

Beyond Bricks and Mortar: The Changing Practices and Philosophies of Historic Preservation

Panel Participants:

- Casey Lee (Facilitator), Historic Preservation Specialist, Section 106; Tennessee State Historic Preservation Office
- Janie Campbell, Preservation Consultant; Rogers Lewis Jackson Mann & Quinn, LLC
- Stephanie Gray, Assistant Professor of Public History; Duquesne University
- Hallie Hearn, Architectural Historian; Tennessee Valley Authority
- Rebecca Schmitt, Historic Preservation Specialist, National Register; Tennessee State Historic Preservation Office & PhD Student, Middle Tennessee State University

Panel Description:

The field of historic preservation is always evolving due to the very nature of the field. You do not consider a building for preservation until it becomes “historic,” typically at fifty years of age. Therefore, preservationists are familiar with re-evaluating and adapting to change when it comes to the buildings, structures, objects, and landscapes they study and preserve. However change in the field is happening beyond the ever-increasing selection of buildings due to age requirements. Preservationists must also adapt to change resulting from social and political priorities, digitization, climate change, demographic shifts, economic development pressures, and the challenges of working with the general public. Using a Structured Conversation format, this session breaks down how these motivators of change have led to an evolving preservation field that prioritizes inclusivity, partnership, minority histories and sites, and access. For each topic, the participants will draw on their experiences to discuss the changing nature of the field. The discussion will touch on the ever growing push for streamlining different preservation processes, questions of integrity, decline in quality of some consultant work, and great political and social pressures. The participants will welcome audience participation throughout the session. Finally, this session will touch on how preservationists in the field do not fully know how these changes will impact the continued progression of the field.

To complete this in-depth look at changes in the field of historic preservation, the participants will break down and demonstrate examples from their own work and experience. The participants have been chosen because they represent a wide variety of historic preservation professionals and can demonstrate how these changes play out at the federal, state, and local levels of preservation. They have also been chosen for the different preservation program areas they have experience with from Section 106 of the National Historic Preservation Act, the National Register Program, the Federal Historic Preservation Investment Tax Credit, local preservation guidelines, and Federal Section 110 management. By including a wide range of professionals with varying experiences, we can demonstrate that this change is profession-wide. Our wide range of experiences demonstrate ways professionals have adapted to changes in the field but also how the field is ever evolving so preservationists should not assume the field is static.

VIRTUAL PANEL

Topics Where We See Changes in Preservation:

Minority Sites and Histories

Casey Lee, TN SHPO: This has become a National Park Service priority for National Register nominations. Sometimes these sites are hard to identify in Section 106 reports, as much of the history might not have been documented. In many cases, these sites can be in poor condition, and when we do not have a lot of history from whoever sent in the report, historic sites related to minorities can be overlooked. More and more, due to more research into these sites, minority sites come up in Section 106 projects. Then, we have to look at the integrity of these sites. In a few cases recently, the integrity for minority sites in 106 projects have been compromised in some way, leading federal agencies to disagree that these sites are eligible. We have had to send a few projects to the Keeper of the National Register to get a final eligibility determination so the 106 process could move forward. The issues with integrity also make it harder to distinguish between what could possibly be an adverse effect or no adverse effect because in many cases, the integrity is severely compromised, but the historical significance is so great as to override the lack of integrity. But if there is little integrity, does it matter if certain rehabilitation work is done? Or how will a certain project affect it? It has been interesting navigating this change and developing a consistent office wide approach when dealing with minority sites that are incredibly significant, but retain less integrity than we typically see.

Hallie Hearnes, TVA: Similar to the push within academia, federal agencies are also beginning to examine our own histories and the histories of the places that we manage and impact with a variety of lenses. TVA has a varied and complex history. We have the prehistory and history of the places that existed before the development and construction of TVA's dams and the history of the construction of the dams. Labor for dam construction was sourced locally: members of the Eastern Band of Cherokee Indians at Fontana Dam, African Americans and several other minority groups among the 4,700 workers at Wheeler Dam. In Section 106 reviews, we are continuing to explore resources associated with minorities. A few recent projects include sharecropper farms and camps for enslaved workers.

Stephanie Gray, Duquesne University: There is a big push in the academy to focus on sites of minorities and underprivileged populations in preservation endeavors. I'm at a Catholic university in Pittsburgh whose mission is (in part) to practice meaningful community engagement. As Public History faculty, I know that there are certain communities with which the administration would like me to engage (which I'm eager to do). In particular, the Hill District, a historically African American neighborhood (amongst other marginalized groups like Jewish- and Lebanese-Americans). Duquesne has had a fraught relationship with this neighborhood because the campus sits between the Hill and the bustling, commercial Downtown. Doing student-led, community-based projects centered on "minority" sites and in areas like the Hill can, however, be difficult on a practical level. The cultural landscapes are often vernacular and sometimes in areas that are not optimal to send students for safety reasons (I'm speaking generally, not necessarily about the Hill District). Moreover, these sites can be extremely difficult

to research. Government agencies - from the local to state to national - are wonderful repositories of gray literature for both faculty and students. Practitioners, like Hallie, Casey, and Rebecca at SHPO and TVA, create and house context info (National Register nominations, surveys, research for Section 106 projects) that can help students conduct place-based research that can aid in student projects. Moreover, the difficulties that preservationists face over integrity and lack of documentation exist are the same difficulties we face coming at these sites from the academic perspective. As first-year faculty, I'm wondering how we can help formalize relationships so that the work that folks like you all do (either at SHPO or the documentation that preservation consultants like Janie does that ends up at SHPO) are made accessible.

Rebecca Schmitt, TNSHPO & MTSU: There is still a ton of interest in encouraging the recognition of places associated with non-European histories, though there are challenges. As Stephanie noted, these sites are often difficult to research with little traditional records. We have found oral history to be the most useful source of information on the history of these sites, though that methodology has its own challenges, particularly with the reliability of memory. As referenced by Casey, we've had recent challenges with integrity for non-European sites, particularly one that was formally determined eligible despite having severely compromised integrity due to the destruction of most of its resources. That decision created a precedent that has made us examine other similar sites more broadly to consider whether the history of a site is enough to overcome significantly compromised integrity, particularly that of materials, design, and workmanship. While the TNSHPO has had a focus on listing African American sites in the National Register since the mid-1990s, we have not had as much focus on sites associated with other histories. There are a number of sites listed for association with Native American history, though mostly Trail of Tears sites. There are many archaeological sites throughout the state that could be listed for Native American history, but most are not listed due to the special skills required to complete archaeological nominations. I am looking forward to focusing more on LGBTQ+ histories. The problem we have run into thus far has been a lack of research and therefore a lack of an understanding of context, as well as the destruction of known sites. My hope is that as more people research the history of LGBTQ+ history, we will be better able to understand and identify the places that are still here. In instances where National Register listing is not possible, I hope to encourage other recognition programs, such as historical markers. The Metro Historical Commission in Nashville has already been at work recognizing the location of 1970s gay bars that played an important role in LGBTQ+ culture but are no longer extant.

Stephanie Gray, Duquesne: As Rebecca notes, some allowances have to be made for the preservation of sites associated with non-European histories that lack the architectural integrity that for so long has been a critical component of marking preservation "worthiness." Moreover, different groups of people value place and physical structures differently, especially Native Americans. And regarding the LGBTQ+ population, their history has literally been quieted or hidden historically, which absolutely translates to their presence in our built environment. Most certainly the LGBTQ+ public history landscape is ripe for further exploration, and I don't mean to underestimate the physical presence of associated sites, but as preservationists we have to take a broader view on how to assess sites for worth/potential.

Janie Campbell, RLJMQ: Coming from the private sector, I have experience with minority sites that both remained within their original community and those that have experienced gentrification through redevelopment. It poses, as Stephanie has mentioned, challenges to do research on a building that, during its period of significance, did not warrant recognition by the majority, and therefore can be lacking traditional sources. Additionally, addressing changing histories, such as sites originally associated with the African American community and later became known in the area's collective memory for its association with whiteness, or vice versa, can be difficult to tease out, particularly when the client is not interested in one version of that history.

Stephanie Gray, Duquesne: Rebecca and Janie both raised the issue of lack of traditional [written] historical sources sometimes available for documenting sites associated with minorities histories. As Rebecca also wrote, oral history is an incredibly useful skill/tool to fleshing out the history of a building, not just of movements, events, etc. So much of the preservation field is cornered on documented, irrefutable evidence, coming from architectural plans, maps, and historic photographs. How do we better incorporate oral history into our work as preservationists?

Changing Demographics in the Field

Casey Lee, TN SHPO: In recent years, it seems that the preservation professional field involves more and more younger women. The applications my office receives for open positions are mostly recent graduates in the field and consist of mostly younger women. It does not seem like this was always the case, as the majority of people in our office who have retired in the last five years after being in the field (and their position) for thirty plus years were men. We still do not see much diversity when it comes to race. Even though we see younger women, they are typically white women. Also, the vast majority of members of the public we interact with for projects who are interested and passionate about preservation still seem to be older white women and men (mostly women). This trend has continued from early preservation; Mount Vernon Ladies Association, etc. What does this trend mean, if anything? Do we know how this will affect the field moving forward? How do we make our field more diverse?

Hallie Hearn, TVA: It may depend on whether a program is based in a college of design or history or specifically historic preservation, but the majority of my classmates in undergrad and graduate school were women. Also as a contractor prior to TVA, women comprised the majority of our architectural history program. Wasn't the preservation movement started by women with Ann Pamela Cunningham and the Mount Vernon Ladies' Association?

Stephanie Gray, Duquesne: Like Casey and Hallie, I also notice a gendered trend in the academy. My sense, however, is that the larger professional field of preservation remains largely balanced (I'm thinking about developers, architects, restoration workers, etc.) I would like to address another demographic trend: **age**. Historic preservation - conceived of as community revitalization - seems to be quite trendy amongst millennials. So not only might there be a gender shift at play, but a generational one as well. Increasingly, rehabilitated buildings are

hallmarks of “livable cities.” I’m in Pittsburgh - which many describe as one of the most livable cities in the U.S. - and along with parks, museums, bike lanes, restaurants, etc., the city’s varied historic architectural fabric is a big contributor to what makes it “livable,” i.e. cool! How can we capitalize on this interest from millennials/young professionals/young families to advance a preservation-minded agenda? And minimize the negative effects of gentrification?

Casey Lee, TN SHPO: Stephanie raises an interesting point. We do see more younger, typically millennials, who appreciate preservation, but maybe do not realize that is what they are appreciating? Millennials typically value a sense of place and functionality in a neighborhood or city. We in preservation (at least those that deal with the National Register of Historic Places) would say those values translate into feeling and design. Historic neighborhoods and cities have a sense of place because of their design and collection of historic architecture, which makes the neighborhood feel and look different than other neighborhoods/cities. They are typically very walkable and ideal living environments for millennials because the design of historic neighborhoods developed for those purposes before the wide use of the automobiles and suburban sprawl. However, I am not sure (I could be wrong) that millennials are aware that this value they place on these neighborhoods/cities is preservation. They may not want to preserve the wholistically the way SHPO professionals would (to include in-kind replacement, etc.), but their emphasis on sense of place and functionality is still a value for preservation, just maybe not at the material level. I work at the SHPO level, and do not encounter many millennials around the tables I sit at for preservation projects (beyond the young women who make up the preservation profession at SHPOs, local government, federal agencies), but maybe they are more active on the local level and in grass roots movements? I would be interested to hear from anyone that works at those levels.

Rebecca Schmitt, TNSHPO & MTSU: As noted by the other panelists, I have also noticed the trend in preservation where most practitioners are women, though my understanding is that geography plays a role as Hallie noted. A few years ago, I was told anecdotally by a grad school mentor that while most preservation programs have predominantly women, there are a few programs still have a majority men, though they tended to be at institutions considered to be Ivy League or similar to it. While practitioners have definitely been mostly younger women, most of the grassroots organizers that I have encountered have been equally men and women though most are older and retired. My feeling is that this is simply due to availability of time as younger people are likely still in the workforce and therefore less likely to have the time to engage in grassroots organizing. In this respect, it does not seem that this aspect of preservation has changed too much.

Janie Campbell, RLJMQ: While most of the SHPO and city staff I interact with are women, my field, as a consultant, is largely dominated by older white men, whether they come in the form of developer, architect, or contractor. While not preservationists by title, the developers’ economic investment in historic buildings warrants some discussion of their motivations. Some are in the field solely for the financial incentives, but many developers are interested in the building because of its history and with a desire to rehabilitate it so that it becomes useful again. Do we then define them as practitioners to some extent if the intent is there?

Casey Lee, TN SHPO: This is interesting. We seem to have different demographics in different areas of preservation. In the more traditional “professional” roles (local, state, and federal government, consultants, academia, etc.) we see a trend of younger women. The developer, architect, and contractor side seems to be predominantly men, while grass roots and

non-profit membership seems to lean more towards older men and women (mainly white in my experience). Why is this? How do we go about making each area within preservation more diverse? I think the emphasis on trying to include underrepresented populations in historic preservation may help with this. In the past, minority populations may not have seen the benefit of preservation to preserve places that represented their culture or history. Hopefully that is changing as in the last 20-30 years there has been a focus on African American sites, Indian sites, and in the last 5-10 years, LGBTQ+ sites. Perhaps as more of these types of resources are preserved or their histories recognized, we will see a more diverse field.

Partnership

Casey Lee, TN SHPO: In 106 world, Partnership=Successful Project. It is federal law under the Section 106 regulations to include consulting parties and the public as you proceed with your undertakings. When federal agencies broaden their definition of consulting parties and reach out to include more consulting parties and members of the public, we have more successful consultations to resolve issues and adverse effects. Including Indian tribes is almost always required these days, and it is definitely strongly encouraged as they have information on their resources that other preservation and history organizations, SHPOs included, do not have. In fact, we have seen a few federal agencies create a tribal liaison position with their offices in order to better include tribes at the table. This is important because in order to fully understand the significance of many resources, it is best to have as many people at the table with knowledge of the resource as possible. Native plants are often important to Indian Tribes when it comes to their cultural and religious resources. If that site is eligible or considered a Traditional Cultural Property, then knowing that information could completely change how we evaluate the effects of that project and it may change the types of mitigation asked for in an agreement document to resolve any adverse effects. Section 106 consultation in recent years seems to be trying to reach as many consulting parties as possible and bringing in people that may have been excluded in previous years because it was thought they had no connection to the historic resource. We are changing the way we think about who gets to sit at the table.

I also have experience recently on sitting on a regional environmental planning group. Middle Tennessee has seen massive growth in the last 5 years. The unpreparedness for that growth has made that growth not ideal (urban sprawl, encroachment on agricultural land, loss of historic resources, threat to natural lands, endangered species, and water, etc.). Recently, the region brought together a group of people who had environmental concerns to hopefully better plan moving forward in order to decrease the threat to these environmental concerns and values. I am hopeful that with so many partners at the table, we can find solutions. I think it is important for everyone to see how many values these different environmental concerns have in common, and this is something our office should emphasize as I feel most people think of only natural concerns when thinking of the environment and not cultural and historic preservation. Preservation is environmentally sustainable, after all the greenest building is one that already exists! Preservation helps preserve agricultural land and rural communities, as a rural setting is important with historic resources in these areas. Preservation allows for ideal density in cities, cutting down urban sprawl. Archaeological sites are often along rivers and other bodies of water, giving us commonality with those concerns about water sources. I think having all of these people in the room will help middle Tennessee create a better environmental planning strategy for future growth.

Hallie Hearn, TVA: From a federal perspective, partnerships are key to successful preservation and management of historic resources and Section 106 compliance. TVA has a dedicated Tribal Liaison who works to build partnerships with the 20+ Tribes that we currently consult. Hosting archaeological field schools cooperatively with representatives of Tribes have further cultivated the partnerships we have with Tribes. We also often involve consulting parties regularly as a part of our 106 review and development of MOAs. Partnerships between universities and local and regional entities—like those I gained through the Center for Regional History and Center for Historic Preservation—provided invaluable opportunities to work with preservation professionals and local historians to do preservation prior in a real-world application prior to entering the field as young professionals.

Stephanie Gray, Duquesne: While I was a graduate student at the University of South Carolina, I worked at the SC-SHPO for two years as a graduate assistant. At the time I knew how formative it was to my understanding of what it is preservationists actually do. Now, however, as an educator myself in a Public History masters program, I appreciate the opportunity to gain this practical experience even more. I hope to become a facilitator of these partnerships that are critical to agencies like TVA and SHPO, but also to graduate education.

Stephanie Gray, Duquesne: Of course I'm thinking of partnership in terms of preservation practitioners (like you all) and academics (like me), who might utilize the documentation housed at government agencies. I know from talking to government historians that there is a sense of exasperation/annoyance at times when professors/students approach the real world work in which you all engage and do studies on, or about, the effectiveness of your work. And that frustration is understandable - we read and theorize and we imagine best practices for what public history/preservation work *could* look like - but you all are on the ground doing it (although public history faculty are practitioners as well). How might I, as a professor of public history/preservation, better articulate the challenges/issues/problems/situations that you face? How can I better prepare my students for partnerships that might be in their futures between them (as practitioners) and tribes, consultants, lawyers, city planners, laypeople, etc.?

Casey Lee, TN SHPO: I think one thing academics could do would be to make sure you share your research and class projects with your local government preservation professionals, your SHPOs, and any other organization that might benefit. As a SHPO staffer, it is a little surprising how little universities share their research/class projects with us. Our files are not completely exhaustive, and I feel like some do not share their research with us because they think we already have files on these buildings/sites/etc. That is not always the case! We are always looking to expand our files. I also think the best thing you can do for your students to prepare them for a preservation practitioners world is to create projects that make them interact with different groups. It sounds like you are doing this, as you mentioned doing projects in different neighborhoods earlier, but contact your SHPO and see if they need any survey or nominations done. Create partnerships with different preservation organizations and encourage internships or assistantships with those organizations. Invite guest speakers from different types of preservation organizations. These may be things you are already doing, as my university encouraged these things, but they are extremely helpful. The best way to learn is to do it! I think a lot of students come out of the classroom and do not realize how much compromise comes with being a preservation professional. Successful outcomes look different for every preservation project, and it may not always be the preservation ideal. I think trying to have your students think about what values/outcomes in preservation mean the most to them will help them later. Is the physical preservation of every detail most important to them? Or is it the sense of place, documenting the history, having community spaces, etc. Some jobs will give you your mission and make you think of preservation in a specific way, but even in those jobs, there will have to be compromise, so you can try to get the pieces you think are most important for

preservation. For instance, we just found out there will most likely be massive amounts of demolitions at a historic site my office works with. Since it has to go through the 106 process, this is an adverse effect and if they continue with the project, they will have to do mitigation. We will want the mitigation to focus on preserving any nationally significant properties at the site, doing oral histories (especially to capture underrepresented communities) and display that information publicly, document everything before it is demolished, and create and make available programming for all types and ages of people. Other options are to give money to a related site so it can be preserved. There may be more as well, but it is early days. You have to realize in preservation that you will lose buildings, but maybe you can compromise to get something else that still preserves the history.

Rebecca Schmitt, TN SHPO & MTSU: I second Casey's note on sharing research! Any research, whether done by professors or students can provide vital information and make SHPO's jobs much easier!

Stephanie Gray, Duquesne: Thanks for the advice and encouragement, Casey and Rebecca. I'm definitely of the mindset that the work students do should be useful; I want them to feel like they're producing "gray literature" (in addition to more traditional forms of history scholarship, too), and I will continue to try building relationships with important preservation partners at various levels - local and state, especially - where student research and projects can find homes and actually help facilitate the work of preservation practitioners.

Rebecca Schmitt, TNSHPO & MTSU: The National Register of Historic Places would not be possible without partnerships. The history of TN's National Register program illustrates this. Originally, the TN Historic Sites Advisory Board (now the State Review Board) recommended properties as eligible for listing and TNSHPO National Register staff typically then had to write all the nominations. Even considering that NR nomination requirements used to be very brief with minimal research and documentation, this process still resulted in a lot of nominations never being completed because it is literally impossible for staff to do it all. Today, the majority of nominations are not completed by NR Staff, though we typically write 2-3 a year from scratch. The TNSHPO has partnered with many institutions to facilitate the creation of nominations and other preservation processes. For example, the TNSHPO utilizes a large portion of its Federal Historic Preservation fund grant to fund Preservation Planner positions throughout the state. Most National Register nominations are completed by these planners. This has created an efficient process where a planner is responsible for 4-12 counties (not the entire state like the NR coordinators are) and therefore is more quickly able to help people. As the planners draft more nominations, they also become more knowledgeable in the process, which cuts down on rounds of editing. Beyond NR, the planners also aid in Survey, Section 106 reviews, tax credit projects, local planning, and grant management. Other partner institutions, such as MTSU Center for Historic Preservation and local heritage groups have also proved vital in the National Register process, sometimes with challenges as people are often unfamiliar with the requirements but their work on the ground at least facilitates my increased ability to help them refine their work to meet NR requirements. To sum up, the creation of partnerships over the years has facilitated the listing of hundreds of National Register nominations and has given local people a stake in the federal designation process. Today, I don't think preservation would be possible without partnerships.

Janie Campbell, RLJMQ: The world of the consultant is filled with partnerships. My position specifically is responsible for working closely with local, state, and federal agencies as well as the developer, architect, and contractor to ensure the rehabilitation

adheres to the Standards. Trying to educate the latter entities on why certain elements of a building are character defining, and therefore necessary to retain and reincorporate into the new plans, can be challenging. Facilitating discussion between myself, SHPO, and the development team generally leads to a more successful and streamlined project.

Access

-ADA Accessibility

Casey Lee, TN SHPO: There seems to be an uptick in Section 106 reports that involve projects for ADA accessibility. Many of these are for private residences, but we have also noticed a trend from the National Park Service and other land holding agencies who are inviting the public to and into their historic resources. We also see this trend for many colleges and universities (on our state review side of review and compliance) who need their students, faculty, and staff to be able to access their campus buildings. I feel like access has become really important in recent years for everyone, as museums introduce different mediums for exhibits so the hearing and visual impaired can still experience the exhibit. Access also refers to making your information accessible, as discussed below with digitization.

Hallie Hearnes, TVA: The majority of TVA's hydroelectric facilities were originally designed to be accessible and visited by the public—the visitor's lobby of all of our dams (and many other facilities as well) feature the phrase "Built for the People of the Valley" flanked by the start and end dates of construction. While 9/11 and the security measures implemented as a result have restricted public access, many of the public spaces either meet ADA requirements or have required minimal alterations or additions of minor ramps in order to clear single steps. Restrooms that have required renovations have often retained as much of the original marble, granite, and terrazzo features, while being adapted to accommodate larger stalls and handrails for ADA compliance. One restroom project we recently completed, at the CCC Pavilion at TVA's Muscle Shoals Reservation was not able to be fully ADA-compliant due to its location within a significant landscape, but the final renovations allow for more visitors to be able to access and utilize the restrooms on either end of the picnic shelter.

Rebecca Schmitt, TNSHPO & MTSU: From the perspective of National Register program rules, ADA accessibility is sometimes a challenge. We sometimes encounter instances where changes made to increase access does not follow the Secretary of Interior's standards and therefore have compromised integrity. For instance, a Depression-era Post Office in southern Middle Tennessee had had a ramp and ADA-compliance entrance added to the facade, which replaced a window and significantly changed the facade. In past decades, this would automatically have made this property not eligible for the National Register and therefore potentially compromising its likelihood of being preserved. However, when we evaluated this property at the request of local townspeople, we noticed how many features were intact that showcased its importance as a post office, including original post boxes, interior doors, other

windows, and spatial layout. We ultimately concluded that the Post Office could still be eligible for its history, though maybe not its Architecture. While some might say this reflects a diminishment of the importance of integrity, I would argue that this reflects a major change in the field to better account for significant historical stories with less privileging of the architectural significance, which historically was usually the reason most properties were considered historic. It also recognizes that original physical design and material is not privileged over accessibility and usability by modern people. If people cannot use a building, why should it be preserved?

Janie Campbell, RLJMQ: The rehabilitation of buildings from one use to another certainly provides the need for accessibility where previously absent. However, I think many of our projects lead to the question of accessibility from a socio-economic standpoint. When a building is redeveloped, particularly in a gentrified area, who now has access to this building? Is a building initially constructed as an equalization school or a factory still catering to this demographic? Or are the high priced apartments, boutique hotels, or craft beer breweries geared toward someone else? How do we retain accessibility for all? Can we, or do rehabilitations change that access?

Casey Lee, TN SHPO: Janie raises a very good question. Preservation can often go hand in hand with gentrification. One way I have seen this problem skirted is through partnerships. Many larger tax credit projects also receive low income housing tax credits (if providing residences) from HUD in order to make the project more financially feasible. Therefore, they have to provide a certain percentage of affordable housing within their project. I'm not sure how else we work to avoid excluded people besides partnerships. I think if you bring everyone to the table before a project begins to listen to the values and desires of the surrounding neighborhood, the public, etc. then perhaps we could better work to prevent this problem?

-Digitization

Casey Lee, TN SHPO: Digitization is an office wide priority for the TN SHPO, as it is for most other SHPO offices. Digitization of our files makes it easier for consultants to do research, but it also makes it so anyone can research Tennessee's historic resources (with a few exceptions, most notable sensitive archaeology sites). It also makes it easier for staff to do their jobs, as everything is catalogued and accessible in one place instead of having to search five different types of files. This push towards digitization has made us data managers. We are also developing online portals that act as the interfaces for the public to access our information. This is not what I went to school for, and it has been challenging in some respects to adapt to these roles. Should this be a larger emphasis in programs that teach preservation? Is it already? Do we need more preservation programs and library science programs to partner so preservation students can be more equipped to handle these new roles?

Stephanie Gray, Duquesne: Like Casey brings up, most public history/preservation programs don't prepare graduates to be data managers, although depending on the type of position you land in after graduation, that could very much be a part of your job description. The good news is that many programs, mine included, are increasing efforts to boost digital history and engage in digitization projects. We always want our students to be working on useful projects and it sounds like there's a great opportunity here for students to help agencies overburdened with

digitizing material, as well as gain practical experience that might help them on the job market. As faculty, I of course want our graduate students to feel prepared when they leave the program, so I'll think more about this data manager/learn-on-the-job issue.

Casey Lee, TN SHPO: If you want to provide students with experience on what the data management side of preservation/public history could look like, I recommend having them get course credit (either internship or part of their grade for a class) to head out to some preservation organization and help them scan, create indexes, organize, etc. It seems easy at first...just scan and name this and save it. But we are creating brand new systems of organization and having to figure out, like Rebecca mentioned, how to fit every "department's" files together so they are easily accessible and easy to find (for both staff and the public). Even figuring out how to name files is more complicated than you can imagine, especially when the system you are using has limited characters, and everything in the name of your file is your searchable metadata. Digitization is especially difficult when your office has limited resources (money, time, or databases).

Hallie Hearnese, TVA: This is a huge push for federal agencies, including TVA. Many of our past reports and project records have been digitized but are stored in a variety of locations, including an Integrated Cultural Database for project review records. We are currently working on the development of an update to this that will allow us to gather information on both archaeology and architectural history. We have partnered with many of the SHPOs that we work with in order to fund digitization—including the TN SHPO where we partnered to scan survey photos and information files.

Rebecca Schmitt, TNSHPO & MTSU: As Casey noted, digitization has become a major priority of many government agencies, including the TNSHPO. Access to digital materials has definitely transformed the field as it has allowed increased access to resources, sources, and research. Despite its advantages, digitization also comes with a series of challenges, particularly access to appropriate equipment. For instance, TNSHPO has a standard copier/scanner that is suitable for most items, but not oversized items or slides or negatives, all of which are found in abundance in certain files, primarily those under my care as National Register coordinator. Some universities and archives have been successful at acquiring this equipment, but that requires quite a bit of money and justification, which makes it difficult for government agencies, smaller institutions, and nonprofits. The actual act of digitization also requires preservationists to add duties to their normal workload, which is not always possible. At the TNSHPO we have been able to deal with these challenges through partnerships. For example, as Hallie noted, TVA provided funding that allowed for the digitization of many files. We have also used equipment owned by MTSU to digitize large format materials. These partnerships do not eliminate every challenge, but they have allowed for progress.

Stephanie Gray, Duquesne: This kind of collaboration between TNSHPO and MTSU is great. Sharing equipment and, when possible, distributing the labor of scanning and digitizing can benefit both agency and university, when the relationship is properly nurtured (as seems to be the case here).

Janie Campbell, RLJMQ: The availability of digitized resources is largely how I research projects, particularly with out of town projects. As a private law firm, my research is not digitized and shared per se, unless the client wants to share historic images or findings on social media or their business website. However, I am able to share information with

local non-profits or neighborhood groups who are interested in further examining a building or the larger neighborhood.

The Evolution of What is Considered Historic, What is Worthy of Preservation, and What Can Actually Be Preserved?

Casey Lee, TN SHPO: Obviously, resources that are considered historic are constantly changing as resources get older or more information is discovered about them. However, in recent years, our office has seen a shift in the thinking of What Can Actually Be Preserved? This has to do largely with the Federal Investment Tax Credit Program. In Memphis, the Sears Crosstown Concourse Building was opened a few years ago. It was a distribution center and warehouse for the Sears Company, and it is massive! It sits on 12 acres of land and has approximately 1,500,000 square feet of floor area. This massive scale of this building presented a real preservation dilemma. Was it just too big to be functional? Luckily, a group of developers and an art history professor got really creative. They were interested in the urban planning concept for the vertical urban village, and that is what they created here at Concourse! There are apartments, a grocery store, a gym, restaurants, offices, schools, a movie theater, and more in this one building. People are starting to realize that for ideal urban density and green buildings, preservation is the way to go! It allowed this massive building to be saved and with the federal investment tax credit for historic preservation, and other tax credits (affordable housing), this project became a preservation reality. Perhaps similar ideas could be used when we get ready to talk about the preservation of malls? This is another example of how partnerships between different people and different fields can result in great ideas that make preservation a feasible and even optimal option.

Hallie Hearn, TVA: The application of eligibility under Criteria Consideration G seems to be more widely applied than it was in the past. This seems to be something that is harder to be written into processes and procedures where the 50 year rule was previously used as guidance to determine when projects are reviewed under Section 106.

Stephanie Gray, Duquesne: On one hand, having the 50-year benchmark is nice and easy! But as we continue to build on the work of preservationists over the past few decades in expanding our view of what makes a building or site worthy of preservation, that 50-year rule becomes less and less firm, as Casey and Hallie have already noted. Exploring the important historic environments of marginalized peoples, thinking broadly about what physical components contribute to a cultural landscape, and creating more and more historic districts at the local level, especially, have made us more flexible when considering the “worthiness” of historic built environments.

At the same time, now we’ve entered a period where we have to assess mid-century homes and ubiquitous commercial spaces, places that weren’t exactly “built for the ages.” The 1960 suburban home and the 1975 mall are both incredibly significant markers of political and cultural change in America. But on a practical level, how do we decide what are the exceptional buildings of unexceptional architecture? Of course I’m simplifying here and this conversation has long been going on, but are there guidelines in place for how to make arguments for *not*

preserving (for both practitioners and theorists)? For, perhaps the inevitable farewell to many structures that are, according to the 50-year rule of thumb, now “historic” architecture?

Janie Campbell, RLJMQ: I would say a quickly growing number of the projects we work on are examples of recent past architecture or represent histories that most would not credit with the designation “historic.” For example, a number of mid-century modern motels as well as a 1974 Brutalist government building (in Charleston, no less!) and an early 1940s housing project. Many object to these examples because they either think they are too young or are not worthy of merit because they represent a problematic past or seem unimportant for being an example of the larger context of that area of history. How do we change people’s perception of “historic?” As Rebecca stated above, do we reassess the guideline of 50 years to provide more buildings the chance to make it to eligibility for the National Register? Or is continuing to preserve examples of non-traditional preservation projects enough to sway people’s minds?

Casey Lee, TN SHPO: One project I know Janie worked on that I think shows the different ways people are thinking about what can be preserved is the Curtis-Wright Hangar. In recent years, rehabilitating mills into apartments has become very common, but we are seeing more and more unique rehabilitation projects as people get more creative about what sites/buildings can become. This project was a different one for me! Care to elaborate on how this project came about and how you had to think creatively to make the space work?

Janie Campbell, RLJMQ: This was certainly a unique project. One of the character defining elements of this building is its open space as a hangar. Finding a tenant that could utilize the open space was key, but also quite difficult (a number of people attempted to redevelop this property unsuccessfully). A brewery that didn’t “chop up” the interior worked perfectly to preserve the open space.

Rebecca Schmitt, TNSHPO & MTSU: While challenging, I think this is the fun part of preservation. For a long time, only the architecturally significant, grand homes were considered historic and worthy of saving. Now, we consider so many things worthy of preservation from all walks of life and histories. But there are still challenges. For instance, there are still issues with how much deterioration is too much. As an example, our office recently became aware of a historically significant property that had a partial roof collapse. Because of the history, I was all for still trying to pursue a NR designation, but senior staff members in the office overrule me with the viewpoint that the severe deterioration presented a major integrity problem and that they had dealt with similar situations in the past that didn’t end well. Where do we draw the line with integrity? Do we focus on the possibilities and try our best even knowing that the property may not be able to be saved? Or do we hold the line and focus our efforts on the properties that have the most potential to be saved and reused?

Stephanie Gray, Duquesne: As you say, it’s also a question of how much time and resources can/should be expended on projects that are threatened or more challenging because of their current condition. It may be one of those case-by-case situations, where you have to weigh a site’s historical significance against the quality (or lack therefore) of architecture. Obviously, preservation is tied to the physical landscape, but allowances have to be made, regarding both age and integrity.

Casey Lee, TN SHPO: While the broadening of our view of what is worthy of preservation has opened the doors to the preservation of underrepresented sites and histories, it is sometimes challenging because personally, we may not feel that something should be preserved even as we recognize its historical significance. While we may recognize that the history needs to be preserved, sometimes it is hard to argue for the preservation of the actual buildings. For instance, in the last few years we had a proposed project to demolish some public housing units and build new ones. We said the public housing was eligible and definitely

extremely historically significant, but I personally understood the need for new housing. Even a rehabilitation project may not have made these units more livable for people, and the new construction option was safer and provided residents more room and better conditions. However, we have other public housing projects that have been rehabilitated and preserved and work extremely well for their residents. I think sometimes it is a struggle recognizing that something is worthy of being preserved because of its historical significance but that it may not be financially feasible or the best option to physically preserve it for the people who have to live/work/etc. in these spaces.

Rebecca Shmitt, TH SHPO & MTSU: I also think the 50 year benchmark is ripe for reassessment. While many insist that 50 is a guideline, not a rule, it is often treated as such. We recently had a property up for nomination that was 49 years and 10 months old. It was sent back from NPS because it was not 50 years old, even though it had an established context and significance, because it did not quite meet the Criterion G requirements. The spirit of the 50 year rule is to allow for an understanding of the context and significance of a property. If those factors are understood, why must we wait until an arbitrary deadline of 50 to consider it historic? Why must we insist that properties less than 50 years old have to be exceptionally significant even when we understand its significance and the context of its significance? Having a 50 year rule is a useful cutoff in many instances, particularly for Section 106, but I worry that it may prevent preservation of significant places that may not be exceptional but are still worthy of preservation, even if they are less than 50 years old.

Climate Change

Casey Lee, TN SHPO: Since I review Section 106 undertakings, I see this a lot. I get FEMA projects for demolitions of houses on or near rivers and for buildings that have been flooded before. They are expanding where they demo as flood zones change and what used to be a 500 year flood zone, may now be a 100 year flood zone. I have also seen projects for raising buildings. This issue is not as clear cut as demolition. If you are demolishing a historic resource, then we have an obvious adverse effect. But what if you are raising a building? If we have data that shows that without raising the building it will most likely be flooded, do we consider raising the building a no adverse effect even though it changes the original design and compromises integrity? This is something local governments are going to have to grapple with as well when it comes to their local preservation ordinances and design guidelines. We have also experienced the shift in tornado alley, which has moved south and east. Tennessee is now in the new tornado alley, and recently felt the effects of a major tornado that touched multiple counties in the state and damaged historic resources. Do we take preventative measures for these changes climate change is wreaking? How? Is it okay to compromise the integrity if it means the building has a better chance of surviving the effects of climate change? In some cases, is documentation of the resource the best we can do?

Hallie Hearnes, TVA: As managers of resources along a major river and its tributaries, as annual rainfall or flooding events become more commonplace, we have to continue to monitor archaeological resources. We also have to review projects of restrooms, bathhouses, and other recreational facilities associated with campgrounds—like those at Pickwick—which suffered damage from flooding in early 2019. The replacement restrooms feature more rugged cast

concrete design and are designed to withstand being underwater due to flooding. Rather than selecting the standard designs utilized by western NPS units that are most popular, we in Cultural Compliance worked with our Recreation staff to select textures, features, and finishes that were compatible with the historic dams and facilities within the viewshed.

Stephanie Gray, Duquesne: I think this issue reflects the desire for many preservationists to become more proactive. Historically, preservation has been a reactive measure; we've moved far beyond that in the past few decades by creating local preservation laws/codes, establishing tax incentives, and, in the classroom, emphasizing the importance of place in identity creation/historical memory. The issue of climate change challenges preservationists to really adopt a forward-thinking mentality. Yes, the work we all do is protecting the built environment in the present so that future generations can benefit, but climate change presents a unique obstacle. What are practical measures you are taking (like what Casey raises), and what types of projects can scholars - who have the labor force (students!!) - develop that can prepare the built environment for the uncertain, but coming, effects of climate change?

Rebecca Schmitt, TNSHPO & MTSU: Climate Change is a very difficult force to deal with when it comes to the National Register, particularly since all NR staff do not agree on how much change to deal with climate change is allowable and still be NR-eligible.

Political Priorities

Casey Lee, TN SHPO: There has been a big push recently to streamline the Section 106 process through Programmatic Agreements (we worked on at least 6 in 2019 alone), which those in our office for twenty plus years say is an unprecedented number. The current administration even wants to eliminate certain regulations or eliminate review processes for certain types of projects. This could greatly affect historic preservation as federal agencies would have the ability to make determinations without concurrence from the SHPO, meaning many historic resources could be missed. Programmatic Agreements (PAs) can be really beneficial when they actually streamline the process for everyone by excluding the review of projects that have little or no chance of affecting or adversely affecting a historic resource. However, we have also found that many agencies are pushing for PAs just to have one as they think it will streamline the process. These are essentially unhelpful documents that take up a lot of staff time to edit and comment on. Our office has been trying to streamline the Section 106 process in a more logical way; moving our process to a digital, online system to cut down on mail time and to make our workflow more efficient.

Hallie Hearn, TVA: In the case of TVA's Section 106 PA, Casey mentioned, this process allowed both TVA and the SHPOs (AL, GA, KY, MS, NC, TN, and VA), ACHP, and 20+ Tribes we coordinate with to reach a consensus on which repetitive and small-scale activities we review are likely not to have an effect, and therefore no longer require consultation via the standard Section 106 process. This was a huge endeavor that required all of us to reach agreement—and a great example of a partnership. As a federal corporation who continuously works with state and local governments and local power companies, we increasingly find ourselves facing political pressure to do all that we can to speed up the Section 106 process.

And it's not always well received when we have to remind them of the standard review time outlined in the regulations. Do others feel similar pressure to do things as quickly and efficiently as possible?

Janie Campbell, RLJMQ: The change in the federal tax law affected business briefly, but we more typically deal with political pressures from local governments. This can be from either side, pushing our projects to be the example of the financial benefits that come with historic rehabilitations or attempting to hinder our efforts to prevent further examples (typically tax abatements at the local level). Some municipalities see these rehabilitation projects as a hindrance to due the loss of taxes from these new projects, but fail to see the long term benefits of the redevelopment it brings to the larger area and often the tourists attracted by a new project.

Rebecca Schmitt, TNSHPO & MTSU: The main political pressure right now as far as the National Register is a push to revise the rules in CFR60, which governs the National Register process. The Department of the Interior had a comment period last year at this time. Almost unanimously, the comments opposed the proposed rules. A big concern was the rules that would give more power to large property owners to object to listings, which could create major concerns for historic districts where one or two owners could wield more power than dozens. As a result of the action of a few, the majority could lose advantages such as access to historic tax credits. Another concern was a change that many fear would allow federal agencies to stop nominations that include federal properties. For example, if a district included a federal courthouse, the concern is that the federal agency could prevent the entire district from being listed. A third concern was changes to the Determination of Eligibility process, which was feared to possibly prevent consensus DOEs made during the Section 106 process. Right now, SHPOs and agencies can come to an agreement on the eligibility of a property and move through the Section 106 process accordingly. The concern is that the proposed rule change would require every DOE to go through the formal process with a full, technically correct form. If interpreted this way, it would stop and delay federal projects. I attended a NCSHPO meeting last year when these concerns were brought to the attention of the political appointee that was involved in the proposed rule. It seems that those who made these rules (who do not administer the NR program day to day), did not realize these potential consequences. Many people asked what problem these changes were meant to fix, and they seemed to emanate from 1-3 specific controversial federal projects. But they didn't seem to realize their proposed 'fixes' would actually create a bunch of new problems. In this specific instance, I think the failure is a lack of partnership. People who actually administer the National Register process were not included in the process until it came to the formal comment period. As a result, the intricacies of the system were not well understood and possible consequences overlooked. At this point, we'll have to wait and see what the new rules actually look like, but I'm hopeful that preservation advocates were successful in at least bringing some of these issues to light.

Technology

-Digitization

Casey Lee, TN SHPO: I have touched on this in a previous section regarding access. The push for digitization is also a State priority in TN, so it is a political priority as well. We also have

limited physical file space, so digitizing allows us more space. It has its challenges, especially when working for a state government which has limited funds for creating databases and has systems we must use to store our materials, which do not always work best for the types of data and materials we have.

Hallie Hearn, TVA: TVA has partnered with several other agencies and SHPOs to share digitized records. As more records are digitized, new sources of information are always emerging. Federal agencies continue to struggle with storage and management of all of these types of information.

Rebecca Schmitt, TNSHPO & MTSU: As noted elsewhere, TNSHPO has a priority for digitization which creates its own opportunities and challenges. I think the push for digitization has also highlighted inefficiencies in our work and has challenged us to come up with solutions. For example, at TNSHPO we recently have been working to put digitized materials into an online storage system. However, the online storage system doesn't quite work like we want it to in that it's difficult to link files together. Therefore, Casey and I worked together across program areas to create a document that would list all our files and cross reference them to at least attempt to make some of those linkages.

-GIS

Casey Lee, TN SHPO: We are trying so hard to get our information regarding historic resources into GIS. This allows for easier access, is the most helpful medium for retrieving data for 106 projects, as these are location based. It would also be really helpful as a planning tool, either for federal agencies planning their projects or even for local governments to use if they so choose. But how do we get there? This requires lots of funding and time. Ideally, we would have a dedicated GIS person in our office, but getting new positions is not always realistic. Currently, we partner with a university and other departments within the State for our GIS needs, but this probably is not the most practical way forward.

Hallie Hearn, TVA: Federal agencies, like TVA who are land and real estate managers continue to seek platforms and resources for the development and maintenance of data—particularly GIS data. TVA is working to develop a central project management system that includes an integrated GIS platform for review of projects. This would allow past project reviews, historic architectural and archaeological resources, known survey data from SHPOs, and many new sources of data to be viewed in a single location. IT development and support continues to be a struggle for federal entities.

Rebecca Schmitt, TNSHPO & MTSU: GIS is a significant technology that I think we all recognize has become vital to current preservation practices. Preservation practices of considering regional contexts and Area of Potential effects rely on geographical locales and their surroundings. GIS makes it easier to understand what historic resources are located in the same area. But like any other technology, GIS brings its own set of challenges. It requires education to understand how the system works, which has required our office to partner with a

nearby university to help us input data. However, even then, the data requires quality control. For example, the university we partner with input the National Register listed properties into a GIS database, but almost all of the points were incorrect, due to changes in mapping over the years. It has taken them years to find most of the properties and provide correct points. Currently, NR staff including myself are checking the points for accuracy before we allow them to be publicly accessible, but we are quickly finding that this is very time-consuming. We feel immense pressure to get through this quickly because we hear from colleagues and consultants about how helpful the GIS will be to their work, but we also want to make sure we get it right. The realities on the ground is that this is stressful, time-consuming work that when completed will be great, but nevertheless presents a number of challenges. As Casey noted, in a perfect world, we would have a dedicated GIS staff person, but the world we live in is far from perfect and obtaining new positions is extremely hard to come by.

-New Preservation Technologies

Casey Lee, TN SHPO: This is not something I am very familiar with, as I am not on the ground doing technical preservation. However, our office recently became aware of a new laser technology for paint removal because of the removal of graffiti on Andrew Jackson's tomb. This technology uses a laser to remove paint, dirt, etc. without damaging the historic materials. As new technology continues to be developed, it could make preservation easier and more feasible...that is if it comes with a reasonable price tag. Currently, this technology is too expensive for many preservation projects. We also see consultants using drones in order to assess visual effects of taller structures (cell towers mainly). The idea being that if the drone, at the location and height of the structure, can see the historic resources, then the historic resource could see the proposed structure. Drones have helped document historic resources. What new technologies have made preservation easier or have completely changed the way you approach certain preservation projects?

Hallie Hearn, TVA: Technology associated with 3D scanning and modeling of historic properties—like the scanning that had been done on Notre Dame prior to the fire—has greatly advanced. At TVA we are continuing to develop ways to utilize technology used elsewhere in our federal corporation including the use of drones for inspections and condition assessments (very helpful when the location you need to assess is not visible or accessible easily or safely) and the collection of LiDAR data. We are currently looking at how viewshed analysis—used by both us and contractors that we utilize—can be best utilized to be consistent and appropriately used.

Stephanie Gray, Duquesne: Our program recently acquired a 3D printer and scanner, and while they're small, we're excited about the ways we can use them to advance preservation efforts. Any suggestions would be welcome!