

December 6, 2006

Dear Ms. Nelson:

I have reviewed the draft White Paper “Pinpointing Strategies and Tactics for Integrating Green Building Technologies into Historic Structures.” I regret to say that the paper is deeply flawed. A basic misunderstanding of the “Secretary of the Interior’s Standards” runs throughout the document. It is also full of errors in terminology and matters of basic fact. As a result, in its present form, the draft White Paper does a grave disservice to the Standards, to the National Park Service, and to historic preservation in general. I must register a strong protest against the description of the Standards presented in the paper.

As Chief of Technical Preservation Services (TPS), I head the National Park Service office that created the Secretary of the Interior’s Standards for the Treatment of Historic Properties. TPS also administers the Federal Historic Preservation Tax Incentives program, which uses the “Secretary’s Standards” to determine whether rehabilitations of historic buildings qualify for Federal tax incentives. Over the years, the “Secretary’s Standards” have successfully guided over 33,000 rehabilitation projects, representing an investment of over \$39 billion in America’s historic buildings. While the LEED certification process and other “green” initiatives are fairly recent, environmental goals such as energy conservation are not new. For many years the Standards have guided rehabilitations that preserved historic buildings *and* met goals such as energy efficiency and other “green” issues. However readers of the draft White Paper would come away with a very different impression, namely, that the “Secretary’s Standards” as written and applied by the National Park Service to tax incentives projects are incompatible at present with these environmental goals. The misstatements about the “Secretary’s Standards” in the paper set up a false dichotomy between “preservation” and “green” concerns. This allows the draft White Paper to offer “solutions” to the conflicts thus identified, but the mischaracterizations are such that they call the validity of the entire White Paper into question. This is most unfortunate, but a thorough reading of the text leaves me no other option.

On the enclosed annotated copy of the paper, I have commented on passages reflecting misunderstandings and misstatements. One basic misunderstanding runs throughout the paper. It bears discussion here.

In describing “The Existing Situation,” the paper states: “As written, these standards focus tightly on the accurate restoration of historic buildings to their original as-built states.” (page 3). The statement is categorically incorrect. The Secretary of the Interior’s Standards for *Rehabilitation* govern projects reviewed by the National Park Service for the investment tax credit. The Standards for Rehabilitation do not call for the “restoration” of historic buildings—let alone “focus tightly” on it. In fact the Standards for Rehabilitation never require “restoration” in a “rehabilitation” project. And far from focusing “tightly on the accurate restoration of historic buildings to their *original* as-built states,” the Standards for Rehabilitation used in the tax incentives program actually *forbid* restoration to a building’s “original” state in some cases. Standard 4 states: “Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.” “Restoring” a building to its original state could easily bring a project into conflict with this Standard. The statement is a factual, explicit error that gravely misrepresents the Standards and their application to rehabilitation projects by the National Park Service.

Moreover, the statement that the Standards call for the “restoration” of historic buildings, like the White Paper as a whole, shows no awareness that there are *several* sets of “Secretary’s Standards.” The Secretary of the Interior has issued separate Standards for four approaches to treating of historic properties. The four treatments are: Preservation, Rehabilitation, Restoration, and Reconstruction. Together they comprise the “Secretary of the Interior’s Standards for the Treatment of Historic Properties.” Confusing the “Secretary of the Interior’s Standards for Rehabilitation” with the “Secretary of the Interior’s Standards for Restoration” is a radical flaw running all through the paper.

In addition, the paper makes incorrect statements regarding the application of the Standards to concrete situations encountered in rehabilitation projects. Two examples will suffice here. The paper states: “Unfortunately, nearly all of these new products—such as synthetic slate... are not viewed as compatible or acceptable for use in historic restoration projects” (page 10). Note first that the statement repeats the theoretical confusion of “restoration” with “rehabilitation” discussed above. In addition, it is also factually incorrect on the issue at hand: the substitution of new materials for historic ones in tax incentives projects generally, and the use of synthetic slate to replace historic slate roofs in particular. As a general matter, the Standards for Rehabilitation do not prohibit the use of synthetic substitute materials; they only require that new materials provide a suitable match for the historic ones. As for synthetic slate in particular, the National Park Service regularly accepts it in tax incentives projects.

Specific errors can be corrected, such as referring to the National Park Service by the wrong name; I have pointed these out on the annotated copy. However, the theoretical confusion and objective misstatements are such that nothing short of a thorough revision can remedy these defects. The goal of promoting green building technologies in rehabilitations of historic structures is a worthy one. But by misrepresenting the Secretary of the Interior’s Standards, the draft seriously impedes that goal.

Sincerely,

Sharon C. Park, FAIA
Chief, Technical Preservation Services

Enclosure

Comments on draft White Paper “Pinpointing Strategies and Tactics for Integrating Green Building Technologies into Historic Structures”

General Comment on Terminology involving the “Secretary of the Interior’s Standards”

The National Park Service, an agency within the Department of the Interior, has issued four sets of “Secretary of the Interior’s Standards”: Standards for Preservation, Rehabilitation, Restoration, and Reconstruction. Together they make up the “Secretary of the Interior’s Standards for the Treatment of Historic Properties.”

The draft White Paper appears to rely on the Secretary of the Interior’s Standards for Rehabilitation. The National Park Service (NPS) issued these Standards in 1977. NPS uses the Standards for Rehabilitation in the Historic Preservation Tax Incentives Program. Thus, the word “restoration” should not be used when referring to these standards.

NPS practice is to refer to the “Secretary of the Interior’s Standards for Rehabilitation” or the “Standards for Rehabilitation.” NPS also uses the term the “Secretary’s Standards,” but only when the text has already referenced the Standards for Rehabilitation explicitly.

The term “historic preservation” is a general one referring to the field or discipline of caring for historic resources. The word “preservation” can also be used in this sense, as long as the context is clear that it refers to the discipline in general, and not to the Standards for Preservation or the specific treatment of preserving a building rather than “restoring” it.

Specific Passages

See the attached annotated copy for comments on particular passages.