout the state during FY 82. In part, this type of activity will be made possible by a slackening demand for staff time in conjunction with A & D grant projects.

The A & D grants program was monitored more thoroughly than had previously proved possible. This was made possible by inability of the Florida SHPO office to consider or award new A & D grants during FY 81. Thus, the workload was substantially reduced: the slackening of the pace of new activity meant that projects could be monitored more closely and, what is most important, staff members were able to render more effective supervision and useful technical assistance to grantees. Contract documents for 10 A & D projects were reviewed and 40 on-site inspections of 25 projects throughout the state were made. The decline in numbers of active A & D projects means that the Florida SHPO office anticipates reviewing construction documents for 1 project and making 22 on-site project inspections during FY 82. More staff time will be freed for technical assistance in other areas. Eleven grant-assisted projects remain to be monitored and completed during FY 82. The Florida SHPO office intends to carry out this work with FY 81 funds, per the amended FY 81 S & P program. As these remaining projects are completed, the Florida SHPO staff's technical assistance efforts will be redirected to enable this office to serve a broader preservation public with information and with planning and review services.

Protection remained a particularly important and stable aspect of the Florida program, and this was especially evident in cultural review activities. An important aspect of this process is the activities of the Cultural Resource Management Team, which reviews all environment-altering projects received by the Florida SHPO, thereby freeing other professional staff members to conduct or oversee other protection, survey, and registration



activities. The Cultural Resource Assessment Team reviewed 2,863 projects during FY 81. All but 237 were either deemed unlikely to have effects upon significant sites (based upon location or upon previously documented significant disturbance) or had sufficient information to permit assessment of site significance and allow preservation guidance. The 237, however, were either recommended for survey or had site assessment data requested. Nine scopes of work for surveys were reviewed 7 additional projects which were reviewed had specific site methodology recommended and 173 survey reports were received and reviewed by the CRMT. When projects are reviewed and survey recommended, the locales within the survey tract in which sites either have been identified or it has been judged possible for sites to occur are plotted on the project map, together with an indication of the portion of the tract recommended for survey. Because of the importance of development in Florida, the SHPO intends to continue during FY 82. Other efforts at making this component of the Florida program more effective included submitting draft guidelines on archaeological and historical site survey and testing methodology and report preparation were prepared and submitted for comment to the Florida Archaeological Council during FY 81. The guidelines will be re-drafted to reflect suggestions for improvements, then submitted to the FAC membership for further review during FY 82. The Florida SHPO intends to adopt the results as its recommended guidelines, also during FY 82. Cultural resource review and other aspects of the Florida SHPO activities have been summarized and distributed to concerned professionals and lay people as Chapter 17 of the Manual of State Regulatory and Review Procedures for Land Development in Florida, as the historic preservation element of the Florida Coastal Management Program, and as part of the information needs checklist form letter (which includes guidelines for making cultural resource review or information, and technical assistance requests) which was mailed to more than 450 agencies and planners.

In addition to its protection of historic sites and properties in accordance with federal preservation laws and state laws regarding development, Florida's SHPO (the Division of Archives, History and Records Management) also spent considerable time and money in defending the state antiquities law in the federal courts, defending particularly the state's claim to ownership of antiquities on state-owned sovereignty submerged lands. Florida will continue its efforts during FY 82. Decisions are expected in the United States Supreme Court and in the United States Southern District Court. These legal actions are important to insure the continued protection of shipwrecks and other submerged historic sites from treasure hunters and looters.

An information package about local historic preservation ordinances and regulations was distributed by the Florida SHPO. Data included in this package came about in part through the stimulus provided by the terms of the Tax Reform Act which make the SHPO office responsible for initial review of local preservation ordinances. Of the 7 reviewed during FY 81, just 2, City of Orlando and Dade County, were forwarded to Atlanta. The others were informally reviewed and returned with comments or corrections. Thus, all cities, towns, and

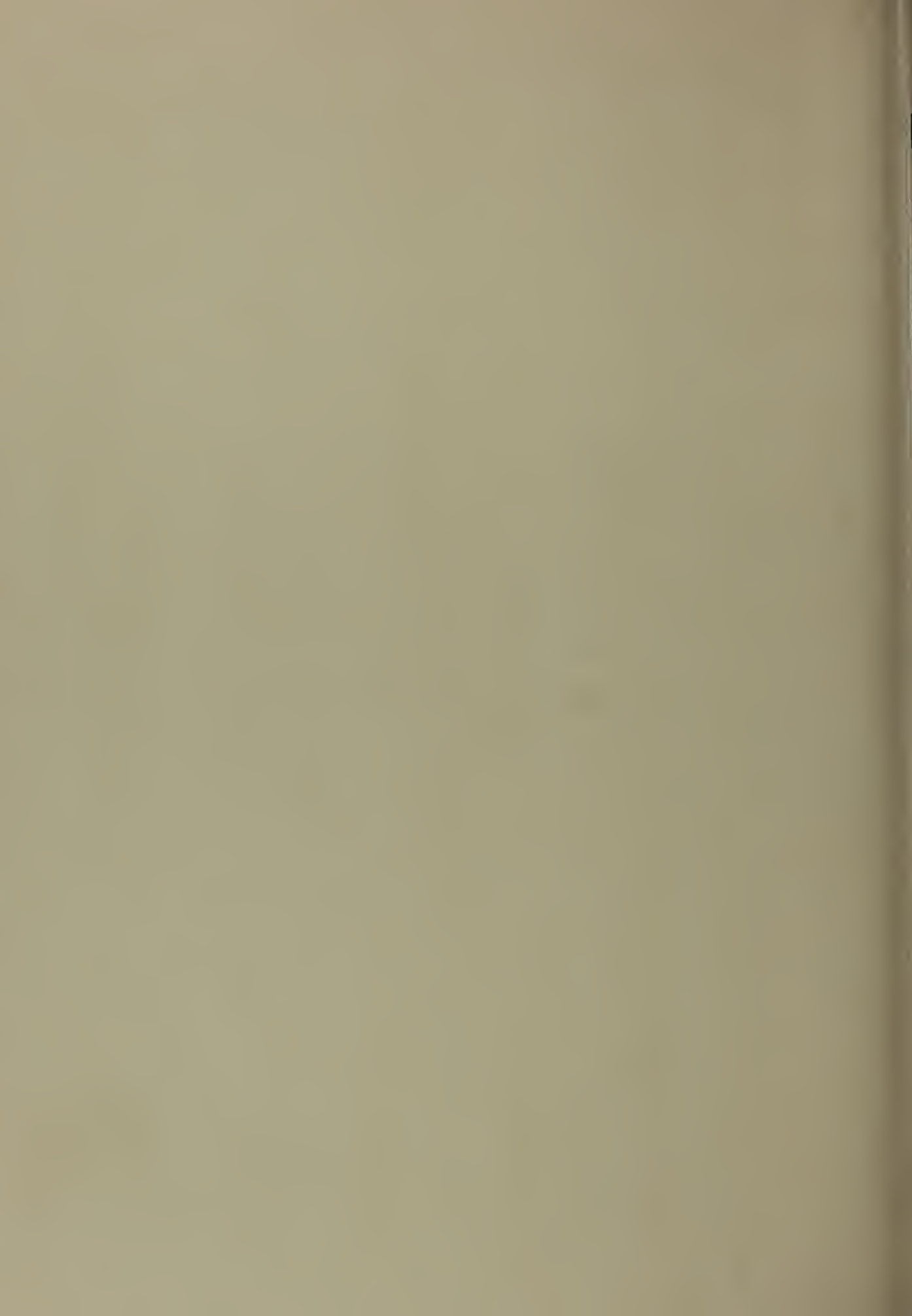
counties in Florida were contacted by the SHPO office and requested to supply copies of pertinent ordinances. This effort bore fruit, as 39 ordinances were received, and 44 other communities without ordinances indicated a desire to receive copies of a model ordinance. The Florida SHPO office will prepare such a model ordinance which will meet the requirements of both the Tax Reform Act and Florida Statutes.

Thus it can be seen that much of what will occur during FY 82 will be an extension of what the Florida SHPO staff has accomplished previously. It is unfortunate that A & D funds will not be supplied during the coming year; however, it may be that professional staff thus released will be able to aid in survey and protection. It is likely that the Florida SHPO office will utilize grant monies for survey, protection, and registration to be conducted on an in-house basis by professional staff already in place. These staff members will also work toward applying new registration rules to the state of Florida when such rule finally become available. In any event, they will be conducting surveys and seeking to educate the public as represented by existing architectural review boards and historic preservation authorities. They will, even more importantly, work to develop and implement procedures for working with certified local governments pursuant to P.L. 96-515. Ten percent of Florida's FY 82 planning estimate of \$472,151 is being reserved for local government programs.









## III. PROGRAM OVERVIEW

Major Accomplishments

During FY 81, the Historic Preservation Section has been involved in projects covering major program areas that have resulted in significant gains for the preservation program in Georgia. Given the role tax benefits for preservation play as a primary federal tool to encourage rehabilitation, the Historic Preservation Section has increased its efforts both to publicize and effectively utilize the Tax Reform Act program. These efforts have resulted in a dramatic increase in the use of the program by investors with 69 comments made on requests for certification of rehabilitation in FY 80 and 106 made in FY 81. During FY 81, the Historic Preservation Section assembled relevant information on the tax program from various agencies and organizations and consolidated it into a single application and instruction booklet which contains information on the tax provisions, the certification process, and special rehabilitation concerns, as well as a blank application form, a sample application using a Georgia example, and the Secretary's Standards. This application booklet effectively meets the growing interest of investors in use of the Tax Reform Act program.

A second means of providing information on the tax program to the public has been through a continuing series of workshops initiated with the program's inception in 1976. In FY 81, specifically, the Historic Preservation Section, with assistance from the Southeast Regional Office of the National Park Service, conducted a day-long workshop in Atlanta to discuss certifications of significance and the interpretation of the Secretary's Standards, using case studies from Georgia to stimulate discussion. Architects, contractors, developers, planners, and preservationists attended the workshop, and a summary of the day's discussions was prepared for public distribution.

These efforts to improve the tax program in Georgia have had a substantial effect on a major project in the state. A developer in Augusta who owns a majority of buildings (approximately 170) in the Pinched Gut Historic District began to rehabilitate those structures in October 1980, with the intent of taking advantage of the preservation tax benefits. Once aware of this project, the Historic Preservation Section began making periodic site visits to the district to discuss the rehabilitation work with the applicant. Potential problems were identified, solutions discussed, and special work sessions were held between Historic Preservation Section staff and the developer's designer and construction manager to explain preservation techniques and the certification process. In addition, written materials on various rehabilitation issues were forwarded to the developer. At the present time, with over 60 projects reviewed, early problems with rehabilitation techniques have been corrected and the project is an excellent example of using the Tax Reform Act as a positive incentive to the revitalization of the district.

In other program areas, workshops have also been used successfully to convey preservation information to other agencies, organizations, and the general public. During FY 81, Historic Preservation Section staff, in coordination with the Cultural Programs staff of the Southeast Regional Office of the National Park Service, presented a workshop on rehabilitation standards and methods for the housing staff of the City of Savannah and representatives



from a local bank, the building inspector's office, the Historic Savannah Foundation, and several developers. The workshop grew out of a Memorandum of Agreement for housing rehabilitation in Savannah's Victorian District, and focused on interpreting the Secretary's Standards for Rehabilitation at the local level.

Other techniques used by the Historic Preservation Section to disseminate preservation information include a "Fact Sheet" series developed to explain specific Historic Preservation Section programs. One-to-two page summaries have been prepared on the Tax Reform Act, the National Register program, and an overview of all Historic Preservation Section programs for widespread distribution.

An activity which encompassed the survey, environmental review, and grants program was the effort to survey and evaluate Georgia's historic bridges. With the assistance of a Historic Preservation Fund grant-in-aid, the Georgia Department of Transportation completed a bridge survey during FY 81 which was closely monitored by the Historic Preservation Section. The survey resulted in an overview of the history of bridge development in Georgia and recommendations on National Register eligibility for surveyed bridges. This information will also be used in the development of a comprehensive data base on which to make preservation planning decisions.

The Historic Preservation Section has also been involved in two other major planning efforts during FY 81. As one of six states chosen to participate in the National Main Street program, sponsored in part by the National Trust for Historic Preservation and the Department of the Interior, Georgia was in a unique position to encourage downtown revitalization efforts. The Historic Preservation Section participated in a statewide task force to direct this work and presented two technical assistance workshops: a session on rehabilitation techniques for student architects developing a downtown plan for a Main Street city and a structural survey session held for the five Main Street project managers. Through a Historic Preservation Fund grant-in-aid, the Historic Preservation Section was also able to participate in an innovative planning study for the Nacoochee Valley, a 2500-acre rural National Register historic district. This type of preservation planning study, in which rural development pressures were evaluated against realistic owner perceptions, is a first for Georgia. Through this work, which made extensive use of citizen participation workshops, the preservation of this historically significant and environmentally sensitive area, located in a rapidly developing part of northeast Georgia, should be enhanced.

Another major accomplishment is related to the Secretary of the Interior's Discretionary Fund planning grant for the Martin Luther King, Jr. Historic District, a National Historic Landmark. As its major focus for National Historic Preservation Week, the Historic Preservation Section sponsored a visit to Atlanta by Carl Westmoreland, a nationally-known minority neighborhood revitalization specialist from Cincinnati. Mr. Westmoreland toured the King district and held discussions with the groups responsible for the preparation and implementation of the planning study for this intown neighborhood. The visit also included a presentation to the neighborhood residents, which focused on rehabilitation techniques available for use in the district.

The Historic Preservation Section has also been involved in a continuation of a project to survey, evaluate, and encourage the rehabilitation of Georgia's historic county courthouses. Following the completion of a thematic

National Register nomination in FY 80, Historic Preservation Section staff were involved in two follow-up projects. First, as part of a public awareness campaign, the Historic Preservation Section prepared a technical assistance package on courthouse rehabilitation for distribution to county commissioners whose courthouses are listed in the National Register (114 courthouses total). The packets and a National Register certificate were usually presented by regional preservation planners at ceremonies recognizing the listing of the courthouse on the National Register. The Historic Preservation Section also played an advisory role in a complementary project funded through the Georgia Committee for the Humanities for a photographic exhibit on the state's historic courthouses. Sponsored by the two Georgia College faculty who prepared the thematic nomination, this exhibit was displayed throughout the state and was coordinated through regional preservation planners.

At the completion of its third year, the regional historic preservation planner program, sponsored in conjunction with Georgia's Area Planning and Development Commissions (APDCs), continues to be a most effective means of offering preservation planning assistance throughout the state. Besides the general provision of assistance to local governments, preservation organizations, and individuals, (planners answered more than 3800 technical requests in FY 81), several key activities have been undertaken by planners in FY 81. A booklet prepared by the Coastal APDC on the economics of the Tax Reform Act has been distributed statewide by the Historic Preservation Section to fifty downtown development authorities, chambers of commerce, and preservation organizations. Historic structural survey activity, funded as separate Historic Preservation Fund S&P grants and directed by regional planners, has been undertaken in four APDC regions with one survey in a large fourteen-county APDC focusing on county seats and other incorporated towns. Also, the surveys in the eight-county Coastal APDC were evaluated and updated to reflect current thinking on National Register eligibility. During FY 81, the Historic Preservation Section has also stressed to regional planners, through the development of regional preservation priorities and increased emphasis on the preparation of meaningful Area Development Plans, the integration of preservation into other regional planning efforts. Throughout the year, particularly in the Historic Preservation Section's review of 171 CDBG preapplications, of which 53 were funded in FY 81, there has been a demonstrated increase in regional planners' attempts to work with APDC economic and community development staff to achieve that goal.

Through the Office of the State Archaeologist, the Historic Preservation Section has been able to conduct archaeological assessments on state-owned lands. The information gathered is being used by the Interpretive Programming Unit of the Department of Natural Resources for general development planning purposes as well as for incorporation into the statewide inventory. In FY 81, twenty surveys were undertaken which identified 36 sites. In addition, the publication of the Georgia Archaeological Research Design Volume I, which provides specific methodology on conducting archaeological surveys in the state, will add to public and professional understanding of survey as the initial step in cultural resource protection.

### Problems and Needs

Any discussion of problems and needs encountered in administering a statewide preservation program cannot effectively separate the program areas of survey, registration, and protection. This is especially true for concerns

in such areas as comprehensive planning and public information and education, which tend to relate to all SHPO programs. Therefore, the problems listed below must be reviewed with that consideration.

## Survey

The SHPO responsibility for conducting a statewide survey and maintaining a statewide inventory of historic properties has resulted in a major effort to document and evaluate Georgia's historic resources. During FY 81, 13 counties, 18 county seats, and 25 small incorporated cities in the state were surveyed at a minimum documentation level to gather information on historic structural resources. These surveys, which have been coordinated through regional preservation planners, have been structured so that the information gathered is in a format more useful to the Historic Preservation Section's registration and protection programs than were previous surveys.

Problems still exist, however, in both the existing and ongoing historic structural surveys, since 23% of the state is still unsurveyed. Those surveys undertaken in the past often reflect a dated view of National Register eligibility, little emphasis was placed on historical context or the identification of districts, and the potential for identifying National Register eligible properties for use in the environmental review and Tax Reform Act programs, in particular, is limited. Even though 77% of the state has been surveyed, at best the surveys are only at a minimum documentation level and relatively few of the surveys attempt to provide an evaluative context for the resources. This lack of overall comparative data hampers the structural survey effort, especially when attempts are made to utilize this material in comprehensive preservation planning, and in attempts to understand the distribution and range of Georgia's historic resources.

Surveys of archaeological resources are handled differently in Georgia than are historic structural surveys. The strategy for identifying archaeological resources relies on projects funded with Historic Preservation Fund money, assessments undertaken as part of environmental review activities, archaeological assessments on state-owned lands, and the overview of archaeological resources being prepared as part of the Georgia Archaeological Research Design (GARD) process. This difference in strategy makes a statistical comparison with structural surveys difficult. Because of the cuts in the Historic Preservation Fund, it was not possible to fund any S&P projects for archaeological survey in Georgia in FY 81. Although no large compliance projects were undertaken in FY 81, 87 surveys were completed for 106 compliance purposes, which identified 483 sites of the total 505 added to the inventory. In addition, work on the GARD overview (Review of Prehistory and History in Georgia from an Archaeological Perspective) continued.

Problems have resulted due to these approaches, however. The surveys undertaken under environmental review, while tending to occur in critical planning areas (e.g., downtown Atlanta as a result of Metropolitan Atlanta Rapid Transit Authority construction), cannot be put in priority order according to informational needs on resources. Also, work on the GARD overview, which is critical in placing identified resources within the proper statewide context, slowed with the resignation of the project manager and due to the volunteer status of the GARD task force members.



While it relates to all program areas, due to its comprehensive nature, the development of the Georgia Historic Preservation Plan (GHPP) can best be addressed under the survey program. The GHPP, which is a requirement of the National Historic Preservation Act (NHPA), is a top priority of the Historic Preservation Section. During FY 81, a large majority of activities scheduled under GHPP-related objectives were completed. However, the uncertainty related to the federal budget process made progress on the GHPP difficult. The ability of the State Historic Preservation Officer to undertake long-range planning was brought into question when the very existence of state programs was in jeopardy. While attempting both to broaden the range of planning participants in the GHPP process to include other state organizations and agencies, and to advise and assist other agencies in their historic preservation activities, as mandated under the NHPA, the Historic Preservation Section encountered a reluctance to develop preservation planning priorities which lessened the effectiveness of those participants and thus affected the ability to use their input. In addition, efforts to organize the known information on Georgia's resources through a resource protection planning model have been hampered due to changing staff priorities (related to budget uncertainties), the lack of interest in interdisciplinary professional participants, and the enormous size of the undertaking.

### Registration

The registration program area directly relates to the Historic Preservation Section's responsibility under the NHPA to nominate eligible properties to the National Register. In FY 81, the major problem with this area has been with the hold on processing nominations at the federal level due to the lack of regulations. Although the Historic Preservation Section has continued its research and evaluation schedule during this period (with 51 individual, 10 district, and 2 multiple resource area nominations ready for processing), the hold has confused sponsors of the nominations, foiled attempts to maintain an orderly nomination process, and frustrated efforts to utilize the Register as a planning tool. This last concern is especially evident in the Tax Reform Act program. Investors with large development projects in major urban areas have placed considerable pressure on the Historic Preservation Section to guarantee decisions on National Register eligibility so that they will be assured of a building's eligibility for tax benefits. This has often caused unnecessary administrative and public relation problems for the Historic Preservation Section. Since certified local governments will play a greater role in the registration process as a result of the 1980 Amendments to the NHPA, there is a need to develop an appropriate state-level mechanism for local government certification and funds transfer. Due to the absence of Department of the Interior regulations, no steps have been taken toward certifying local governments to date.

The remaining problems in the registration program relate to the lack of understanding of National Register criteria and how to document resources as evidenced by the quality of the historical documentation submitted to the Historic Preservation Section. Because of the large number of requests for assistance and to encourage public participation, this office requires a local sponsor for nominations, particularly for a district or multiple resource area, who can assist in gathering information. These sponsors often do not fully understand the National Register program or the level of information required to complete a nomination. Consultants who prepare nominations for local groups are also often unaware of the documentation and analysis needed for a nomination. This lack of understanding results in



nominations which must then be reworked by Historic Preservation Section staff and which can cause delays. The need is also increasing to re-evaluate early National Register district nominations in light of questions raised related to property eligibility under the Tax Reform Act program.

## Protection

The protection program includes a variety of Historic Preservation Section activities that are mandated under the NHPA, including the Historic Preservation Fund (HPF) grants, environmental review, public information and education, preservation planning, and technical assistance programs. Of those identified in the protection program in FY 81, problems were especially acute in the HPF grants program administered in Georgia by the Historic Preservation Section. The rescission of FY 81 funds, which resulted in the cancellation of both planned A&D grants, damaged both the Historic Preservation Section's ability to offer financial and technical assistance through these grants as well as the Historic Preservation Section's credibility with potential sub-grantees. One A&D grant, for the stabilization of the Union County Courthouse, was to continue the focus on preservation in key downtown areas by working with local government officials. The later uncertainty with the FY 82 HPF allocation further undermined Historic Preservation Section efforts to administer an effective statewide preservation program.

Throughout FY 81, the Historic Preservation Section was also involved in a federal and internal audit of HPF activities. While the audit did result in the clarification of administrative needs and issues under the HPF grant program and the assurance that all grant projects since the beginning of the program in FY 70 to the present now meet all compliance regulations, the activity had a major disruptive effect upon the Historic Preservation Section. The equivalent of three full-time staff persons were assigned to the audit from May through August, substantially altering Historic Preservation Section plans in several program areas (especially grants, National Register, and environmental review).

The general decrease in grant funds has naturally affected Historic Preservation Section efforts to offer critical support and incentives for preservation activities with statewide benefit. Past grant monies have been used in such critical planning areas as minority historic districts, rural preservation districts, urban intown neighborhoods, and coastal zone areas. With the decrease in funds experienced in FY 81, however, the Historic Preservation Section was only able to fund 14 S&P grants, of which 12 were for regional preservation planners. As money becomes available, the Historic Preservation Section will continue to assist the Department of the Interior in making grants and loans to special groups (e.g., minorities).

A second protection program mandated under the NHPA is the assistance provided in environmental review activities. Although strides have been made in improving the review and compliance system, problems remain. A major problem in the environmental review program, which saw 1162 A-95 project review notices in FY 81, has been a restructuring of the Department of Natural Resources' Comprehensive Review Unit, the coordination link with the State's Clearinghouse for A-95 project review. Further, the general lack of understanding of the compliance process by federal agencies and local governments with delegated responsibilities, and the seeming disregard for

the requirements of the 106 process continue to frustrate efforts to make the review program an effective mechanism for identifying and considering cultural resources in community and economic development planning.

Another problem, noted in the past by agencies such as the Advisory Council on Historic Preservation, the National Conference of State Historic Preservation Officers, and the Federal Highway Administration, as well as the Historic Preservation Section, is the duplication between Section 106 of the NHPA and Section 4(f) of the U. S. Department of Transportation Act. This duplication has resulted in increased time frames for review of transportation projects, as Section 106 cases generally require two to six months for review while 4(f) cases in Georgia have averaged 6 to 18 months for review.

The provision of public information and education is another way in which the Historic Preservation Section encourages the protection of historic resources. While a priority within the Historic Preservation Section, a lack of staff time and budget to devote to public information and education activities reduces the program's effectiveness. Having answered 2,075 individual requests for specific preservation information in FY 81, the Historic Preservation Section needs a statewide vehicle for providing information on preservation program activities and technical issues to the public.

Providing planning assistance, whether to local governments in developing their historic preservation awareness and capabilities, to preservation organizations concerning the Tax Reform Act program, or to individuals on preservation funding sources, has included both direct and indirect (through the HPF funded regional planners) assistance to important constituent groups. While involvement with local governments has increased (as seen by the Historic Preservation Section's work with the courthouse preservation and National Main Street projects), the budget uncertainties have resulted in the loss of two regional preservation planners and a temporary hold on the hiring of two other planners. This reduction from 16 to 12 planners has hampered Historic Preservation Section efforts to assist local governments. In addition, a continuing misconception of the Historic Preservation Section program by local government officials (e.g., seeing National Register designation as a detriment to development) results in problems in dealing with these governments.

In the Tax Reform Act program, 69 certifications of rehabilitation were reviewed by the Historic Preservation Section in FY 80, and this number increased to 106 in FY 81 without a corresponding increase in staff. With a greater emphasis on providing preliminary review, a large workload has been placed on the Historic Preservation Section because of the need for at least two reviews. In addition, technical assistance requests under the program, both on rehabilitation issues and tax law changes, have increased to 453 in FY 81. The Historic Preservation Section has sometimes found it difficult to offer sound technical assistance in cases where National Park Service decisions and directions are unclear (e.g., enclosure of rear porches, new additions). This situation suggests that the National Park Service consider giving the states more responsibility for making decisions under the Tax Reform Act program.

#### Meeting Needs in FY 82

In recognition that the federal budgetary crisis and regulatory reform have had enormous impact on the operation of state historic preservation offices, the Historic Preservation Section will focus on basic activities in



FY 82 which will further the effective implementation of programs authorized under the NHPA, as amended. Given the particular problems and needs in the survey, registration, and protection program areas in Georgia, this office will concentrate on improving the procedures under which each program area is carried out, strengthening the capabilities of local governments, preservation organizations, and regional planners to assist in implementing programs, and working with critical planning agencies whose activities can serve important preservation program goals. In addition, throughout the following discussion is the understanding that the Georgia Historic Preservation Plan process guides the direction of the state preservation program and that Historic Preservation Fund-supported regional preservation planners in 14 of 18 APDCs in the state form the primary vehicle through which effective preservation program services are provided to local governments and preservation groups.

## Survey

Due to the differences in methodology for surveying historic structural and archaeological resources, activities to meet needs in the survey program reflect these separate approaches. In the structural survey effort, regional planners will continue their activities to update and add to existing minimum documentation level structural surveys. By continuing the emphasis on development of district and multiple resource area nominations for the National Register, the numbers of properties recorded at an intensive documentation level will be increased. This approach will add to the usefulness of historic structural resource information needed in the Tax Reform Act and environmental review programs. During FY 82, the Historic Preservation Section will also monitor the structural survey in the Altamaha Georgia Southern APDC, an eight-county rural planning region in the southern portion of the state, to insure the development of comprehensive structural resource data. Because the socio-economic conditions in the southern part of the state often fit the criteria for CDBG project funding, information from this survey will be useful for local government decision-making as well as for environmental review purposes.

Given a lack of survey and planning money to undertake specific area archaeological surveys, the Historic Preservation Section will continue to direct archaeological survey through the 106 compliance process and through state land development activities. With major federal project development being undertaken along urban development corridors (e.g., the Metropolitan Atlanta Rapid Transit Authority's north-south line) and along the coast (e.g., King's Bay facility in Camden County, coal port facility development near Savannah), the Historic Preservation Section will encourage survey efforts for 106 compliance which accommodate development needs as well as meet cultural resource identification needs outlined by Georgia Archaeological Research Design recommendations. Through the efforts of an interdepartmental (Department of Natural Resources) team, strategies will be developed for improving archaeological survey work on state land to meet planning needs related to park, historic site, and wildlife management area development.

To answer the need for a planning framework in which to evaluate Georgia's historic structural and archaeological resources, the Historic Preservation Section will develop a proposal which considers the resource protection planning model and incorporates the Georgia Archaeological Research Design. This proposal will be geared to increasing the SHPO's ability to respond to key planning issues such as minority preservation and downtown

revitalization. As part of this activity, the Historic Preservation Section will continue efforts to cross-reference site information from all SHPO programs into the county survey documents and into the archaeological site file at the University of Georgia. In support of statewide survey and inventory needs, the Historic Preservation Section will also work with key state agencies (Department of Education, State Building Authority, State Fire Marshall, Department of Natural Resources) whose building ownership and/or land management responsibilities make them instrumental in developing state preservation planning priorities. By publishing the Black History Project results, the Historic Preservation Section will make comparative information on black settlement patterns available for statewide use.

## Registration

In carrying out SHPO responsibilities for the nomination of properties to the National Register, the Historic Preservation Section will develop and implement procedures to expedite the effective processing of the current nomination backlog, based on revised regulations. Development of National Register procedures will consider the need to accommodate property owner requests for registration in order to receive Tax Reform Act benefits. A major supporting activity in the registration of properties in FY 82 will be the holding of public information meetings for 22 historic districts and/or multiple resource nominations.

By coordinating the National Register program through regional preservation planners, the Historic Preservation Section will continue its efforts to provide effective assistance to local preservation groups, consultants, and potential Tax Reform Act applicants at the local level. A state mechanism will be developed for certifying local governments to play an increased role in National Register and other preservation programs and 10% of the state's planning estimate for the HPF will be reserved for local government programs. Through local government certification, local government officials' understanding of historic properties will be enhanced and their capabilities in using the National Register as a planning tool will be increased. Because many of the National Register districts in which major Tax Reform Act activity is taking place are early districts needing a reevaluation of boundaries, newly certified local governments will be encouraged to undertake local district reevaluation. An emphasis on National Register Review Board meetings as opportunities for increased public awareness and the development of a concise National Register booklet combining criteria for listing, procedures, and information forms will improve general awareness of what properties meet National Register criteria and how properties can be adequately documented.

## Protection

In the protection programs, and specifically in the grants program, the Historic Preservation Section will continue to supply needed technical assistance to ongoing grant projects. In the absence of newly funded A&D projects in FY 82, the Historic Preservation Section will assist applicants in identifying alternative funding sources. Monitoring the preparation of the Dooly County Courthouse historic structures report, a FY 81 grant, will continue Historic Preservation Section involvement with county courthouse preservation issues, a priority of FY 81 activities. Because of the large proportion of S&P money the Historic Preservation Section will commit in support of 14 regional preservation planners carrying out a broad-based scope of responsibilities at the regional level, and to continue to increase their effective provision of preservation services, the Historic Preservation Section will



continue a schedule of quarterly meetings/workshops for planners on priority topics (e.g., downtown revitalization through the Main Street example) at various locations around the state. Finally, activities to refine ongoing grants administration procedures will reinforce the results of the recent audit.

In the environmental review program, with internal changes in state review systems, the proposed changes in Advisory Council regulations, and a shifting of federal funding to block grants administered by other state agencies, a prime activity of the Historic Preservation Section will be to clarify environmental review procedures in support of increased local government capability in review. To encourage and reinforce this capability, the Historic Preservation Section will develop specific information tools (e.g., how to assess effects, fact sheets on review as a planning tool) for public distribution. This office will also continue to refine coordination techniques with regional preservation planners whose early involvement in project development, especially in projects such as CDBGs within urban redevelopment areas, can make most effective use of review as a planning consideration. To increase the Historic Preservation Section's ability to provide sound professional opinions on the potential for archaeological resources being present within the impact areas of federal projects, specific strategies (e.g., mapping of previously surveyed archaeological sites statewide) will be developed. In mid-year, a workshop for federal agency representatives will be conducted on the 106 compliance process, its relationship to other review processes, such as 4(f), and the changes in the Advisory Council's regulations.

To answer the diverse constituent needs for preservation information on technical, program, and "state of the art" issues, the Historic Preservation Section will develop an appropriate newsletter for widespread distribution. Through continued planning and technical assistance to the Main Street project in Georgia, both as state task force participant and preservation program administrator, and through coordination with regional planners, the Historic Preservation Section will contribute to capability-building among downtown development authorities, city councils, and merchant associations in the participant cities. To accommodate the increased use of the Tax Reform Act program as a primary protection program, the Historic Preservation Section plans to revise the Tax Reform Act booklet and information materials\* and make needed administrative adjustments as warranted by the shift to larger-scale developments. Building upon past efforts and to meet specific needs in the program, the Historic Preservation Section will also conduct workshops on the program for the state A.I.A.,\* for the increasing numbers of large-scale developers brought to the program by the new taxing provisions of the Economic Recovery Tax Act of 1981, and to regional planners whose support services to this program are increasing in importance.





## PROGRAM OVERVIEW

## Fiscal Year 1982

Fiscal Year 1981 proved to be a year of great change for the Kentucky Heritage Commission. A new director and State Historic Preservation Officer was appointed by Governor Brown in January. In July, the Heritage Commission became a part of the newly-created Kentucky Department of the Arts, Heritage Division. A new Review Board was appointed as was a new Heritage Advisory Board. Some of the major accomplishments for the fiscal year include:

- 1) Expansion of the Kentucky Main Street program. The Main Street program was begun utilizing Fiscal Year 1980 Survey and Planning funds and was intended to assist four cities. In the second year of the program, two additional cities were added. A preliminary review of the program undertaken this summer indicates great success. Approximately \$13 million of private funds have been committed to the rehabilitation and improvement of downtown commercial buildings in the six Main Street cities. Perhaps a more important indication of success is the improved perception that merchants, city officials and the local populations have of their Main Streets.
- 2) Development of a two-year Survey Plan. In an effort to complete the statewide survey, a plan was developed and put into action to accomplish this task within two years. The plan involved increased survey work by the agency as well as increased survey subgrants. Nineteen counties were comprehensively surveyed this year. Reductions in staff will force us to utilize grants to a greater extent for survey work in the future; but the goal has not been changed.
- 3) The RP3 process was begun for archaeology. Two state universities will develop regional archaeological preservation plans and initiate RP3 processes to generate input from archaeologists and federal agencies. The Heritage Division has sponsored an RP3 planning conference for the Green River Archaeological Management Area and will hold a similar conference for the Western Kentucky Management Area in Murray in mid-October.
- 4) Computerization. A major effort during Fiscal Year 1981 was the computerization of the historic and archaeological site files. This project originally began as an effort to computerize site information in the eastern and western coalfields but was expanded to include the entire state.



All known archaeological sites, as well as 70% of the historic sites, are in the computer file at this time. We expect to have all historic sites surveyed to date in the file by January 1, 1982.

Fiscal Year 1982 will be a time of great challenge for the Heritage Division.

Due to shrinking tax revenue, a reduced staff and the uncertainty of federal preservation funding, the basic state preservation program must be redefined to meet these challenges. A significant effort during Fiscal Year 1982 will be the development of a mechanism to bring private funds into the state preservation program. This can be accomplished by setting up a non-profit preservation foundation and a statewide revolving fund. The key to a successful, comprehensive preservation program over the long-term is a firm financial backing for the program. Additionally, state preservation incentives must be developed to compensate for the lack of actual restoration funds. During Fiscal Year 1982 the Division will be actively working for the passage of Constitutional Amendment #2 and the legislation required to make these tax incentives operational.

The amendment would allow local governments to offer a property tax moratorium for up to five years on historic properties that have been substantially restored or rehabilitated. Other legislation includes the establishment of a Main Street revolving fund to provide low interest loans for seed money for communities to develop downtown revolving funds and the institution of a 10% tax credit for certified restoration and rehabilitation projects.

### Survey

In 1976, Kentucky initiated a ten-year survey program designed to identify and evaluate all historic resources in Kentucky through intensive survey efforts. After five years, 70% of Kentucky's historic resources have been surveyed by State Historic Preservation Office staff or professionals working for local communities that have received Survey and Planning subgrants. During Fiscal Year 1981 a plan was developed that would allow the survey to be substantially completed within two years. Kentucky's historic buildings surveys have focused on Kentucky's communities with a population of 10,000 or more people and in areas that will be effected by growth and development either through suburbanization or more importantly, the development of energy-related projects.

Prehistoric resources are being identified through reconnaissance level surveys carried out by the State Historic Preservation Office staff and through intensive problem oriented surveys carried out by professionals utilizing Survey and Planning grants. Survey efforts and regional research design efforts are currently being concentrated in surface mining areas of the state (50%) and sites located along the Ohio River where energy related projects are being planned on a massive scale.

During Fiscal Year 1982 a major shift in our survey efforts will be made necessitated by the reduction of Heritage Division staff. Whereas, in the past, most surveys were done in-house, we will now focus on developing survey subgrants to complete this task. The basic survey methodology will remain the same. Priority for grants will be made in urban areas and in areas of expected growth. A new priority for survey will be in communities interested in developing Main Street projects that are related to their own overall community and economic development programs.

We are proposing to fund 19 new Survey and Planning grants for historic resources and three Survey and Planning grants for archaeological resources to continue the RP3 process. Additionally, division staff will undertake six surveys. A major effort during Fiscal Year 1982 will be the certification of local governments to receive 10% of the state's federal historic preservation funds. We foresee no problems with this requirement since all of our existing subgrantees can be easily certified. (P.L. 96-515)

### Registration

Interest in the National Register program continues to grow in Kentucky primarily as a result of the preservation tax incentives. It has become a tool utilized by many of Kentucky's cities as part of their comprehensive economic development efforts. As with the survey program, much of the 1982 National Register activity will be delegated to subgrantees due to division staff reductions. All of our 1982 Survey and Planning subgrantees will be required to develop National Register nominations as part of their contract. We anticipate that rural county surveys will rely primarily on the multiple resources format and that National Register nominations in Kentucky's urban areas will continue on a district-wide basis.



We foresee a great pressure for nominating urban sites to the National Register due to the increased interest created by the Economic Recovery Act of 1981. A majority of staff time will be spent developing these applications. National Register nominations in rural areas, a past priority, may be curtailed. During Fiscal Year 1982, we will be working with local communities to develop Survey and Planning subgrants to complete National Register nominations.

### Protection

The Protection Program element is developing projects and programs which are based upon the data collected and evaluated during the survey and registration process. As the number of sites increases as a result of increased survey and National Register work, our ability to make a substantial commitment to their preservation becomes exceedingly more difficult. A major problem that has concerned the division for years is what is the best method or methods to provide a meaningful follow-up once the sites have been identified. This will become more important during Fiscal Year 1982 due to a reduced staff.

In an effort to provide the best possible assistance in Fiscal Year 1982 for the Protection Program element, the division proposes to do the following:

- 1) Expand the Main Street project to include eight cities. In addition, a two-year project review will be undertaken and published for use of other cities wishing to initiate a similar program. The division will provide technical assistance to all cities setting up Main Street programs.
- 2) Priority will be given to projects utilizing the tax benefits in all three program elements. During Fiscal Year 1982 the division will concentrate on explaining the new tax benefits and will attempt to visit each rehabilitation project at least once during the planning and construction processes. To date, over 100 rehabilitation projects have applied for certification representing approximately \$35 million worth of rehabilitation. We anticipate that this could double within the next two years.
- 3) RP3. Continue the RP3 process for archaeology and establish initial contact with individuals and institutions which should be involved in an RP3 process for historic sites. We plan to hold RP3 conferences for the five remaining archaeological management areas.

- 4) In order to facilitate communication between the State Historic Preservation Office and local preservation efforts, we will establish local advisory committees in all 120 counties. The committees will assist in delivering program services and in providing local preservation efforts with needed information about preservation opportunities.
- 5) Expand the Survey and Planning subgrants program to allow as many areas to be surveyed as possible. During the county surveys, division staff will assist the surveyors by providing technical assistance and by working with local planning agencies, city officials and local preservation groups which will be utilizing the survey results.

The Kentucky preservation office provides valuable planning assistance with specific information as it relates to the section 106 process. The major problem in this section is ensuring a quick response time for requests for information. Only one staff person is assigned to coordinate this activity and at times it can be overwhelming. Whenever possible, staff are assigned to visit key development projects, especially in areas of the state that have not yet been surveyed. We will continue to visit as many projects as possible within existing staff capabilities. During Fiscal Year 1982 the division will continue to provide federal agencies and planning agencies with specific information on their responsibilities pursuant to section 106. Assistance will be given to critical planning agencies identified during Fiscal Year 1980 and 1981 to inform them of their historic preservation responsibilities. We will continue to work with Lands Unsuitable for Mining section of the Department of Natural Resources in reviewing mining permits and in developing an effective mechanism to deliver services. The continued computerization of our site files will greatly facilitate these planning efforts.









## PROGRAM OVERVIEW

The state of Mississippi finds a program overview most difficult to write, given the uncertainty of federal funding and the obvious lack of knowledge of the programmatic course of action to be adopted by the new administration at Interior. For this reason, the following "overview" is more a retrospective than it is a prospectus. Mississippi, of course, will reserve ten percent of its funding for certified local government participation, if that funding is available and if certification procedures and regulations are in place.

Until recent years the survey and registration of historic sites in Mississippi were inconsistent processes largely left up to the preferences of the professional staff. Although a great deal of information was gathered in these early years, this approach left gaps, was inconsistent in both quality and focus, and proved to be a frustration to orderly compliance review and planning. In the late 1970s, the multiple resource and thematic nomination tools were made available to the states and Mississippi began a vigorous effort to abandon the single site nomination in favor of placing large numbers of properties in nomination by use of these newly-devised formats. The results were dramatic. At the beginning of Fiscal Year 1979, the state was represented by approximately three hundred sites listed in the National Register. In less than three years that statistic now stands at 4,713. Included in the expanded registration effort were nominations specifically prepared to broaden the scope of the state's Register entries in order to illustrate the diversity of resources not usually associated with Mississippi. For example, the nearly seven hundred properties comprising the Farish Street Neighborhood Historic District were nominated as significant resources in a black business and residential environment while the Scenic Drive Historic District was submitted as an important reminder of the Gulf Coast's historic tourist industry. The effort to balance Register entries from Mississippi will continue throughout the coming fiscal year with such varied topics as the Delta Blues, the textile industry and the works of a Swedish architect slated for nomination.

In 1980 the survey and registration activities of the state program were reviewed to identify areas for improvement. It was discovered that while registration was considered more than adequate, the survey continued to be the weakest program element. Survey only sufficient for registration purposes was the rule and thus failed to provide a useful contextual framework and continued to frustrate the review and compliance functions of the state historic preservation office. Created from this analysis was the state's highly successful "eligibility survey" methodology. County-wide surveys are now conducted prior to the assignment of any registration projects so that a proper context may be established, and the registration needs of an individual locale can be identified. Furthermore, by using the criteria for evaluation, the material gathered in the survey process has become consistent and uniform despite the variety of professional survey staff. During Fiscal Year 1981, for example, an "eligibility survey" was conducted in historically and architecturally significant Marshall County. Of the over four hundred sites in the county identified as meeting the criteria for evaluation, approximately three hundred structures in the county seat were selected for nomination. This example illustrates that survey and registration are no longer essentially the same activity and that the comprehensive scope of the "eligibility survey" enhances the protection and planning responsibilities of the state. Being satisfied with this methodology, the staff



will undertake four new surveys in Fiscal Year 1982 which should produce an expected 1,000 additional entries into the survey files.

The protection of cultural resources through the A-95 process should result in approximately 1,500 projects receiving review in Fiscal Year 1982. This figure has remained somewhat constant over the past two fiscal years. Due to the eligibility survey, however, projects are expected to be reviewed in an increasingly expeditious manner. While funding levels prohibit protection through the defunct acquisition and development program element, the state will continue to monitor eighteen ongoing projects to ensure compliance with the Secretary of Interior's Standards. The most useful protection tool in Fiscal Year 1982, however, will continue to be the tax incentives for historic commercial properties. An estimated thirty requests for certification of both significance and of rehabilitation are expected to be reviewed by the state historic preservation office in Fiscal Year 1982. This represents an increase of approximately 35% over the previous fiscal year and illustrates an increased public awareness of these incentives caused by the state historic preservation office's education programs. Passage of the Economic Recovery Act of 1981 will require an accelerated educational effort by the state which should be rewarded by an even greater protection program for historic income producing properties in Mississippi.

From the viewpoint of the state historic preservation office, the Mississippi archaeology program is one of a slowly but steadily accumulating body of knowledge regarding the archaeological resources of the state. The process is too slow, and, although no new statistics can be cited at present, it is assumed that the site destruction continues. Most of the survey and excavation over the past year has been project oriented with the work being done to satisfy legal obligations of federal agencies involved in the various projects. The Tennessee-Tombigbee Waterway project mitigation continues to be the major archaeological activity in the state. A large percentage of the staff's time is involved in reviewing and commenting on the archaeological work of the Tenn-Tom and other construction projects, and in reviewing project plans submitted to this office for our comments as to the necessity for survey. So far in this fiscal year, seventy-seven cultural resource survey or excavation reports have been reviewed, and inventory and technical information supplied on 197 occasions. The vast majority of this work was project oriented.

For several reasons, the comprehensive statewide survey of archaeological sites has not proceeded as rapidly as could be desired. One of the primary reasons for this is the fact that during the late sixties and early seventies a great deal of salvage work was done by the state historic preservation office staff which has not yet been reported. Two of the field archaeologists have been involved in the process of reducing the backlog by completing the lab work and report writing on about a dozen excavations as well as three county surveys. Due to budget cuts, the size of the archaeological staff has also been reduced by two in recent months, thus presenting an added obstacle to increasing the rate of survey work.

A beginning toward a more systematic, problem-oriented approach was made last fiscal year with the survey of known data per physiographic region. This study has summarized the known archaeological problems of each region and forms a framework for a more realistic approach which is now being followed by the staff at as great a pace as is possible. The Pearl River drainage is now being systematically sampled for archaeological sites. Lee County in northeast Mississippi which is the last home of the Chickasaw east of the Mississippi River is currently the target of



time frame specified by the Advisory Council's procedures.

Two critical planning agencies, the U. S. Forest Service and the Mississippi Geological Survey initiate and license two programs which may adversely affect cultural resources in Fiscal Year 1982. The clearcutting of timber on U. S. Forest lands may be affecting archaeological sites eligible for the National Register and a programmatic memorandum of agreement will be sought to ensure the minimal adverse affect. In addition we will seek to amend the state's surface mining plan to provide for archaeological surveys when the state historic preservation office requests them rather than only when the mining authority agrees that surveys are necessary.

Amendments to the state's Antiquities Law failed to pass the legislature; however, the bill will be resubmitted in hopes that at least the definition section will be approved. The Board of Trustees of the Mississippi Department of Archives and History will again be asked to recommend to the legislature a bill authorizing a state board to license the practice of archaeology. Until these bills are passed, the state review and compliance activities will continue to be the approval or denial of alterations and demolitions to publicly-owned National Register and National Register-eligible properties.

One major responsibility of the Mississippi Department of Archives and History is to provide information to the general public. This dissemination occurs in many forms: speeches and lectures to local, state, and national associations; tours of the division's historic properties; technical information given in the field; and advice and information to newspapers and public officials on state preservation activities. In addition, staff members daily answer telephone, written, and in-person inquiries about grants, archaeology, architecture, history, and preservation. Finally, because the state of Mississippi possesses very few preservation organizations with professional staffs, the Department of Archives and History retains primary responsibility for publishing and promoting preservation in the state.







#### IV. Program Overview

The North Carolina Archaeology and Historic Preservation Section of the Division of Archives and History underwent major financial and personnel changes in FY 1981 which threatened programs and created a period of uncertainty and caution. The financial crisis derived from federal rescission of FY 81 funds for two acquisition and development projects, as well as cutbacks in state appropriated funds for the Monitor project. Even more serious, however, were the present federal executive branch administration proposals for the FY 1982 budget which would have provided no money for the state programs. Since North Carolina has received the second highest amount among the eligible states and territories over the past two years, this proposal constituted a source of major concern. Accompanying the federal proposals of cuts in the Historic Preservation Fund were orders within state government prohibiting replacement in vacant positions paid with federal funds. Because Congress failed to complete the appropriation process prior to September 30, the funding issue remains in doubt, although an inspired effort by the preservation constituency throughout the nation quickened hopes that an appropriation for the states might be forthcoming.

The North Carolina program experienced even more dramatic changes in personnel during this fiscal year. Replacements took place in more key positions than during any comparable period in recent times. They included the State Historic Preservation Officer, the chairman of the North Carolina Historical Commission, the head of the Underwater Archaeology Branch, the Environmental Review Coordinator, the Public Education Programs Coordinator, and the Preservation Planner. With the demise of state support for the Monitor program, the Archaeology Conservator's position was lost. In addition, the head of the Survey and Planning Branch took a six-month leave of absence, and the Deputy State Historic Preservation Officer had been in the state and on the job just six weeks prior to the advent of the fiscal year. There can be no doubt that without the mature level of professional commitment by the remaining staff that the North Carolina program could have experienced a disastrous year.

Despite the problems which these conditions produced, the section initiated new activities that accomplished better delivery of certain services and promised improvements in others. In the administrative area, changes in budget management led to improvements in the expenditure of funds. Each branch (there are seven for this purpose) received its own operating money with which to implement previously established purposes. During the latter quarter of the fiscal year, a review of goals and issues within the section led to expansion of professional staff participation in the identification of critical needs and solutions for the program. Although this action will not have produced tangible results by the end of the fiscal year, it should lead to several positive results including higher staff morale and more broadly based management decisions, as well as overall program efficiency.

Grants administration underwent major changes that improved the selection of projects for both federal grants-in-aid and state special appropriations. A workshop to acquaint prospective applicants enabled the public to better

understand the federal grant process. Staff review of applications was expanded to include individuals and points of professional view that had not been part of the earlier system. Finally, the Historical Commission created a new Grants Advisory Committee to guide it in its policy decisions regarding federal and state monies destined for public consumption. The new committee reflected a broader base of professional and lay concerns than has been the case previously. These initiatives have created the most professionally objective and publically representative system of project selection in the history of the state program, and provide an example that other states may wish to emulate.

To offset the impact of total demise of Acquisition and Development grants from the Historic Preservation Fund, the North Carolina program has proposed the creation of a private program to maintain a source of development grants within the state. Although the idea has not yet received acceptance, it essentially proposes that the state form a partnership with the Preservation Society of North Carolina to raise and distribute private monies for restoration purposes. This concept would maintain the initiatives that were implemented in FY 81 with public funds, but would differ in that the money would derive from private sources such as foundations and corporations. It would also provide a stronger purpose for the Historic Preservation Society, and bring that organization more into the public consciousness. If successful, and we believe that it has every chance to succeed, the private grant program will be able to serve as a model for adoption by other states.

Among the most beneficial initiatives taken by the section during this period has been the expansion of its computer program. Originally an effort to improve the archaeology program, the system has begun to accommodate a variety of other areas. All survey information is currently being fed into the machinery that will enable a host of uses heretofore unavailable (see 1982 GMR #1). Those uses include a more efficient review of geographic areas for environmental review purposes, comparative analyses of properties of significance in architecture and history as well as archaeology. One important novel use of the computer is the entering of material for monitoring the annual work program. It has simplified the reporting process, and shortened the compilation time for such things as the Year End Reports (see 1981 End of Year Report). The recent application of the computer equipment also has value for other states.

Although many of the initiatives taken during the year included more people in the process, the loss of financial support forced consolidation of some program elements. Before the end of the fiscal year, the Underwater Archaeology Branch was converted to a unit of the Archaeology Branch that had dealt primarily with sites on the land. This change promises to improve communication between the administration of the section and the physically remote underwater operation. It also holds the promise of a more clearly integrated archaeology program with a distinct opportunity for clarifying the presently confused public image of archaeology as a public program.

In the same light, the public education aspect of the state program received more emphasis and better direction. At the beginning of the fiscal year, public education was an ill-defined area of the section that was coordinated among the various branches by a member of the administrative unit. By the end of the fiscal year, a Public Education Branch had been created that drew staff support directly from one other branch and another



section of the Division of Archives and History; assumed the implementation of programs for the Stagville Preservation Center, an antebellum plantation in Durham County that will serve as a focus for programs to enlighten the general and preservation-oriented public in the values and techniques of historic preservation. The decision to elevate the public education function to branch status stemmed from the section administrator's conviction that public awareness of historic preservation is the most important assignment that the state program has--and that it is the most neglected not only within the state of North Carolina but the nation as a whole. The creation of this branch will form the base for our highest state program priority for FY 82--the establishment of public education and public awareness as the major purpose of the program.

The survey for significant properties continued according to plan during FY 81 (see attached year end report), although the prospect for maintaining this phase of the state operation is severely threatened by proposed federal cutbacks (see GMR #1 and 2). Many staff members and all of the statewide survey activities are funded from federal sources. The surveys, per se, are actually conducted by contractors hired by local political jurisdictions with grant-in-aid assistance from the section. The staff of the Survey and Planning Branch serve as project overseers and administrators to assure compliance with section standards of quality and punctuality. The demise of federal funding would eliminate professional positions in the staff and destroy the survey program as it has been conducted over the past several years. This prospect has led to the evaluation of what has been accomplished under the survey effort since its inception in the late 1960s. A major conclusion is that while the survey grants program has stimulated local interest in many parts of the state, it has also skewed the results in favor of the interested and affluent. Those jurisdictions that either did not respond or could not afford a survey requiring fifty percent local match were ignored regardless of the significance of history or architecture existing in the area. Consequently, while the grant program for survey assured certain kinds of results, it failed to provide a statewide comprehension of cultural resources. Plans are presently in formulation stages to correct this blind spot.

At the request of the State Professional Review Committee, the section began efforts to define local significance as a criterion for nominating properties to the National Register (see GMR #3). Although the effort was not completed prior to the conclusion of FY 81, it occupied a great deal of thought and attention during the last quarter. Because the National Park Service is undergoing a similar examination of the question of significance in historic preservation, it is a fortuitous circumstance that the North Carolina staff engaged this question. The results of the state study will be made available to the NPS staff when they are completed in written form.

In relation to the issue of energy resource exploration, the North Carolina program is concerned about the recent emphasis given to peat mining in the eastern counties of the state. Although no specific survey response has been drafted to cope with this possibility, the Division of Archives and History is participating in an archaeological survey of several eastern counties with the 400th Anniversary Committee which is organized



to celebrate the quadricentennial of the founding of the Roanoke Colony (GMR #2). This joint venture will culminate in the most comprehensive examination of the prehistory and contact history ever undertaken in North Carolina. The findings will bear a direct relationship on the peat mining that is currently in the planning stages in that they will serve to assist in the review of those activities.

Protection of the cultural resources of the state will also be strongly affected by the proposed cutbacks in federal funds. Should a total reduction in the North Carolina apportionment take place, it is unlikely that the state will participate directly in the implementation of the Advisory Council regulations, at least in the fashion that it has in the past (GMR #5). The state program will, however, maintain a very close watch to assure to the maximum degree possible that federal agencies comply with their responsibilities to federal law and regulation in the protection of cultural resources significant in the state's past. The section will also continue its review of state projects in accordance with established law and practice.

On a more positive note, the section has taken steps to provide a more affirmative image in the environmental review process (GMR #5). Because the Advisory Council regulations pertaining to Section 106 of the National Historic Preservation Act are so pervasively misunderstood, a decision was reached to alter the approach to dealing with federal agencies. That decision stresses the positive aspects of review as a mechanism to both assure against unnecessary destruction of cultural resources and enable the federal agency to carry out its mandate with minimal interference. Consequently, during FY 82 the name of the activity will be changed from Environmental Review Coordination to Inter-Governmental Assistance Coordination. Implied in the name change is an emphasis on assisting federal agencies and those receiving federal funds to carry out public projects meet their legal obligations in accordance with the letter and the spirit of Section 106.

Protection of significant properties will be affected by the proposed cuts in federal funds in ways other than review. The absence of a grant-in-aid program for Acquisition and Development (GMR #6b) will mark a major setback in the preservation of important structures. Efforts are being made to reduce the impact of this possibility (see above), but other opportunities exist also. The revisions in the Tax Act (GMR #4) which provide major incentives for commercial property owners will become a key tool in the protection of those kind of historic places. The staff Consulting Architect assumed the responsibility for implementing the state role in the Tax Reform Act during FY 81, and his part will increase. It is envisioned that some if not all of the Restoration and Preservation Services Branch staff will play important parts in assisting private owners with tax questions.

In this regard, the Main Street Project, an activity of the National Trust for Historic Preservation, will increase during FY 82, involving the Archaeology and Historic Preservation Section to a greater degree. During FY 81 the section played a minor role because a different department of government had primary responsibility for working with the National

Trust. Toward the end of the fiscal year, renewed contacts with the Main Street project indicated that the Archaeology and Historic Preservation Section will become more heavily involved in this project. The Main Street project will be expanded to several more communities in the state, which will use historic preservation as a means to improve their economic situation.

In the area of ethnic and minority history, the North Carolina program has earned very high marks during FY 81. Research Historian Joseph Mobley completed his study of James City, a post-Civil War black settlement in the Trent-Neuse Rivers area across from New Bern. The Division of Archives and History selected Mobley's work as the best effort within the division and published it. In the area of legislation, the Archaeology Branch worked closely with the North Carolina Indian Commission in the drafting and lobbying of legislation that protects Native American sites within the state. This marked a very important turning point for everyone concerned with the protection of sites significant in Indian history. The section also sponsored a seminar on black builders in North Carolina during Black History Week, and employed a black female intern to organize and coordinate the program. The Division of Archives and History employs a Black History Coordinator on a permanent basis who works with the section in the development of minority programs and activities. These activities constitute an on-going commitment to minority history efforts which will be pursued during FY 82.

Shortly after the enactment of the 1980 amendments to the National Historic Preservation Act, the Section Administrator and Preservation Planner began discussions on methods to implement the ten percent pass-through funds to certified local governments. Those discussions were interrupted by the replacement of the State Historic Preservation Officer followed shortly thereafter by the national administration budget proposal for FY 82 that forced concentration on more immediate internal needs. Consequently, the plan to establish a strategy for implementing this provision of the 1980 amendments is now scheduled for development during FY 82. Pursuant to P.L. 96-515, ten percent of the planning estimate is being reserved for local programs.









PROGRAM OVERVIEW

The major accomplishments of FY81 in the State Historic Preservation Program must be led off by the accomplishment of a working model of the Resource Protection Planning Process (RP-3) which we have renamed as the Cultural Resource Management Plan for Puerto Rico (C.R.M.P.). The C.R.M.P. was designed for immediate application in the daily operations of the State Historic Preservation Office. The C.R.M.P. basic framework allows it to be expanded through concise contracts in either administrative or academic focus. In the past, no centralized inventory source was available either for the purposes of expanding the state-wide inventory assessing relative values for the purpose of National Register Nominations, assessing compliance matters in a clearly judicious manner, nor assessing relative priorities for inventory or acquisition and development project selection.

The C.R.M.P. is divided into two formats, one, organizes the data according to themes or categories (eg. agriculture, transportation, archaeological sites, and so forth). The other format organizes the information by geo-political divisions (eg. municipalities, wards, and such), which allows rapid visual assessment of the varied resources within a project area.

The C.R.M.P. has been very succesful in allowing the State Historic Preservation Office to rapidly and justifiably assess any number of daily operations which previously lacked the necessary information for good management.

The success of the C.R.M.P. has also been measured in its extensive use by federal, state and local governments in planning, compliance and protection programs. Copies of the C.R.M.P. were distributed to critical agencies in Puerto Rico among which the most important has been the Puerto Rican Planning Board (Junta de Planificación). The "Junta" serves as the planning and primary licensing agency for federal projects ( A-95 Clearinghouse) while at the same time functioning as the State Clearinghouse for local, state and private projects. This super agency therein effectively reviews all projects done in Puerto Rico. The C.R.M.P. has been disseminated in key offices of the "Junta" and provides an effective and easy to use early warning system for all projects in Puerto Rico.

The C.R.M.P. has also been extensively used by numerous, private organizations such as historical societies, archaeological groups and other professional and amateur communities.

In a view to the immediate future, the visual graphics and format of the C.R.M.P. lend themselves well to presenting the collective cultural patrimony of Puerto Rico to various groups and individuals. The dismembered presentation of the historical resources of Puerto Rico in the past has resulted in a shot-gun approach to funding and public education. The use of the C.R.M.P. in raising state legislative fiscal support as well as its application as a learning tool to the public, has not yet been fully realized, yet holds a great potential for success.

In addition to the C.R.M.P. the state has been actively involved in promoting the field of maritime resources in historic preservation. With the advent of air travel in the last fifty years, an entire generation of Puerto Ricans has grown up with a loss of appreciation of the importance of the sea. The social, economic, cultural, architectural, and genetic development of this island relied exclusively on man's interaction with the sea. The Maritime Preservation focus for Puerto Rico represents a virtually virgin field with an extremely high public involvement.

Another major effort during FY81 was the translation of basic (HCRS) preservation materials. As Spanish is a primary language in Puerto Rico the linguistic difficulties needed to be ameliorated so as to allow greater public participation in H.P.F. programs. This was especially required outside of the urban centers of Puerto Rico. Although major difficulties were encountered as a result of numerous administrative changes at the national level, the viability and necessity of this activity still remains.

In assessing the problems and needs of survey, registration and protection, we will deal with each program element separately.

The problem with survey in Puerto Rico in the past has been the inordinately low level of inventory information available there-in creating a false evaluation of the collective cultural resources extant in the island. As a result of these false premises, a series of detrimental conclusions have long been perpetuated as to the lack of a needed survey effort. What is presently needed is clearly demonstrable evidence of the actual resource potential for Puerto Rico especially so outside of the traditional San Juan Historic Zone (ie. the entire rest of the island). A coherent and systematic survey program must be implemented to resolve these basic problems. The situation is further complicated by the fact that the majority of the work in the past has been restricted to the coastal areas, forming the perimeters of the main island of Puerto Rico. The entire central core, has been grossly neglected due to relative physical inaccessibility in the past. An intensified survey effort in the montaneous interior is sorely needed to balance the present knowledge. One further point which needs to be mentioned is the relative neglect of survey information and efforts in the satellite islands of Vieques, Culebra, Mona and small cays.

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In reference to Registration, the lack of baseline data has impeded the proper weighting of potential areas and properties for National Register eligibility. One cannot separate the problems and needs of registration from those of survey in the case of Puerto Rico. Proper registration cannot be accomplished without basic survey and inventory data to the degree realistically possible today. The immediate and justifiable registration of historic properties is urgently needed to maintain pace with Puerto Rico's economic development without one for the other.

This leads us into the problems and needs of protection which are fundamentally two-fold. Protection as a compliance problem and protection as an enhancement and education problem. The problem of protection hinges directly upon both survey and registration respectively as do the elements of enhancement and education. The needs of Puerto Rico require that the state-wide comprehensive survey functions as an effective planning tool for the use of all projects both public and private. The enhancement, appreciation, and availability of strong traditional cultural ties can also be met through the historic preservation effort. The importance of this focus cannot be underestimated.

The State Historic Preservation Office sees the historic preservation effort as a five-point program which functions in a circular manner. The five points are as follows:

1. Survey and Planning
2. Technical Advice and Inventory Data
3. National Register Nominations (ie. registration)
4. Acquisition and Development
5. Compliance

As stated, this five-point program functions cyclically, however, survey is seen as a fundamental initiation of the entire process. For this reason the focus of Puerto Rico's Historic Preservation Program is towards survey. The initiation, development and implementation of an RP-3 (C.R.M.P.) for Puerto Rico has been more than just on heuristic model. Puerto Rico's C.R.M.P., although not touted to be a panacea, is nevertheless a functioning and dynamic tool which provides the State Historic Preservation Office with a vehicle for a solid and long-range preservation effort.



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Supporting activities for Puerto Rico for FY82 will include an increased survey effort in the mountainous interior range of the island, as well as intensified reconnaissance survey on the satellite islands and cays. A balancing effort in the area of pre-colombian archaeological sites will be coupled with a continuing traditional survey effort in architectural studies. A quantitative and qualitative increase in the C.R.M.P. data will be carried out through these projects including efforts in the coastal zones. Conferences and frequent formal meetings with critical agencies as well as local governments will be carried out to further implement and utilize the C.R.M.P. for planning as well as registration and protection. Organized seminars and conferences for the professional and lay communities will be actively pursued in key areas outside of the metropolitan San Juan area. By use of the geographical division of C.R.M.P. data, the involvement and financial support of local governments will be geometrically increased. As has been the practice in the past, extensive use of mass media programs will be used for educational purposes in all phases of the historic preservation effort.

It is hoped that federal support of these activities continues in the immediate future to serve as a needed catalytic agent in this public program.





BACKGROUND: PHILOSOPHY AND MISSION

A. The South Carolina State Historic Preservation Program completes its twelfth year, and looks forward to its thirteenth, with the same *raison d'etre*, the same basic goals, the same broad philosophy that marked its beginnings in 1969. Its foundations were those of the National Historic Preservation Program, stated first in the National Historic Preservation Act of 1966 and expanded upon in the latest amendments to that Act passed in December 1980; ie, that

- o the spirit and direction of the Nation are founded upon and reflected in its historic past;
- o the historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people;
- o historic properties significant to the Nation's heritage are being lost or substantially altered, often inadvertently, with increasing frequency;
- o the preservation of this irreplaceable heritage is in the public interest so that its vital legacy of cultural, educational, aesthetic, inspirational, economic, and energy benefits will be maintained and enriched for future generations of Americans;
- o the increased knowledge of our historic resources, the establishment of better means of identifying and administering them, and the encouragement of their preservation will improve the planning and execution of Federal and federally assisted projects and will assist economic growth and development;
- o although the major burdens of historic preservation have been borne and major efforts initiated by private agencies and individuals, and both should continue to play a vital role, it is nevertheless necessary and appropriate for the Federal Government to accelerate its historic preservation programs and activities, to give maximum encouragement to agencies and individuals undertaking preservation by private means, and to assist State and local governments and the National Trust for Historic Preservation to expand and accelerate their historic preservation programs and activities.

B. The State Historic Preservation Program is administered by the South Carolina Department of Archives and History, whose director is designated and appointed by the Governor as State Historic Preservation Officer and whose responsibility it is to maintain a professionally qualified staff to carry out the following mandated responsibilities:

1. Direct and conduct a comprehensive statewide survey of historic properties;
2. Maintain a statewide inventory;
3. Nominate eligible properties to the National Register of Historic Places;
4. Prepare and use a comprehensive statewide preservation plan;
5. Administer the state program of Federal grant assistance for historic preservation;
6. Advise and assist Federal and State agencies and local governments to carry out their historic preservation responsibilities;
7. Cooperate with the Secretary of Interior, Advisory Council on Historic Preservation, and other Federal, State and local agencies/organizations/individuals to ensure that historic properties are taken into consideration at all levels of planning and development;



8. Provide public information, education, training, and technical assistance.

## 981 IN RETROSPECT

SURVEY: The survey program began implementation of a two-faceted approach, to do either reconnaissance level or intensive survey in all 46 South Carolina counties. In FY 81, these surveys were expanded into 24 counties and included a combination of small towns, larger cities and urban areas, and rural areas. One accomplishment was the re-survey of an existing district, Abbeville Historic District, placed on the National Register in 1972 through the State Historic Preservation Program. Abbeville has received Department of Interior survey and planning and facade rehabilitation grants for the commercial area, sparking much local interest in historic preservation. This has led to an increasing number of tax act certification requests. In order to process these requests, it became obvious that a complete updated inventory was needed for the historic district area. In FY 81, the State staff's three-member survey team and the regional historic preservation planner completed intensive level re-survey of the historic district and the incorporated area of Abbeville, recording 470 properties. The district is presently being re-defined.

In addition to the county reconnaissance and intensive survey work; survey staff have been responsible for the management of S&P grant-funded surveys of two urban areas of S.C.: Kingstree, the small county seat of a rural county, and Greenville, the second largest urban area in the State. The careful administration of these surveys, which was conducted according to Archives and History's survey standards and methodology, was, it is hoped, a major step in initiating more consultant surveys.

REGISTRATION: On hold for most of FY 81, pending the writing and approval in Washington of new regulations required by the December 1980 amendments, has been the submission to Interior of nominations for privately owned properties; however, the National Register staff has continued to review and process nominations for presentation to the State Board of Review after the new regulations go into effect. Not yet submitted but prepared in FY 81 have been 33 nominations, including 8 historic districts and 4 multiple resource nominations. The State Board of Review, composed of professionally qualified individuals meeting standards set forth in 36CFR61, held two meetings during the year -- the January meeting was announced before the freeze on government regulations, and a meeting in August considered nominations for buildings publicly owned. An unusual backlog of completed nominations will necessitate several Review Board meetings as soon as regulations are announced.

The staff has continued attempts to increase in the National Register the number of properties associated with black South Carolinians. Since it was believed that many properties associated with black history had not been identified, several steps were taken in FY 81 to locate such properties. These included a newspaper article describing National Register properties in the state associated with black history and a letter to appropriate citizens throughout the state requesting information about properties.

It should be noted that two black educators, both women, have important roles in South Carolina's State Historic Preservation Program. One, who serves as Chairman of the Archives and History Commission's Historic Programs Committee (which has jurisdiction over the State Historic Preservation Program) is coordinator of Ethnic Studies for the Charleston, S.C., County School District and wrote and field-tested The Ethnic History of South Carolina; South Carolina's Contributions to American History. The other, who is on the State Board of Review, is Academic Dean and Professor of History at Morris College, Sumter, S.C., and her dissertation was on The American Negro and American Nationality: Concepts of American Nationality.

The concern that National Register nominations be processed and presented to the Review Board in a fair and systematic order that takes into account the significance of each property has led this year to formulation of a new statewide priority list. As a first step

st fall, visits were made to properties listed as regional National Register priorities. These regional lists had been compiled by Regional Historic Preservation Planners and (ir citizen advisory committees.) The State staff has also formulated a ranking system for evaluating potential National Register properties. The list which is made using this ranking system will determine the order that nominations are presented to the Review Board.

Important to the increased efficiency of overall program operation has been the Register staff's planned involvement in aspects of the state program other than processing nominations. A member of the Register staff accompanied the Survey staff on each field trip, and special efforts were made to visit areas and inspect properties likely to be affected by federally licensed or funded projects so that the Environmental Review staff might be advised about the potential eligibility of such properties. In addition, the Survey and Registration staffs jointly supervised work accomplished in several Survey and Planning grant-funded projects.

GRANTS-IN-AID: During FY 81, the grants staff administered 60 Acquisition and Development grants from previous fiscal years and 27 Survey and Planning grants. This involved seeing that all Federal regulations were met and all required documentation was on file, plans and specifications reviewed, pre-construction conferences held, and technical advice provided during all phases of all projects.

Grant projects administered during FY 81 included:

- 7 facade-rehabilitation projects consisting of 93 properties
- 3 facade-rehabilitation plans
- 4 archeological studies
- 5 town and building renovation and revitalization plans
- 2 feasibility studies
- 25 building rehabilitations
- 20 building renovations
- 3 building and structure restorations
- 5 building stabilizations
- 3 surveys and National Register nomination plans
- and a statewide network of 10 regional historic preservation planners.

Three major accomplishment areas of FY 81 were the facade-study and facade-rehabilitation programs in South Carolina downtown communities, the adaptive re-use of historic buildings, and the minority-related projects.

During the 1981 fiscal year, the S.C. SHPO office administered historic preservation grants for facade rehabilitation in: Brookland-Cayce, Historic Charleston, Beaufort, Chester, Mnettsville, and Marion. The South Carolina Department of Archives and History believes that the facade grants have been a key to revitalization in central business districts of these towns and cities.

Adaptive re-use for historic properties has been a priority 1981 goal for South Carolina's State Preservation Program, increasing to 15 the number of acquisition and development grants that have resulted in successful adaptive re-uses of historic properties. Outstanding among such grants administered this year were the AIA Cottage in Columbia adapted for office use, the Elizabeth White House in Sumter useful now as a gallery and art sales shop, the Cayce house adapted for use as a community center, and Lancaster Presbyterian Church now used as an auditorium facility.

Recognizing the contribution minorities have made to South Carolina's development, state historic preservation grants have funded the Morris College Black History study to gather data on historic sites related to black history in the Santee-Lynches region of South Carolina and the Penn Center Study to develop plans and specifications, realistic adaptive re-use ideas, and a maintenance schedule for converting the black rural school complex into a convention



center for small groups. One of South Carolina's two 1981 Acquisition and Development grants approved before the Administration's rescission of 1981 funds will help provide the funds to begin the Penn Center renovation project. Other on-going minority-related projects include the renovations of Bethlehem Baptist Church, Mt. Pisgah AME Church, and St. Stephens Episcopal Church.

D. PROTECTION: Several major environmental review projects that have been ongoing or that originated during the past year include:

1. The Charleston Center: This involves the construction of a major convention center and hotel in downtown Charleston, in the Old and Historic District. Our office has worked with the City (representing HUD) in carrying out the stipulations of the Memorandum of Agreement. Intensive archeological testing and data recovery have been initiated; design plans have been commented on, and details for retrieval and storage of significant architectural details have been worked out.
2. Murrells Inlet: This case is still ongoing as the fiscal year closes. It involves dredging and the construction of a marina whose facilities would include 40 boat slips, 200-capacity restaurant, parking lot, and a fish processing plant in the middle of a residential Historic District. The SHPO and Army Corps of Engineers having failed to reach an agreement on effect of the project, an on-site inspection and public information meeting has been held, as stipulated in the 36CFR800 regulations; and in July an Advisory Council panel, holding a two-day meeting in the area, recommended that the Corps deny the permit for dredging that would result in marina construction.
3. Richard B. Russell Reservoir: The creation of a major reservoir on the Savannah River falls under the jurisdiction of the Savannah District Army Corps of Engineers. Working with Georgia and South Carolina, the Corps has undertaken major archeological mitigation, a HABS survey of standing structures and engineering structures, and studies of the environmental aspects of the Savannah River Valley.
4. Palmetto Center: Using UDAG funds, the City of Columbia is bringing to fruition plans to construct a major hotel-convention center complex in downtown Columbia, visually affecting National Register structures and directly affecting the Palmetto Building, an ornately decorated early 20th-century skyscraper listed in the National Register. Working cooperatively with concerned citizens and the State Historic Preservation Office, Columbia City Council has been successful in reversing the original decision to demolish so that the landmark building will be preserved and used in situ. This is an outstanding example of municipal sensitivity to the historical environment in a situation of economic necessity for downtown revitalization, and of effective successful cooperation between a city government and the SHPO.
5. FmHA-Assisted Housing Project: The Farmers Home Administration has proposed to finance construction of a housing project in the Cheraw Historic District, which is included in the National Register. Careful consultation and coordination has occurred between FmHA, the SHPO, and the Advisory Council for more than a year, and a Public Information meeting has been held. After lengthy delays, a Memorandum of Agreement was signed by FmHA, the Advisory Council and the SHPO to mitigate the adverse effect, chiefly through design and site plan revisions to bring about compatibility with the district.

One by-product of environmental review has been to work with the Federal Highway Administration and the South Carolina Department of Highways and Public Transportation in initiating a survey of metal truss bridges in the State. This project is now coordinated by our Survey Division, but received initial input from the Preservation Protection and Planning Division.

We have had 180 requests for Section 106 comment during the past year. The cases cited above have been among the environmental review highlights.

**1. PUBLIC INFORMATION/EDUCATION/TRAINING:** During the fiscal year our Historical Services Program for public and technical information processed 1,545 new slides for the AV library (total: 8,000), developed/proofed 547 rolls of B&W film, and made 1,796 B&W prints, the majority of which were to augment information on the state's historic preservation program. Fourteen agency-sponsored (or agency-related) events were photographed, 22 slide-oriented presentations prepared (of which 17 were specifically preservation-related), and three preservation-related special exhibits designed and installed.

One special public-oriented publication project -- based on the earlier grant-funded Ashley River Conservation and Recreation District study -- was planned and produced, in full-color, to be distributed at a later date in conjunction with a seminar on the topic in FY 82. One hundred and twenty-six news releases directly related to historic preservation appeared almost 2,000 times in newspapers around the state. Observances of 1981 National Historic Preservation Week included special media coverage, mailing and publications. Conferences sponsored during the year dealing with historic preservation included the Appalachian regional Archives and History conference in Greenville and the 17th Annual South Carolina Landmark Conference in Georgetown.

The Department's eight-page quarterly, The New South Carolina State Gazette, circulated to a readership of approximately 10,000 as the major preservation-oriented publication in the state and regularly included information on the National Register of Historic Places, the historic sites survey, Tax Act certification and rehabilitation standards, etc. The Bulletin of Historical and Technical Resources, a monthly publication of the South Carolina State Program's technical information services, discussed topics across the spectrum of preservation and conservation. Appearing in the Bulletin was preservation and technical information drawn from the ongoing data bank which is compiled, organized, indexed, and filed by the technical information specialist as a resource for the South Carolina preservation constituency. During FY 81 almost 2,000 requests for technical information were processed, researched, and answered and preservation-related legislation and regulation information was kept up-dated.

Staff support services were provided to the Confederation of South Carolina Local Historical Societies, an important liaison and network through which the State Historic Preservation Program reaches South Carolina citizens. In addition to the Landmark Conference co-sponsored with the Confederation, another major conference produced by the South Carolina staff was the Southeastern State Historic Preservation Officers' annual meeting in Columbia during August. Representatives from SHPO offices and other NPS offices from all 10 states and territories, as well as Louisiana, attended. In addition, historic-site-related activity included texts written and documented for 26 official state historic markers erected this year and six major Bicentennial commemorations coordinated at Revolutionary War sites.

#### 1982 IN PROSPECT

The Historic Preservation Fund authorized by the Congress of the United States and administered by the Department of Interior, provides 50% reimbursement to States to carry out the federally mandated historic preservation program. In South Carolina, the State underwrites the cost of operating the program on the condition that all Federal reimbursements received by Archives and History for doing this work for the Federal government be deposited in the State general fund. The Administration's proposal to slash Federal support of October 1, would immediately jeopardize the State program by which the Department of Interior gets its work done in this State and raises serious questions (at present unanswered) as to whether, or for how long, South Carolina could/would continue a State preservation program.



Since 1969, the S.C. Department of Archives and History, through the State Historic Preservation Office, both entirely State funded, have been at work as a program mandated by Congress. And this work has been done more effectively because we and all the 55 states and territories work together with the Department of the Interior. We are a spectacularly successful example of how national policy can be implemented by the State, in the most economical way.

But the mandated activities specified above cannot be continued by the States alone. The Federal involvement is essential, not only to maintain uniform standards and procedures Nationwide but also to share the financing of the professional State staffs and the operational costs which are necessary for administering the program and for carrying out the requirements of the Federal law. Since 1969, the States have provided all the manpower and half the money to administer the National Historic Preservation Program. South Carolina is willing to continue this arrangement -- since the heritage of our own State, as part of the National patrimony, is involved. But we cannot do it all. If the Federal government stops or severely curtails its participation in the cost-effective, highly productive, decentralized State Historic Preservation Program, it is likely that the State Historic Preservation Program will not long be able to focus on, and accomplish such important goals as, for instance, the survey of nonfederal South Carolina lands projected for extensive development (these would include some of the State's coastal zone and urban redevelopment areas, as well as those that may contain potential National Historic Landmarks). Also considerably hampered by reduced levels of Federal funding (which helps enable and set standards for professional preservation staffs) would be State Historic Preservation Office's capability to assist local governments follow through on their awakening interest in identifying, evaluating, and protecting their unique cultural resources as a means of achieving community revitalization.

Also of great concern to the South Carolina State Program is de-emphasis on development grants and the almost total emphasis on Survey and Planning. In our minds, the actual physical preservation of our visual heritage is our main reason for existence. All the identifying and planning in the world on "how to" preserve our visual history is to no avail, if, in the end, the actual visual evidence is lost. We presently have on file in our office more than 100 requests for grant assistance to restore or rehabilitate historic properties that are listed in the National Register of Historic Places. Without the means and incentives that development grants provide, our program lacks substance, purpose, and the possibilities of accomplishing what we were created to do -- preserve our Nation's historical and cultural foundation as living parts of our community life and development. Without "brick and mortar" monies, we will "plan" our program into a dry and early grave.

Our solution to both inadequate funding and non-funding for development grants will be to raise our voices against what we consider shortsightedness and lack of understanding of our mission and the methods for best accomplishing that mission.

To meet the need for increased public knowledge and public involvement, the work of Historical Services and Information Division will be more important than ever in reaching the private sector.

One thing now being planned is a symposium related to developing an Ashley River Conservation and Recreation District which addresses the area's natural heritage, its history, and the impact of area growth upon these aspects of its environment. With the National Trust for Historic Preservation's Southern field office, we are discussing a series of seminars on setting up local and possibly state revolving funds for the preservation of historic structures. Similarly, there are plans to sponsor a series of Tax Reform Act seminars, along with a state-produced TRA brochure for the information of individuals and corporations interested in taking advantage of specific tax breaks on historical structures meeting the requirements of the Act.

A series of pamphlets explaining South Carolina's preservation program is also being planned -- to focus upon various specific aspects of the program: National Register of Historic Places, the survey of historic places, the protection and development of historic places.

With regard to technical information, the division's Bulletin of Historical and Technical Resources, with a limited circulation to those specifically interested in the subject, will be continued -- and circulation will probably be boosted about ten or fifteen percent.

Division staff will continue to assist and coordinate materials for preservation-related programs and talks made by section staff, as in the past, as well as produce news releases on the National Register, survey, TRA, and the preservation program in general -- augmented by radio and television spots and special observance of National Historic Preservation Week.

In view of the serious preservation funding situation, plans are to explore a "consortium approach" to historic preservation -- involving the State Historic Preservation Program, the National Trust, other governmental agencies, and the private sector, in utilizing their combined energies toward the preservation effort in South Carolina. An important facet of this approach will involve working closely with the University of South Carolina's Applied History program and with other colleges and universities, and a possible expansion of the Confederation of South Carolina Local Historical Societies to include individual as well as organizational members.

While the above points cause and/or relate to ALL of our problems and needs, we offer the following specifics in regard to each of the three program elements:

SURVEY: South Carolina's survey program at present faces three major problems: (1) the need to complete intensive inventories of historic districts placed on the National Register prior to 1976; (2) the loss, due to funding difficulties, of approximately half of the ten regional historic preservation planners who had, since 1971, assumed part of the responsibility for survey and for locating and maintaining local contacts; and (3) the need to organize and implement a computerized indexing method for survey data storage.

Formation of the survey 1982 work program will address each of the three problems. To meet the need for inventory data on existing historic districts, South Carolina intends to complete the re-survey of two early historic districts (Town of Winnsboro, Fairfield County, and Pendleton Historic District in Pickens and Anderson Counties), and to initiate re-survey of Old and Historic Charleston District, an area which is experiencing a heavy volume of requests for tax act certifications. A program of gradually re-surveying these early existing districts also fulfills our mandate to update and maintain our inventory. The loss of some regional preservation planners will increase survey fieldwork demands on existing staff. However, over the past year, State staffs have already assumed greater responsibility for survey work in each region of the state, and anticipate continuing this process. The loss of regional planners will primarily affect the State Preservation Program by placing on the small central staff the burden of initiating and maintaining local contacts for assistance during survey fieldwork and historical research. To meet this need, survey staff intends to work more closely with the Archives liaison to local historical societies, and to increase publicity to elicit public support for the survey effort. Staff anticipates a portion of this additional survey work may be alleviated by the utilization of additional S&P grant surveys, such as those in Kingstree and Greenville, which are conducted in accordance with our standards and under our direction. To meet the need for computerization, staff hopes to continue work begun during FY 81 to devise a format for transferring survey data into the Archives SPINDEX II computer system. This need is a priority in terms of managing in-house survey data and will necessitate re-ordering some survey priorities.



**B. REGISTRATION:** One of the major problems confronting the Register staff has been the quality of many of the nominations received from sources outside the professional State staff. In response to the need for educating those who write National Register nominations the State staff has spent much time in FY 81 writing instructions for completing National Register nominations. The first pamphlet entitled "Instructions for Completing National Register Multiple Resource Nominations in South Carolina" was finished in the spring and distributed to Regional Preservation Planners who are working on multiple resource nominations; in FY 82 they will be available to give to consultants, and to citizen volunteers. In addition, a draft of a National Register Manual for South Carolina, containing detailed instructions for preparing individual nominations, has been completed and will be available for distribution. It is hoped that these two publications will improve the quality of National Register nominations received for review.

From 1971 on, the State Preservation Program has contracted with the Regional Council of Government to help carry out preservation activities in all regions of the State. These agreements included the preparation of National Register nominations. Now that some of the Councils of Government are finding it necessary to terminate their preservation programs, the State staff will have to make provisions for carrying out National Register work in the regions that will not have Planners.

Since it would be impossible for the three-person National Register State staff to take over all research, writing, and field checks of National Register nominations in areas without planners, it is hoped that the National Register Manual will enable interested citizens to prepare nominations for review by the State staff.

Faced with a situation which points up the immediate need to increase public knowledge and understanding of the National Register program, the staff plans to prepare a National Register brochure that will include a brief explanation of the program as it is administered in South Carolina and photographs of representative South Carolina National Register properties. The staff also plans to continue work on a catalog which will list all South Carolina National Register properties.

**C. PROTECTION:** Under the National Historic Preservation Act of 1966, Section 106, the State Historic Preservation Office is required to comment on the effect of federally funded or licensed projects on the historic environment. Under this law, we are called upon to review and comment to Federal agencies hundreds and hundreds of times about the effects which their projects might have on archeological and/or historic sites. Our participation is required by Federal law and regulations. If the Federal budget for historic preservation funding to the States is stopped, or drastically cut, the States will have to do this job free for the Federal government, or the Federal government will have to take on the job itself (not only in South Carolina, but in each of the 55 states and territories). Bluntly put, this State is in no position to assume Federal responsibilities and programs without Federal reimbursements.

Many, many federally-assisted projects which originated in FY 81, or earlier, still involve our staff review and assistance, and a number of these can be expected to continue for a period of years. These include the Charleston Conference Center (in which a Memorandum of Agreement legally binds this office to provide specific services at some 23 points throughout the term of the compliance contract). It is of great concern as to how the federally mandated responsibilities can be carried out in the States without the assistance and participation of the SHPO, enabling federal agencies to proceed with their projects and allowing the use of Federal funds to assist projects in South Carolina.

State budget and personnel constraints are contributing to another of this state's protection difficulties -- serious understaffing in our environmental review and compliance staff. For eight months during FY 81, the staff archeologist position has not been filled as part of the Department's compliance with a state-mandated 7% reduction in force. The

ling of this position is mandatory if the South Carolina program is expected to be able handle its heavy and complicated review responsibilities.

Attention is also being given to further refinement of the in-house environmental review tracking-and-handling system and to increased environmental review assistance from staff in the other program areas -- ie, survey, registration, grants, technical assistance, and information.

The lack of understanding -- and in some cases lack of cooperation -- on the part of Federal agencies about the 106 requirements and procedures bearing upon them and their applicants continues to plague the system and to cause unnecessary delays in Federal project funding and permitting. In recent months the South Carolina Governor's Office has become acutely aware of such problems and their effects on industries coming into the State. Plans are being discussed by which the State (through a cooperative working together of the Governor's Office, Development Board and State Historic Preservation Officer) can provide clear and helpful information to prospective new industries at the earliest possible planning stages about Federal environmental review requirements.

Tax Act review, a time-consuming process demanding technical knowledge and experience, is another responsibility of the State's Protection program, which is proving to be a time-consuming burden on an already overloaded staff. More than 80 commercial rehabilitations of National Register properties have been reviewed for Tax Act benefits to South Carolina citizens generating some \$10 million dollars in private investments. With little or no Federal support in FY 82, South Carolina will either have to provide this service free to citizens who wish to benefit from these special federal tax advantages, or the Federal Government will have to take it over. The actual number filled in on the grantee minimum requirement blanks in no way reflect the amount of time or the complexity of staff involvement in advising private citizens, architects, and contractors concerning the Secretary's standards for Rehabilitation in order to qualify for tax act benefits. Each completed certification represents a multi-step process, including study of plans and on-site inspections.









## PROGRAM OVERVIEW

## Accomplishments FY 1981

During FY 1981 the accomplishments of Tennessee's Historic Preservation programs were remarkable when considered against the backdrop of circumstances. Because Tennessee's FY 1981 work program was unapproved when unobligated FY 1981 funds were rescinded Tennessee lost most of its HPF funding. This resulted in severe limitations on our ability to achieve certain objectives, particularly in the area of survey and in the area of protection and enhancement of properties by grants-in-aid activities. In spite of this or because of it Tennessee has had to begin the search for innovative ways to meet its preservation objectives. Some accomplishments which have resulted and which we feel are noteworthy are as follows:

1. In the area of survey the first successful attempt was made to accomplish survey using donated labor. A rural Middle Tennessee county (Stewart) was surveyed using volunteers and CETA workers from the Mid-Cumberland Human Resources Agency. Surveys in past years using volunteers had uniformly proved unsatisfactory. However on this occasion the survey which resulted was highly successful, well conducted, and comprehensive. The success was due we feel to extensive training and follow-up supervision by the THC staff and to the enthusiasm and competence of the volunteers and the project's director. The project was conducted as a YCC project and participants were all youths age 16-19. All salaries and travel expenses were paid for by YCC, with the THC covering costs for maps, survey forms, film, and processing. The survey involved approximately 12 students who recorded 800 properties in a county of 470 square miles. It is our intent to explore and we hope develop further this method of accomplishing survey.
2. Another accomplishment in the area of survey which is significant is the Tennessee Department of Transportation's initiation of a bridge survey. At the urging of this office TDOT is systematically reviewing all highway bridges in the state, developing criteria of significance and in consultation with the SHPO staff selecting significant bridges for nomination to the National Register or determination of eligibility. This effort will prove highly useful in planning for the replacement or rehabilitation of bridges across the state.
3. A third accomplishment in the area of survey involves archaeology. Anticipating steadily increasing pressure on cultural resources, particularly archaeological, from surface mining activities, the THC in FY 1980 initiated a contract survey of representative coal bearing areas of the Cumberland Plateau. This survey was completed in FY 1981 and is providing the first real data base for developing predictive models useable in assessing possible impact of proposed surface mining activities. It will also provide the basis for the initial phase of the development of RP3 for these kinds of resources. This accomplishment therefore spans the areas of both survey and protection.



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4. In the area of protection a significant accomplishment has been the drafting of amendments to Tennessee's Historic Preservation Zoning enabling legislation. The current enabling legislation is several years old and while it is basically adequate it was felt that it was lacking in clarity and specificity necessary to assist jurisdictions in drafting ordinances which would be the optimum in effectiveness and consistency. The vagueness of the enabling legislation, the wording of which has been adopted by many communities verbatim, has often left the historic zoning commissions which were established to flounder in such areas as criteria for designation of districts and in design review guidelines. The proposed amendments which will be introduced in the next session of the state legislature (January, 1982) are intended to remedy that and also to result in enabling legislation which will ensure that local ordinances passed under its authority and districts subsequently established, will be certifiable under tax act regulations.

5. Though the lack of grant funds prevented any new A&D projects from being initiated during FY 1981 some worthwhile accomplishments were attained with prior year funds. Among these were the Springfield Square A&D grants which resulted in the facade restorations of 5 buildings in this district, one-half of one side of the town square. The high visibility and the favorable public reactions, and the media attention devoted to this project have made it an exemplary case of the use of grant funds for the effective promulgation of a preservation ethic. The completion of the Etowah Depot project with its dedication on July 3rd has also had similar results.

6. With the continued diminution of grant funds, Tennessee is relying more and more on the private sector, stimulated by the tax incentives to provide funds for protection and enhancement of historic resources. We feel that this program in our state has been highly successful. It has resulted during FY 1981 in the investment of over \$ 23,847,320.00 in the preservation of historic resources in Tennessee. The premier example of the success of this program is the successful renovation of the Hermitage Hotel in Nashville.

## Problems, Needs, Activities, FY 1982

The problems which the THC has faced in the past have usually involved technical problems of methodology for achieving certain objectives. These problems and needs remain but have been superceded by the greater problem of how to continue to pursue objectives with continually shrinking funding and resources. The critical need therefore is for either the level of support for this program to be stabilized at an adequate level or for methods to be found to achieve objectives which require little or no governmental funding. The uncertainty experienced over the last year concerning the future of the federal historic preservation program and the drastic cut in Tennessee's FY 1981 funds resulted in a large reduction in the amount of survey accomplished in FY 1981 as compared to FY 1980. In FY 1980, 7300 properties were recorded and 2180 square miles were surveyed. In FY 81 the comparable figures are 1662 properties and 910 square miles. To counter the level of lessened governmental support for preservation which is being felt on both the state and federal levels, the THC is seeking support for survey activities from non-governmental sources

and from governmental sources whose programs are not primarily focused toward preservation but whose aims may also be compatible with preservation objectives, e.g. youth training programs. The THC also intends to begin seeking support from local governments for survey activities. This seems to be particularly appropriate since local governments and communities often are the prime beneficiaries of survey activities. Non-profit community improvement organizations such as Chambers of Commerce are also being approached for support with some success.

The problem of decreasing financial resources allocated for survey activities is compounded by the ever increasing need for the data produced by survey. Survey provides the basis for all compliance review and planning decisions. Development activities in Tennessee are proceeding rapidly despite the downturn in the economy. Areas with coal and other mineral resources are facing tremendous pressures for development with great destructive potential for cultural resources. The construction by Nissan of a huge new truck assembly plant near Nashville will have great impact on the cultural landscape of the midstate region. The completion within a few years of the Tennessee-Tombigbee Waterway will pose a similar situation for the western Tennessee Valley. The increased development pressures on CBD resources caused by continuing high energy prices and the resultant trend away from the suburbs for commercial developments offers great opportunities as well as problems. Due to the advantages restoration and rehabilitation currently have over new construction, especially since the passage of the improved tax incentives this current year, opportunities excel for the preservation and reuse of many resources which in the past would have been almost certainly demolished. In coming years literally hundreds of decisions affecting cultural resources are going to be made by planners, government officials, real estate developers, and preservationists. If these decisions are to be made in the best interest of Tennessee's cultural resources without unnecessarily impeding development, they must be based on the data which the survey will provide.

In the area of registration funding shortages and cuts have also caused problems. For example, the loss of substantial FY 1981 funding has resulted in the loss of the three regional planner positions which the THC had managed to establish in cooperation with three regional councils of government. In addition, the loss of local funding support resulted in the loss of a preservation planner in Chattanooga. These persons had been significant factors in Tennessee's efforts to deal with the demand for National Register nominations from the public. Also, they were very important in providing input concerning the establishment of priorities for registration. These positions were also very useful in the dissemination of information and instruction to the public concerning preservation matters. The loss of these positions has therefore been a serious setback to Tennessee's efforts, hitting hardest at the registration element. The loss has greatly increased the burden on the SHPO staff in preparing nominations and has substantially lessened services to and contact with the public and local governments. Because of the increased demand for the preparation of nominations and the anticipated further increase from those seeking benefits of the Economic Recovery Tax Act of 1981, the staff must continue its priority on preparation of districts, thematic groups, and multiple resource nominations. Emphasis will be placed on nominating central business districts and urban fringe areas experiencing rapid growth and development. This



approach also derives from an effort to coordinate as closely as possible survey, registration and protection as these areas are facing high development pressures as pointed out earlier and also contain large numbers of properties which are potential tax incentive projects.

In an effort to relieve the demand on staff time for individual nominations from the public the THC will increase its efforts to provide training and instruction to allow local government staff persons and private citizens to improve their capacity to prepare completed and acceptable nomination forms. The staff will update and expand guidelines for preparing nominations for use by volunteers, planners and consultants in a detailed "how to" information packet. Also, in the plans for next year is the sponsorship of a statewide preservation conference. This is felt to be especially appropriate due to the increased emphasis to be placed on the role of local governments by the Historic Preservation Act Amendments of 1980. Sessions now envisioned concern the registration process, completing nomination forms, and identifying, evaluating, and protecting cultural resources.

A very frustrating problem for Tennessee has been caused by the delay in the issuance of the National Register owner notification regulations resulting from the administration's freeze on new federal regulations. The effect of cancellation of a state review board meeting in FY 1981 caused by the freeze, has been one of confusion and discontent among owners of properties which were nominated. A second effect has been the possibility of the review board being faced with a huge number of properties to be considered when the regulations are issued and the freeze lifted. This will obviously make difficult a fair assessment of the eligibility of properties as it will inevitably cause the consideration of each property to be accomplished with unaccustomed haste.

The actual resolution of this problem is beyond the scope of the state's abilities as it requires federal action. However, the state has attempted to deal with it by continuing to prepare nominations for processing when the freeze is lifted and by holding one session of the review board for review and discussion only. This one session was also able to review and pass for nomination one building which is owned by a public agency.

In the area of protection the review and compliance procedures have continued to work well in Tennessee. The level of cooperation from most agencies remains high. As the level of understanding of the 106 compliance process among federal agencies becomes higher the compliance process becomes progressively more efficient. This has especially been the case among agencies with which the THC has had the most frequent contact such as the Tennessee Department of Transportation, TVA, and the Corps of Engineers. The same has been true to a lesser extent of such agencies as community development offices.

A potential problem which is expected to arise over the course of the next year or two is the necessity for dealing with the planned shift from categorical federal grants to block grants. This may shift responsibility for compliance responsibilities from agencies with whom THC has been dealing to new agencies or institutions who have had no experience with compliance procedures. This

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will require a major new effort on the part of the review and compliance staff in educating these new agencies regarding their responsibilities.

During FY 1982 Tennessee hopes to carry further its development of the RP3 process. Steps in developing this process during the upcoming year include the division of the state into culturally relevant physiographic zones, an assessment of the known distribution of resources within those zones, and an examination of variables useable to predict the occurrence of properties in unsurveyed areas.

In the area of protection and enhancement by the use of grant assistance, efforts have also been affected by the lack of funds. No new Acquisition and Development grants were made in FY 1981 and none are anticipated in FY 1982. Funds were rescinded in FY 1981 and FY 1982 funds are expected to be inadequate to carry out an A&D program which will have a significant impact. Therefore, in view of the considerable demand on staff time that even a small grant program makes, Tennessee has decided to devote the time of its technical preservation staff to promoting, encouraging, and assisting in the use of the tax incentive program by private developers. A potential problem in this is the possibility that success in these efforts will result in such a growth in demands for assistance, advice, and review of projects that the technical preservation staff of the THC will be overwhelmed resulting in delays and other problems for developers of historic properties.

Though Tennessee has decided this year to eschew an A&D grants program this should not be taken to mean that we do not feel that an A&D program has value. When adequately funded an A&D program has proven to be a very valuable means of attracting public attention and support for preservation. The restoration of a deteriorated historic building demonstrates more effectively than any other means the potential which exists in historic buildings. The lack of A&D programs will deprive state offices of a valuable tool for building a preservation ethic.

One need which the THC is continually trying to discover new ways to meet is the need to increase the involvement of minorities in historic preservation activities. In the past the THC has involved minorities (in Tennessee the largest and most historically significant minority is the black population) by funding A&D projects and through funding a survey project to locate and identify potential NR properties associated with Black History. We have not however, we feel, had an effective outreach program to encourage interest and support for preservation among minority communities. This year we hope to explore ways to begin such a program and as a first step we plan to seek a meeting with several local black historians to receive suggestions. A possibility we will also explore in the future is a conference focusing on black history and its potential relationship to historic preservation.

The activities outlined above which we intend to carry out in an effort to meet the needs and cope with the problems which we see facing us represent what is, in Tennessee's opinion, the minimum necessary to continue progress toward the goal of preservation of Tennessee's cultural heritage. We hope that we are able to go beyond this minimum and expand our level of activity. Our ability to do this will depend on the level of support that is received from the state



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administration. It is our intention to seek this support based on our conviction that public dollars invested in preservation return, on the average, as high or higher return in terms of benefits than any public investment other than education. Therefore, regarding the future we are guardedly optimistic.





During FY 81 the survey and registration elements of the Virgin Islands historic preservation program proceeded at a good pace. The island of St. John, which is still the least developed of the three major islands, was the focus of the first phase of an historic structures inventory. More than half of the privately owned land area of St. John, (excluding the land owned by the National Park), was surveyed at a reconnaissance level for historic structures, and most of that same area was also inventoried at an intensive level, with nomination level information being gathered on new inventory forms for historic buildings such as plantation ruins and wooden cottages. This effort resulted in a nomination submitted during FY 81, with six more individual property nominations to be submitted during FY 82. The second phase of the St. John inventory is planned for completion during FY 82, as an important supporting activity for the survey and registration goals.

Another highlight of FY 81 for survey and registration was the archaeological site inventories of St. Thomas and St. John. Each location from which any artifact had ever been reported was visited, as well as some additional locations. Information on the sites' materials and conditions and on the surrounding environment was recorded on new archaeological inventory forms. The effort resulted in much more complete site files, site and island-wide maps, and clarification of a few misconceptions. Two new sites were also recorded.

Although the Charlotte Amalie Historic District was accepted to the National Register in 1976, most individual structures within the district had not been recorded. During FY 81, with the help of summer interns, a street-by-street recording effort was begun and the first phase, including about half of the district area, was completed. Using new inventory forms and uniform definitions and instructions printed in the office's FY 81 publication Source Book for Buildings and Structures, data were gathered for each building at a level that would have been sufficient for nomination of the individual buildings. The second phase of this registration project is planned for FY 82.



As has been mentioned, a complete set of new inventory forms and a survey reporting form were produced. These have contributed to more uniform recording of archaeological and historic properties and will contribute to uniform data recording in areas surveyed under the territory's survey strategy.

Before leaving the topic of survey and registration, it must be mentioned that community volunteer help was a major thrust of our program in FY 81, and the effort was well rewarded. Many activities, such as public talks, school lectures, workshops for members of historical societies, distribution of posters, and printing of the Source Book for Buildings and Structures, had as their aim the improvement of volunteer help. Volunteers did, in fact, help with much of the survey and registration legwork.

For the protection element, activities were aimed at improvement of other agency participation in the 106 process. By seeking communication at every opportunity and by providing technical assistance in many different formats, improvement in the responses to responsibilities under section 106 were a major accomplishment.

For more specific protection problems, much information was prepared for eventual compilation in a booklet of guidelines for the architectural control districts. Through meetings and site visits, much attention was paid to these control districts in order to slow the erosion of the historic aspects of the towns.

Another integral part of the Virgin Islands protection element is an emphasis on public awareness of historic properties and of the assistance which can be sought from our office. Several accomplishments relate to this area, viz.: (1) a series of orientation and training sessions for students who serve as guides for walking tours of the Charlotte Amalie Historic District, undertaken in conjunction with the Dept. of Commerce and the Youth Commission; (2) preparation and printing of self-guided walking tour brochures for the towns; (3) presentations for taxi tour divers; (4) presentations to school classes and teacher workshops; (5) assistance to the Environmental Studies Program; (6) technical assistance to the 4H Clubs summer programs on St. Thomas and St. John; (7) presentations for the Youth Conservation Corps summer program; (8) walking tours led by staff members; (9) a field and laboratory orientation for high school archaeology students; (10) continuation and expansion of the newsletter "Searching"; and (11) workshops

on the preservation of churches and other religious structures for both St. Thomas and St. Croix.

### Problems and Needs in the Preservation Program

#### **Survey:**

Because one of the ultimate goals of the Territorial program is to have surveyed 100% of the land surface and near-shore area, it can be said that a problem exists in that less than that percentage has been intensively surveyed to date. During FY 82, then, additional survey will be needed. Certain areas of the islands are seeing rapid development, and these are specific problem areas for survey in FY 82: the west end of St. Thomas, the southern shore of St. John, and the east end of St. Croix.

Beyond having surveyed certain portions of the Territory, it is imperative to be able to retrieve information on the nature of various surveys that took place. Although these data are on hand at present, integration with the already-prepared survey strategy and compilation onto maps is needed. This will facilitate assistance to individuals and agencies planning development projects and to agencies charged with overall planning.

Resistance to carrying out or requiring surveys to locate archaeological and historic properties on the part of federal agencies is also a problem, and more compliance needs to be encouraged.

#### **Registration:**

The program element of registration, or deciding which of the historic properties are important, is essential for use in long-range land use and development planning and in the monitoring and checking of development, both of which are now major concerns for the Virgin Islands Government and citizenry. For St. John, the need is to acquire complete inventory data from the southwest portion of the island so that the most important historic properties will be recommended for preservation. On St. Thomas, the need is to single out the most important individual structures and neighborhoods within the Phase II portion of the Charlotte Amalie Historic District by making building-by-building recordings. Preparation of nominations will also single out specific properties most worthy of preservation. In recording data on these buildings and structures, there is a need for additional information from historical literature, since most of the data gathered this year were field data.

For registration of archaeological properties, the most pressing need is to evaluate the recorded site locations on St. Croix, since St. Thomas and St. John were completed in FY 81.

Lastly, a significant need related to the registration element is to continue the involvement and training of non-staff volunteers and temporary interns. Experience over the last year has shown that volunteers can provide impetus to a program, so that a problem of insufficient staff for a large work load can be partly overcome through active recruitment and training of volunteers.

#### Protection:

the protection element relates closely to the importance of tourism in Virgin Islands economy. A large segment of Virgin Islanders derive their living from tourism-related businesses and most enjoy benefits stemming indirectly from tourism. Historic preservation in the Virgin Islands contributes by aiding the protection of those properties that help to impart the very historical charms that many visitors appreciate. In conjunction with other parts of the local government, one of the responsibilities of the Division is to promote historic preservation as not only socially beneficial in preserving a sense of heritage but also as economically beneficial for the community in general and often for the specific property-owner as well.

During FY 82 the Division will need to increase public awareness of the opportunities and benefits of historic preservation and to improve use of Tax Act benefits.

In the coordination of historic property protection with other agencies and planners, there is a need to make inventory information more compact and clear to agency users and to realize further improvement in 106 compliance.

(Since the Territory does not have local governments, the national priority of authority transfer to local governments is not applicable.)



## Supporting Activities Which Address These Needs

### Survey:

To meet the need for additional survey, the second phase of the historic structures survey of St. John will be undertaken. Portions of St. Croix will be surveyed in the course of an archaeological site inventory project on that island. Promotion of the volunteer program will be continued in order to meet the survey need. Permit applications, such as local CZM permit applications, will continue to be monitored, and surveys will be conducted or arranged for unsurveyed properties, with particular attention to developing areas with high historical or archaeological potential and to the areas mentioned under the "needs" section.

To meet the need of easier survey information retrieval, compilation of previous survey information onto appropriate maps will be undertaken.

To encourage federal agencies to locate historic properties on land under their jurisdiction and on lands which they may be affecting, consultations, information, and technical assistance will be provided to other agencies at frequent intervals.

### Registration:

To meet the need of recording historic structures on St. John, Phase II of the St. John inventory will be carried out in FY 82. To single out the significant structures within the Charlotte Amalie Historic District, Phase II of the building-by-building inventory will be carried out. The need for identification of important properties on all three islands will be met by preparation of six individual nominations for St. John and six for St. Croix, along with a multiple resource nomination for St. Thomas (Frenchtown), a district nomination for St. Thomas (Sub Base), and a thematic nomination for St. John (wooden cottages). To gather additional historical data to supplement the field data, a literature survey for historical references, particularly from the old newspaper Tidende, will be undertaken.



To meet the need of evaluating archaeological sites on St. Croix, an archaeological site inventory of St. Croix will be undertaken, with site inspections and recording of materials, context, and environment, preparation of maps, and distillation of general-audience text.

The need to augment staff with volunteers and interns will be met by providing workshops for volunteers, summer interns, historical and archaeological societies, and government agencies; by continuing to promote the internship program in the newsletter and in public media; and by reprinting the inventory manual Source Book for Buildings and Structures for use by volunteers and trainees.

#### Protection:

To increase public awareness of historic preservation the Division will embark on a more active public awareness program. Specific aspects of the program will include school presentations, preparation of slide-show packages, training for taxi tour drivers, radio and television spots, and a poster series for St. John.

To increase use of the Tax Act, a Tax Act promotional campaign will be undertaken, with information disseminated through public speaking and the newsletter. To improve the quality of work done under Tax Act benefits, a workshop for builders and contractors will be held.

To improve the coordination of protection responsibilities with other agencies, archaeological sensitivity maps will be prepared and issued with appropriate planning-oriented text. Technical assistance will be given to governmental agencies. A workshop specifically covering the 106 process will be held for governmental agencies.















