



## PORT CITY PRESERVATION

September 25, 2012

Michael J. Auer  
NPS Heritage Preservation Services  
1849 C Street, NW (2255)  
Washington, DC 20240

Re: 1-24-0009, Historic Preservation Application - 36 CFR Part 67

Dear Mr. Auer:

Port City Preservation LLC is pleased to submit our comments to the Proposed Information Collection; Preservation Certification Application published in the Federal Register on August 30, 2012. This notice invites public comments regarding Historic Preservation Certification Application, more commonly known as the Part 1, Part 2 and Part 3 applications.

Port City Preservation LLC is a consulting and development firm headquartered in Syracuse, New York that specializes in the rehabilitation and adaptive reuse of historic properties. Our work has embraced a wide range of historic property types including hotels, schools, mills, hospitals, homes, industrial facilities and downtown buildings. During the past twenty years, we have served in a wide range of capacities related to these historic properties including serving as an investor, lender, owner, developer, project manager, property manager and consultant. Our clients and partners have included municipalities, non profit groups and the private sector. We have participated in more than 107 successful projects that have utilized the federal rehabilitation tax credit program.

The authority for this application process is governed by 36 CFR Part 67. Upon receipt of the complete application describing the rehabilitation (Part 2), the Secretary of the Interior shall determine if the project is consistent with the Standards for Rehabilitation. Conformance with the Standards will be determined on the basis of the application documentation and other available information. 36 CFR 67.1 outlines in great detail the Standards for Rehabilitation. Subparagraph (b) provides that: *"(b) The followings Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility."* (emphasis provided).

Simply put, the regulation requires that the Secretary take into consideration economic and technical feasibility when making their determinations. However, the Application form, the related instructions and all other secondary information contains no reference to this requirement. In fact, we believe that most decisions made by the National Park Service do not consider economic and technical feasibility. The Application forms are not structured in a manner to collect any information related to economic and technical feasibility for a proposed project.

**Letter to Michael J. Auer**  
**September 25, 2012**

We recommend that the Application forms and related instructions should more appropriately indicate that economic and technical feasibility are required considerations in the decision making process. The Application form should be modified to include a mechanism for applicants to include relevant information on these important points. Further, the applicable instruction should clearly indicate that economic and technical feasibility are important and required considerations in the decision making process.

We appreciate the opportunity to submit comments.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'M. F. Gould', written in a cursive style.

Murray F. Gould