

Barry Sulam representing self shares in the objections by : "Preservation Action Expresses Objections to Proposed Rule Changes to the National Register of Historic Places

This week Preservation Action met with the Office of Information & Regulatory Affairs to express our concerns about the proposed rule changes to the National Register of Historic Places. The National Park Service is moving closer to finalizing rule changes to the National Register of Historic Places that will have a significant impact on how properties are nominated to the National Register and determined eligible, despite significant opposition. During the meeting Preservation Action objected to several rule changes including provisions that would essentially give federal agencies a veto power over National Register and historic district nominations, as well as changes that would allow large landowners to have an outweighed ability to block historic district nominations.

The National Park Service first proposed these rule changes to the National Register in early 2019 and the preservation community responded with an outpouring of comments expressing their concern. In total over 3,000 comments were submitted, the vast majority opposing the changes. Preservation Action submitted comments, specifically highlighting 7 ways the proposed revisions would impact local communities, and encouraged others to submit comments as well." By Preservation Action.

Barry Sulam former regional historical architect with the NPS offers a Montana based comment: By restrictive changes to the NR process the Secretary of Interior Standards for Rehab will not have to be followed. Eligible and contributing historic properties will receive none of the protections nor incentives like the grants and tax credits available if listed on the NR.

The following proactive Standards and the NR program have been the congressionally authorized executive powers for over half a century. For your information below are the SOI standards that property owners will **not** have to adhere to if the NR revisions are permitted to begin the dismantling of the federal protections that are in line with the USA's charter with international signatories of ICOMOS.

(b) Secretary of Interior's Rehabilitation Standards (to be followed if building is in an historic district or individually eligible and able to receive grants in aid)

(1) A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.

(2) The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.

- (3) Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
- (4) Changes to a property that have acquired historic significance in their own right will be retained and preserved.
- (5) Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
- (6) Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
- (7) Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
- (8) Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
- (9) New additions, exterior alterations or related new construction will not destroy historic materials, features and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
- (10) New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.