

11593

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PALEONTOLOGY AND THE LAW

by Charles M. McKinney, Archeologist
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For over 70 years vertebrate paleontological fossil specimens located on federally-owned or controlled lands have received protection under the provisions of the American Antiquities Act of 1906 (34 Stat. 225). This provision of the act appears in section 2 authorizing the President to create national monuments to preserve "historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest." The permitting authority of the act in sections 1 and 3, however, was intended by Congress, as evidenced by the act's legislative history, to apply only to archeological resources or paleontological specimens located within a cultural context.

Beginning in 1956 the paleontological scientific community began a series of discussions with federal officials in an attempt to have paleontological field investigations removed from the purview of the act. Although congressional intent was clear in 1904 and 1905 regarding the permit program, in 1908 paleontological field investigations were subjected to authorization by permit in the same

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OPERATION TOWNLIFT

by Sarah Glennan Oldham
Architectural Historian,
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The Tennessee Valley Authority (TVA) was established in 1933 as a regional agency of the U.S. Government for the purpose of undertaking unified resource development along the Tennessee River and its tributaries. The agency operates in parts of seven states: Alabama, Georgia, Kentucky, Mississippi, North Carolina, Tennessee, and Virginia. TVA was assigned a broad mandate by Congress to develop the Tennessee River for flood control, navigation, and electric power generation, to research and demonstrate improved fertilizers and agricultural practices, to promote reforestation and better land use, and to plan and demonstrate ways that the region could use its vast natural resources to improve the lives of the people.

One of TVA's programs is "Operation Townlift," a community planning service inaugurated in 1963. In that year a Tennessee county judge requested that TVA provide him with conceptual drawings for refurbishing a courthouse. TVA's staff provided this service and, over a period of several years, developed an expanded program to provide technical

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assistance to communities within TVA's
201-county power service area.

Operation Townlift, with a staff of seven professional planners augmented by architects, economists, and engineers from other TVA programs, has served over 100 communities since its inception.
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Photo: Jack E. Boucher, HABS

FHWA PRESERVATION COURSE

The Federal Highway Administration (FHWA) has organized a training course on Historic and Archeological Preservation for staff members from its field offices and from state highway agencies. Although final schedules have not been completed, the course is to be presented in Washington, D.C., and in each of eight FHWA regions at least once during 1977.

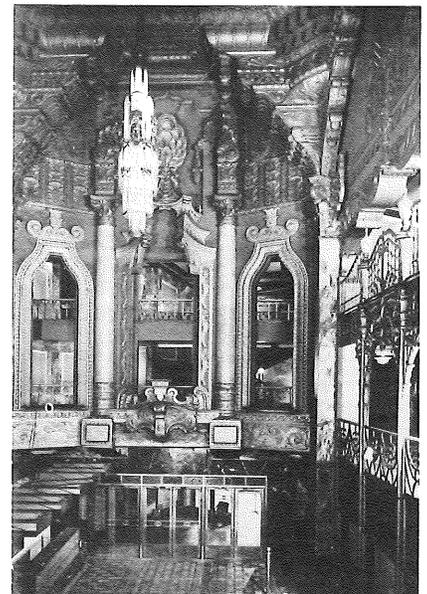
The purpose of the course is to stress the importance of historic preservation, to explain its relationship to the highway program, and to discuss the implementation of laws, regulations, policies, and procedures that are applicable to highway projects affecting historic or archeological sites. Topics that will be covered include the identification of historic and archeological resources, the determination of effects on such resources, and the resolution of adverse effects. Emphasis will be placed on discussion and analysis of case studies based upon actual examples. Each presenta-

tion of the course will last one week.

The Advisory Council on Historic Preservation and the Office of Archeology and Historic Preservation assisted in the preparation of the course and participated in pilot sessions. Both agencies also plan to take part in future sessions of the course.

FHWA field offices or state highway agencies will contact the State Historic Preservation Officers (SHPOs) to discuss their possible attendance. Experience with the two pilot sessions demonstrated that the presence of the SHPOs added greatly to the value and interest of the course.

The firm of Harbridge House is serving as a consultant to the FHWA in the preparation and presentation of the course. Additional information can be obtained from Kenneth C. Anderson, Office of Environmental Policy (HEV-22), Federal Highway Administration, Washington, DC 20590 (202/426-9173).



The Fox Theatre

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manner as archeological investigations. This administrative practice was continued over the years despite constant public challenge and was further supported by the Department of the Interior.

Surge of Interest

In November 1975, serious discussion began between the Department of the Interior and the Society of Vertebrate Paleontology's (SVP) Federal Liaison Committee composed of Dr. Craig C. Black, (Director, Carnegie Museum of Natural History); Mr. Hugh Rose (Amateur Delegate, Duxbury, Massachusetts); Dr. Farish A. Jenkins, Jr. (Museum of Comparative Zoology, Harvard University); Dr. Malcolm C. McKenna (Department of Vertebrate Paleontology, The American Museum of Natural History); Dr. Peter Robinson (Director, University of Colorado Museum/-Boulder); Dr. Wade E. Miller (Department of Zoology, Brigham Young University); and Dr. David P. Whistler (Los Angeles County Museum of Natural History). In addition to these committee members, Dr. Wann Langston (Laboratory of Paleontology, University of Texas/ Austin) and Dr. William A. Clemens (Department of Paleontology, University of California/-Berkeley) were also highly instrumental in developing an atmosphere for potential policy change. This surge of interest was reinitiated by the realization of an increasing loss of paleontological data base due to construction and energy production programs on federal lands.

On November 9, 1976, a symposium entitled "Paleontology and the Law" was held during the SVP annual meeting in Boulder, Colorado. The intent of the Department of the Interior to seek further legal counsel on removing paleontological field investigations from the permitting authority of the act was fully discussed at that time.

On December 30, 1976, and January 18, 1977, respectively, informal and formal requests were made by the Assistant Secretary for Fish and Wildlife and Parks to the Solicitor, to once again review the applicability of the act to fossil paleontological investigation, other than those specimens located within a cultural context. On January 19, 1977, a favorable response was received from the Deputy Solicitor based on new options and case law developments over the past 3 years.

Policy Alternatives

Presently, policy changes are in progress focusing upon the control of vertebrate paleontological field investigations occurring under the authority of the various land-managing bureaus. Such authority would be separate from the American Antiquities Act of 1906. We envision the Bureau of Land Management as the lead federal agency responsible for developing a comprehensive collecting permit program for paleontology with the assistance of the paleontological community. Such procedures would be developed within the context of the Bureau's responsibility for natural resources under the authority of the

Federal Land Policy and Management Act of 1976 (Public Law 94-579).

Until the various land-managing bureaus have developed rules and regulations and implementing procedures, and the Revised Rules and Regulations that govern the Antiquities Act are codified in the Code of Federal Regulations (target date 9/1/77), such investigations will continue to be authorized only by permit under the provisions of the act. At this time, the paleontological community seeks support for separate legislation combining the provisions of Public Laws 59-209 and 93-291 for their own threatened resource base including vertebrate, invertebrate, and perhaps paleobotanical remains.

Operation Townlift

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Some 80 percent of Townlift's projects deal with the revitalization of the core areas of small- to moderate-sized towns. Other projects encompass a variety of planning activities including the preparation of an architectural review criteria manual for Banner Elk, North Carolina; a highway corridor study of U.S. 129 between Knoxville and Maryville, Tennessee; a feasibility study for a town center in Trinity, Alabama; and a report investigating potential costs and funding sources for converting the old Tishomingo County Courthouse in Tishomingo County, Mississippi, to a museum and information center.

Planning

From the beginning, TVA took a unique approach to regional natural resource management by working whenever possible through existing state, county, and municipal governments. Operation Townlift has taken this same approach by working closely with established planning agencies at all levels of government, including the Tennessee State Planning Office, the Tennessee Municipal Technical Advisory Service, chambers of commerce, and local planning commissions. After an initial request for assistance from a community, one or two Townlift staff members visit the town to become familiar with its physical layout and to meet leaders from the public and private sectors. The mayor of the town often appoints a Townlift Committee composed of a broad range of citizens who identify problems and goals for the Townlift program and who formulate strategy with the assistance of the Townlift staff. Public meetings are held to get citizen input. Existing planning documents, such as local redevelopment plans, regional planning studies, and transportation needs studies, are examined and integrated into the Townlift plan. An analysis is made of present and future needs, and a staged program of implementation is prepared. The proposals for central business districts often deal with circulation problems, the creation of off-street parking, recommendations for placing overhead wiring underground, and downtown beautification including appropriate signage and graphic standards. The recommendations are normally conceptual in nature allowing future detail

drawings to be prepared by private consultants. Where historic properties are concerned, Townlift's staff recommends that paint colors and building materials utilized in renovations be in keeping with the historic character of the buildings and that a property owner who needs to clean his building consult a professional to determine the best and least destructive cleaning method before proceeding. If a town's architecture is rather nondescript, the Townlift staff may recommend painting pivotal buildings with bright colors, as they did in Gainesboro, Tennessee by painting super graphics directly on the buildings instead of adding signs.

Funding

The Operation Townlift staff also helps the local citizen group to identify sources of funding. Many projects are funded entirely from local revenues. The greatest source of outside funds for Townlift projects is HUD's "hold harmless" funds under the Community Development Block Grant Program. TVA's economists and planners recommend other sources of funding as well, including EDA Title X funds from the Department of Commerce and Office of Archeology and Historic Preservation Grants-in-Aid from the Department of the Interior (the old Tishomingo County Courthouse is included in Mississippi's FY 1977 Apportionment Warrant).

After completing these planning steps, the Townlift staff usually helps the community prepare a report for local distribution. It is then up to the local citizens to implement the proposals with help and advice from TVA. The entire planning process is generally completed within several months. Over 50 percent of Townlift's studies are implemented, to some degree; and those not implemented are largely because of lack of funds.

In November 1976, John Scheibe, Head of the Townlift Planning Section of TVA's Regional Planning Staff, visited the Office of Archeology and Historic Preservation along with Jim White, a TVA planner, and Max Ramsey, the alternate Federal Representative for the agency. Operation Townlift, with its annual operating budget of approximately \$500,000, provides a good example of how a relatively small program can spread its influence and expertise to as many communities as possible by working within the existing governmental framework, getting the local citizenry involved, and maintaining complete flexibility of approach.

The editors are happy to announce that 11593 has received an "Award of Achievement" from the Society for Technical Communication, in the category of bulletins, during the society's recent publications competition.

ADVISORY COUNCIL'S "NO ADVERSE EFFECT" GUIDELINES

The Advisory Council on Historic Preservation has recently issued "Guidelines for Making Determinations of 'Adverse Effect' and 'No Adverse Effect' for Archeological Resources in Accordance with 36 CFR Part 800." These are reproduced in full below.

Archeological properties included in or eligible for inclusion in the National Register of Historic Places are generally nominated under National Register Criterion "d" (36 CFR Part 60.6) which states that a property may qualify if it has "yielded, or may be likely to yield, information important in prehistory or history." While disturbance of archeological properties should be avoided, under certain circumstances, properties primarily significant for the data they contain can be said to realize their significance when this data is retrieved in an appropriate manner.

In such cases where a Federal undertaking (36 CFR Part 800.3(c)) can result in the recovery of data from an archeological property on or eligible for inclusion in the National Register of Historic Places, the Agency Official should take the following steps to decide whether a "no adverse effect" determination can be made:

The Agency Official shall, in consultation with the State Historic Preservation Officer (SHPO), apply the criteria set forth in Part I below. If these criteria are not met, the Agency Official shall comply with the procedures set forth in 36 CFR Part 800.4(e) *et seq.* If the criteria are met, the Agency Official may issue a determination of no adverse effect for any data recovery program conducted in accordance with the requirements set forth in Part II below. Documentation that the criteria and requirements set forth in Parts I and II below have been met, along with the comments of the SHPO, shall be forwarded to the Council for review in accordance with 36 CFR Part 800.4(d).

Part I Criteria

1. The property is not a National Historic Landmark, a National Historic Site in non-federal ownership, or a property of national historical significance so designated within the National Park System.
2. The SHPO has determined that in-place preservation of the property is not necessary to fulfill purposes set forth in the State Historic Preservation Plan.
3. The SHPO and the Agency Official agree that:
 - a. The property (including properties that are subsidiary elements in a larger property defined in Criterion 1) has minimal value as an exhibit in

place for public understanding and enjoyment;

- b. Above and beyond its scientific value, the property is not known to have historic or cultural significance to a community, ethnic, or social group that would be impaired by the retrieval of data;
 - c. Currently available technology is such that the significant information contained in the property can be retrieved.
4. Funds and time have been committed to adequately retrieve the data.

Part II: Data Recovery Requirements

1. The data recovery will be conducted under the supervision of an archeologist who meets the "Proposed Department of the Interior Qualifications for the Supervisory Archeologist (Field Work Project)."
2. The data recovery will be conducted in accordance with "Professional Standards for Data Recovery Programs."
3. A specified date has been set for completion and submission of the final report to the Agency Official.
4. Plans have been made for disposition of the material recovered after they have been analyzed for the final report.
5. Regarding the status of the affected property, documentation of the condition and significance of the property after data recovery will be provided the Agency Official and SHPO for forwarding to the National Register of Historic Places for action to include nominations, boundary changes or removal of National Register or eligibility status, in accordance with National Register procedures (36 CFR Part 60.16 and 60.17).

IMPLEMENTATION OF THE GUIDELINES FOR DETERMINATION OF "NO ADVERSE EFFECT" FOR ARCHEOLOGICAL PROPERTIES

At the request of the Advisory Council on Historic Preservation, the staff of Interagency Archeological Services (IAS), Washington, will comment to the Council on Historic Preservation on agency determinations of "no adverse effect" based on the preceding guidelines. It is important, therefore, that the IAS approach to these guidelines be understood. Because IAS represents the Secretary of the Interior with respect to the Archeological and Historic Preservation Act of 1974 (Public Law 93-291), and thus develops guidelines for, receives reports on, and reports to Congress about archeological data recovery activities, the staff is concerned about the processes by which agencies arrive at decisions to salvage archeological sites rather than preserve them in place.

The conclusion that archeological data recovery is a viable method of impact mitigation does not automatically justify a determination of "no adverse effect."

Such a determination is justifiable only when it is clear that, all else being equal, data recovery is the **best technical treatment** that can be provided. The decision about what constitutes the best technical treatment is an entirely professional one; administrative and political convenience should not be issues. In essence, the guidelines direct the archeologist, the agency, and the State Historic Preservation Officer (SHPO) through a decision-making process aimed at answering one critical question: **If the proposed action did not impact this property, would it be feasible and desirable to preserve the property in place?** If the answer to this question is "no," a determination of "no adverse effect" is in order; if the answer is "yes," then data recovery constitutes a compromise between the best technical treatment of the site (preservation) and other social needs (the project); in such a case compliance with the full consultation procedures set forth in 36 CFR Part 800 is appropriate.

Extracting Significant Data

Answering this question requires that the cultural value of the property be fully understood; this understanding should be reached during the determination of eligibility or nomination process, when the significance of the property is fully explored. The SHPO should then be in a position to apply Criteria 1, 2, and 3a and b of the guidelines. Criterion 3c requires substantial understanding not only of the property and the data it contains, but of archeological theory and method. One must be able to define the significant data likely to be present in the property and determine whether the technology is available to fully extract those data. Here there is considerable room for professional judgment, and a rule of reason must be applied. It is possible to argue that there will never be enough technology to extract all the information from an archeological property, but this argument leads to no useful conclusion. Since archeological research is a study of the relationships among the attributes of an archeological property or properties, those sites that contain very few attributes, or attributes linked by relatively simple relationships, are more likely to be fully understood using current technology than are more complex properties. As the number of attributes or attribute classes increases, or as the complexity of the relationships among attributes increases, the likelihood of fully extracting the significant information contained in such relationships using current technology decreases proportionately. The point at which site complexity is such that it makes it impossible to extract all significant information using current technology must be carefully and professionally defined, and the basis for this definition should be documented. Further, some attributes are themselves too complex, or too poorly understood, to yield all their potentially significant information to current forms of analysis; some attributes of soil chemistry, fossil pollen, and plant macrofossils fall into this category, for instance. If such attributes

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are important to the understanding of the site, it will probably be inappropriate to assume that they can be fully understood using current technology, and a determination of "no adverse effect" will thus be inappropriate. In short, we envision the "no adverse effect" option being properly used in such cases where relatively simple archeological sites are involved — surface sites and sites restricted to the plowzone in agricultural areas, for instance.

We also believe that certain other factors not explicitly set forth in the guidelines may justifiably be considered in reaching a determination of "no adverse effect." For example, if in the absence of the impacting project the property could still not be preserved, it seems fair to say that the project will have no adverse effect. Such a condition might exist, for instance, in a case where a site was subject to severe natural erosion, vandalism, or impact by nonfederal construction or land-use. If such conditions are to be considered as a basis for a "no adverse effect" determination, however, they should be clearly documented and it should be shown that there is no way to alleviate them other than through data recovery.

Data Recovery Plan

In proposing the program that will be undertaken to recover data from an archeological property, it is not informative simply to state that the data recovery requirements set forth in the guidelines will be met. In order for any competent professional to determine the adequacy of the program proposed, a reasonably detailed plan for the program should be provided. The data recovery plan should relate directly to the categories of data defined as significant in the nomination or determination of eligibility, and to any data recovery priorities defined in the state historic preservation plan or other regional archeological planning documents. The amount of funds and time needed to undertake the data recovery program should be fully assessed, and the commitment of such funds and time should be clearly documented.

As a general matter persons who may have an interest in the property or its data should be informed when a determination of "no adverse effect" is proposed, and should be afforded the opportunity to provide comment concerning the determination. Such persons might include, but are not limited to, archeologists who have investigated the site or the area in which it exists and local groups who might have nonarcheological interests in the cultural significance of the property.

SURVEY FUNDED BY FHWA

by Mark R. Edwards
Historic Sites Survey Coordinator,
Maryland Historical Trust

In March 1976, the Maryland Historical

Trust (MHT), the Maryland Department of Transportation (MDT), and the Interstate Division for Baltimore City (IDBC) of the Federal Highway Administration (FHWA) signed a much-needed agreement to undertake historic reconnaissance studies for proposed Baltimore interstate highway projects in the early stages of project planning. This represented a significant step toward improving the cooperative efforts between the MHT, which is responsible for administering the state's historic preservation program, and a federal agency that must take historic properties into consideration for its Environmental Impact Statements.

The need for such a contract was underscored by estimates of the MHT on the number of uninventoried historic properties throughout the state and by the costly delays in transportation projects resulting from the lack of data on these properties along existing and proposed rights-of-way. Estimates indicated that only 14,000 (25%) of the historic properties in Maryland have been inventoried and only 300 (10%) of the properties eligible for inclusion in the National Register have been nominated. Thus, any transportation project in the state would be likely to affect one or more of the nearly 42,000 (75%) uninventoried historic properties, or the 2,700 (90%) properties eligible for listing in the National Register.

In order to collect the data needed on these sites in the early planning stages of projects (something the MHT could not do because of staff and time limitations), MDT proposed a contract between MDT and the MHT using FHWA Highway Planning Research funding. A \$40,000 contract for work through December 1976 was signed.

The survey, which began in July, was conducted by four architectural historians whose headquarters were in the IDBC office in Baltimore. Survey work was coordinated by the Chief of the Environmental Division of IDBC and myself. Included in the scope of work of the contract were:

1. preliminary field reconnaissance of the corridors;
2. preliminary listing of historic sites within the corridor by category (whether the site was of local, state, or national significance, and whether it was listed in the National Register or being considered for listing);
3. preliminary evaluation of alignment site involvement (a preliminary attempt to evaluate the impact of each alignment);
4. development of historical information on sites with Section 4(f) involvement;
5. development of historical information on sites potentially eligible for the Register; and
6. final determinations of effect on sites listed in the National Register or eligible for listing (by the State Historic Preservation Officer, State Highway Administration, or FHWA).

Formal meetings with those involved in the survey were held at least once a month.

Because IDBC was the group most affected by delays, especially on two projects that were nearing construction, four priority areas were quickly delineated within the 9.9-mile project area: 2.3 miles of City Boulevard, 0.4 miles of I-395, 3.7 miles of I-70 and I-170, and 3.5 miles of I-83. Although surveys within two of the priority areas have been completed, work continues on the other areas, and two 3-month extensions have been approved.

The second phase of the contract provides for the retention of a qualified archeologist to undertake a preliminary reconnaissance of an area that had not previously been surveyed for archeological potential. Any historic and prehistoric sites identified during the reconnaissance of Phase I are to be surveyed during Phase II. Four sites identified by the MHT in the I-83 and City Boulevard corridors are to be tested, and the archeologist is now surveying the Gwynn Falls area of the I-70 corridor, but has not yet identified any potential sites there. The archeologist's contract has been extended through this year and major sites involved will be further studied by contract.

The information gained from the survey and testing will be integrated with other archeological data for use in Environmental Impact Statements required for the project area. For future projects, the FHWA has agreed to hire an archeologist to be on hand for project surveys; ideally, the services of an archeologist should be included in construction contracts.

Tangible results of the survey and earlier efforts to comply with environmental and preservation regulations in the project area included rerouting of portions of the highway and the elimination of a large interchange. Another less visible, yet important effect of compilation of the needed data is that it has allowed the IDBC, FHWA, and the SHPO to deal more quickly and efficiently with the problem of mitigation of adverse effect of highway construction on properties eligible for the National Register.

A similar contract, with the State Highway Administration, has been proposed for a \$100,000 survey to be fully funded by FHWA, after expiration of the first contract. The methodology used and standards applied during the first contract will be specifically defined in this contract. Surveyors will be hired to continue survey work on selected state highway corridors, under a somewhat modified scope of work.

Although the first contract is specific and limited in that it applies only to highway corridors in Baltimore, the concept of state and federal agencies working together to accomplish common objectives is being used in other projects. The need for surveys of other larger highway corridors through Maryland has become apparent, and the response to possible future projects has been especially encouraging.

AUTOMATED MANAGEMENT OF DATA AND RESEARCH RESULTS ON ARCHEOLOGICAL SURVEYS

A PROPOSAL FOR DISCUSSION

by Thomas F. King
Archeologist, Interagency
Archeological Services
Wilford P. Cole, Chief, ADP Section

The use of automated data processing (ADP) for storage and retrieval of site inventory data has been widely discussed, and occasionally implemented in historic preservation. While this is obviously useful, we believe that for data on archeological resources, at least, it may be more important for planning purposes to keep track of a more general class of information—data on the level and quality of archeological surveys in particular areas, and on the locations of information sources.

It will be many years before the National Register is complete (if it can ever be said to be complete). Only then will it be usable as the sole documentary base for historic preservation planning in advance of land-modifying projects. In the interim, supplemental bodies of data are needed to facilitate application of the processes for compliance with Executive Order 11593, the National Historic Preservation Act, and the National Environmental Policy Act. The most frequently discussed form of supplemental data is the "inventory," which is usually defined as a body of information on properties known to the State Historic Preservation Office (or some other inventory-keeping body), but not yet evaluated for National Register eligibility. The inventory contains all sorts of data on historic properties, ranging from dots on a map to detailed reports, collected by private, local, state, and federal entities.

If a property listed in the inventory is endangered, then this triggers an evaluation response leading to a determination of eligibility and compliance with the procedures of the Advisory Council on Historic Preservation. Inventories, however, suffer from the same problems as the National Register—they are incomplete. Many areas of the country have never been "inventoried," and even where inventory data are available these data are not necessarily reliable. An inventory listing by itself provides no basis for considering the reliability or availability of the data. Even more important, the lack of an identified property in a given area does not necessarily mean that there is nothing there. The inventory provides no way of differentiating between areas that have been closely surveyed and found wanting and areas that have simply never been inspected.

Regarding archeological resources, at least, we believe the most useful interim planning tool that could be developed would be a body of consistent, com-

prehensible, updatable information on the quality of survey work that has been done in each part of the country, and on the disposition and availability of survey data and other useful information. Such a data base would supplement the National Register and the state inventories. This would permit an agency planning a project in a given location not only to find out what known archeological properties exist in the vicinity, but also to find out:

the level and intensity of archeological surveys that have been conducted in the vicinity;

what areas in the vicinity have actually been subjected to survey;

bibliographic citations to and locations of all reports of archeological fieldwork conducted in the vicinity; and

locations of all collections of primary archeological data, artifacts, etc., from surveys and excavations in the vicinity.

Using such a system would enable State Historic Preservation Officers and federal agencies to clearly determine the need for archeological surveys prior to particular projects, and to mobilize the necessary data to guide, supplement, or take the place of field surveys. Such a system would also permit SHPOs to more effectively plan their comprehensive statewide surveys. The following points might be useful in organizing such a system.

Design. The Nation should be subdivided into geographical units of some convenient size, but not so small as to make the task of data input unnecessarily difficult, or so large as to render them too general for use in planning. Quadrangles matching 7.5-minute USGS maps might be appropriate, or squares 10,000 meters on a side designated by UTM references. In consultation with the SHPOs, OAHP should develop a method of classifying archeological surveys regarding intensity, comprehensiveness, and reliability, and develop systems for coding the nature of survey coverage in each designated unit. The system should be capable of storing and providing information such as:

"Entire unit has been subjected to surface survey."

"Shovel testing has been done in about 1/16 of the unit."

"Three cursory surveys have been done but none has covered the entire unit."

It should also be possible to assign each unit a numerical rank based on the extent and quality of the survey work.

Input. Having established the system, OAHP and the SHPOs should arrange for compiling the data for input, as a part of the statewide planning process in each state. This would involve locating and

recording the nature of surveys in each unit, in accordance with the classification system, and providing information for each unit as follows:

Bibliographic references on all publications of archeological work within the unit.

Full references and locations on all unpublished reports of archeological work within the unit. If feasible, a copy of each report should be provided to OAHP for placement in the microfiche series maintained by the National Technical Information Service (NTIS). The NTIS designator would then be entered into the system. If access to a document must be limited in some way, this fact would also be noted.

Names and standardized descriptions of all archeological collections from the area, with notes about their locations and availability for study.

The SHPOs in adjacent states should be encouraged to pool their efforts; federal agencies should be encouraged to assist SHPOs as part of their responsibilities under Executive Order 11593, sections 2(a) and 1(3). It would no doubt take several years before a fairly comprehensive data base could be compiled; it would be appropriate to give first priority to units in areas of high development pressure or other potential adverse impacts.

Output. The system should be capable of:

printing out brief summaries of the level and nature of survey(s), and the location and availability of documentation and collections for any given unit, and

printing maps or map overlay sheets of states or other large regions showing the level and nature of survey in terms of numerical ratings for all units within the region.

We believe that developing such a system should be given high priority by OAHP and the states in connection with comprehensive state plan development. Initially, it seems most feasible to centralize the system in OAHP, using existing computer facilities and programming to maintain data input by the states, then providing output to the states and federal agencies on request. Eventually regional data collection centers might be developed.

We solicit comments, criticisms, and counter-proposals. Address comments to Thomas F. King, Archeologist, Interagency Archeological Services, Office of Archeology and Historic Preservation, National Park Service U.S. Department of the Interior, Washington, D.C. 20240.

NICKELODEON TO MOVIE PALACE:

A Selection from the Historic American Buildings Survey

by Lucy Pope Wheeler
Writer/Editor
Historic American Buildings Survey

In the history of cultural and architectural development of this country the hunger for theater was often so strong that local amateur groups sprang up to augment an otherwise very intermittent supply of traveling professionals. When a combination of amateurs and professionals drew growing audiences that could not be accommodated by the improvised stage and seating of a blacksmith shop, a courtroom, or a wagon loft, but commanded the larger space of a hotel ballroom or lodge hall, a taste for "dignity" and "refinement" crept in. This new sense of suitability reflected the practices of the ancient and recent historic past in which the grandeur of natural scenery or the gilded halls of royalty enhanced the art of dancer, masquer, dramatist and mime.

Architect Charles Bulfinch had forcefully felt this sense of suitability when, after attending the theater in New York for the celebration of George Washington's first Inaugural in 1789, he returned to Boston filled with ideas of what a proper theater should be, and ran straight into a law enacted in 1750 which prevented "stage plays and other theatrical entertainments." It took several years for Bulfinch, helped by such influential supporters as John Quincy Adams and Paul Revere, to circumvent the Act of 1750. In 1794 a spacious and elegant theater, designed and built by Bulfinch at the corner of Franklin and Federal streets, opened its doors.

New forms of theater developed with the country's growth until technology presented the public with a new kind of theatrical entertainment, the motion picture, which in turn created a new, uniquely American, architecture. Paralleling the development of early legitimate theater, the motion picture moved from penny arcade and peep show to storefront and nickelodeon, and finally to a structure all its own, which would reflect the exuberant imagination of both stage and screen — the Movie Palace.

The Movie Palace architect of the 1920s and 1930s was a man apart. Thomas W. Lamb, John Eberson, C. Howard Crane, and the firm of Rapp & Rapp were as sensitive as actors to the structure of the imagination; as adventurous and courageous as "Gothick" master builders; as canny as merchants who reckoned with the financial power of their producer-clients, as well as with the needs and anxieties of their client-audiences who were moving through a frightening world at a rate faster than they were prepared to go. It was for them that the architects designed structures whose elegance was once reserved for worship and for royalty.

For 43 years the Historic American Buildings Survey has produced and collected graphic and written records that document the history of the building arts in the United States. This architectural and historical research, and the models it has supplied to others working in this field, have provided a rational basis for the historic preservation movement.

To make these records more widely available, the survey publishes both reference catalogs and a series entitled "Selections From the Historic American Buildings Survey," which commenced in 1966 with *Historic Architecture of the Virgin Islands*. Many of the volumes in this sampling of HABS documents at the Library of Congress are based on projects that record threatened structures. Such is the case with the soon-to-be-released Volume No. 13, *Ten Twentieth Century Theatres: Nickelodeon to Movie Palace — 1910 to 1931*. Compiled and edited by A. Craig Morrison, a former HABS architect who is an avid theater historian, and Lucy Pope Wheeler, volume 13 will include historical narrative, architectural analysis, and both historic and recent photographs. In many cases, the data is accompanied by photographs of the original architectural drawings. HABS has been greatly aided in this project by local historical societies, libraries, theater managers, architectural offices, and by the Theatre Historical Society. *Nickelodeon to Movie Palace* documents the following ten structures:

THE ORIENTAL THEATRE, formerly 828 S. E. Grand Avenue, Portland, Oregon. Once the state's second-largest movie theater, the Oriental was completed in 1927 at the peak of Portland's movie-house building activity by local architects Lee Thomas and Albert Mercier. Decorated by internationally known Portland sculptor, Adrien Voisin, with designs based on East Indian and Angkor Wat motifs, it was demolished in 1970.

THE GRAND RIVIERA THEATRE, 92222 Grand River Avenue, Detroit, Michigan. Built in 1925 by Austrian-born John Eberson who came to this country in 1908 and became a nationally known designer of a distinct form of theater architecture, the Grand Riviera was an "atmospheric" theatre where the audience sat in a majestic garden beneath a trompe-l'oeil sky with floating clouds and twinkling stars — all mechanically controlled. The design was based on a mid-16th-century garden and octagonal palace built by the Italian Renaissance architect, Vignola, for the Farnese family. The Grand Riviera is now the property of Charles R. Kendricks, who used to own only the theater's peanut vending machines. He plans to restore the theater.

THE INDIANA THEATRE, 134 West Washington Street, Indianapolis, Indiana. Built in 1927 by the architectural firm of Preston C. Rubush and Edgar O. Hunter of Indianapolis, the Indiana has an elaborate churrigueresque white terra cotta facade which was the work of F. E. Gates Marble and Tile Company and architectural designer Alexander Sangernebo. The unique sixth-floor ballroom, designed after a popular dance tune of the day, "In a Little Spanish Town," was often used as part of the opening festivities for the Indianapolis "500" International Motor Speedway races. The future of the Indiana is in question.

THE FOX THEATRE, formerly at 20 Flatbush Avenue, Brooklyn, New York. Designed by C. Howard Crane for William Fox in 1928, the Fox represented the moving-picture theater in its most lavish phase. Stylistically it was the epitome of eclecticism, offering many elements from the East Indian, Burmese, Chinese, Classic, Baroque, Rococo, and Art Deco designs. Its near-5000-seat capacity was self-defeating when attendance declined to 100. It was demolished in 1971.

Photo: Lyle E. Winkle

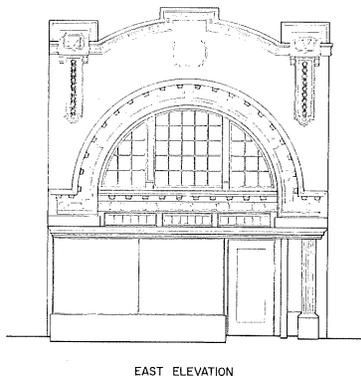


The Oriental Theatre

THE GARDEN THEATRE, 10-14 W. North Avenue, Pittsburgh, Pennsylvania. Built about 1915 by a Pittsburgh architect, Thomas H. Scott, whose major work is the Machesney (now Benedum-Trees) Building in downtown Pittsburgh, the Garden Theatre is a typical, little-changed example of a neighborhood movie house, with the nickelodeon air of the early 1900s. The Garden prides itself on never having closed, except to mourn the death of its manager, Bennett Amdur. Rather than spoil Amdur's record, the Garden has bowed to the fiscal necessity of adult movies, which it advertises as discreetly as possible.

THE PARAMOUNT THEATRE, 2025 Broadway, Oakland, California. A masterpiece of Art Deco design, the Paramount is a prime example of avant-garde theatre architecture from the early 1930s. Designed by San Francisco architect, Timothy L. Pflueger, its facade tower is covered with a colorful mosaic mural. Its interior is derived from the verbal imagery of William Henry Hudson's *Green Mansions: A Romance of the Tropical Forest*. This theater also exhibits the influence of Pflueger's professional colleague and personal friend, the great mural artist from Mexico, Diego Rivera. The Paramount was bought by the Board of Directors of the Oakland Symphony Orchestra in 1972, and was restored, opening as the Paramount Theatre of the Performing Arts in 1973.

Drawing by Andrew Craig Morrison, for HABS

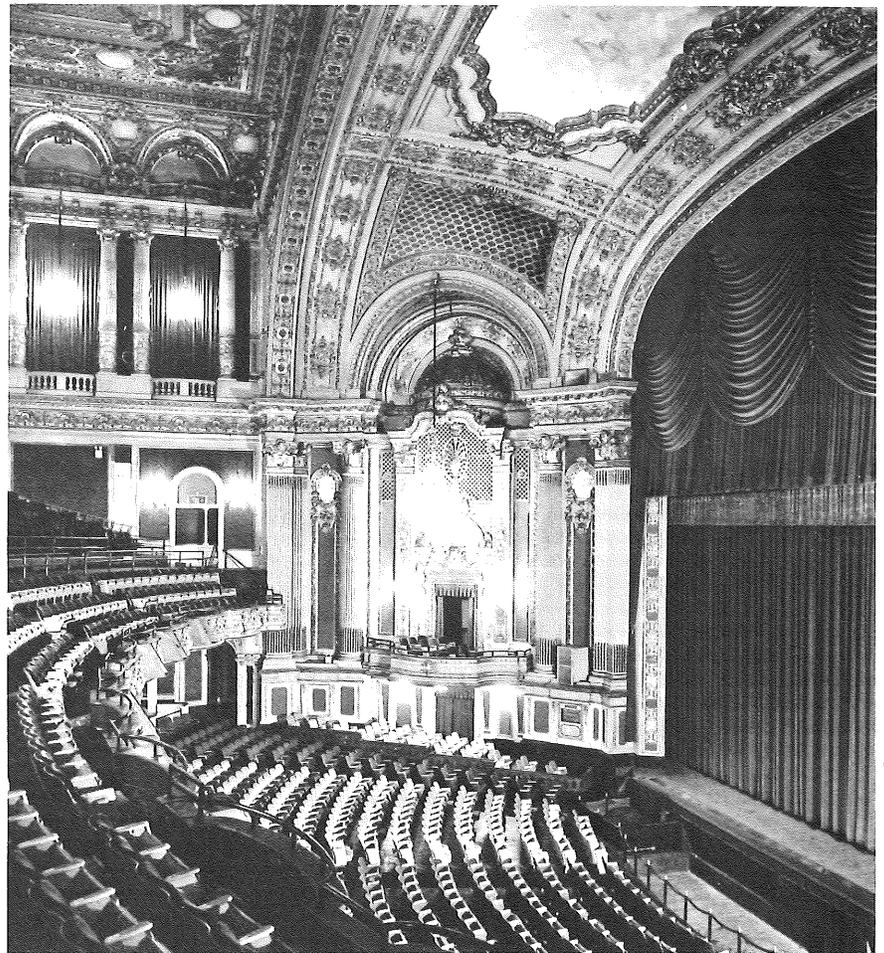


EAST ELEVATION

918 9TH STREET, NW MOUNT VERNON THEATRE WASHINGTON DISTRICT OF COLUMBIA

The Mount Vernon Theatre

THE MOUNT VERNON THEATRE, 930 9th Street NW, Washington, D.C. Formerly a nickelodeon designed and built in 1910 by A. B. Mullett & Sons, the Mount Vernon is a modest structure whose light-bulb studded, arched facade has been recorded by HABS with a measured drawing. The Mullett firm was founded by Alfred B. Mullett who had been the Supervisory Architect of the Treasury, and was responsible for the Old United States Mint in San Francisco, and the State, War, and Navy Building and the south wing of the U.S. Treasury in Washington. The theater structure is now a print shop, painted black.



The B. F. Keith Memorial Theatre

The AL. RINGLING THEATRE, 136 4th Avenue, Baraboo, Wisconsin. Opening in November 1915, the theater was built for Al. Ringling of the circus family. The Ringling Theatre was designed by Chicago's Rapp & Rapp, one of the largest architectural firms in the country specializing in theater design. One of the first examples of the elegant motion picture theater in this country, the Ringling Theatre, which seats only 1,000, derives essentially from the little opera house at Versailles. It hosts local drama groups, the New York Shakespeare Company, and recently revived old-time vaudeville.

ORCHESTRA HALL, Woodward Avenue at West Parsons Street, Detroit, Michigan. Built originally to obtain Ossip Gabrilowitsch — the famed Russian concert pianist and orchestra conductor — as permanent director of the Detroit Symphony Orchestra, Orchestra Hall was built in 1919 from the design of C. Howard Crane, a Detroit architect who became one of the most notable architects for the Movie Palace. Crane equipped Orchestra Hall with a projection booth for motion pictures; later, as the Paradise Theatre, it offered the best in concert jazz and movies. Orchestra Hall is about to make a spectacular comeback as an educational and exhibit center for the performing arts, and as a memorial to Ossip Gabrilowitsch and Detroit's cultural heritage.

THE B. F. KEITH MEMORIAL THEATRE, 543 Washington Street, Boston, Massachusetts. This Keith theater is one of the finest examples of the moving-picture palace at the apogee of its development. It memorialized, in Baroque grandeur, B. F. Keith, the originator of fine vaudeville entertainment, and the founder of Keith, Keith-Proctor, Keith-Albee, and Radio-Keith-Orpheum (RKO) theaters. Designed by Scottish-born Thomas W. Lamb, who became another of the foremost American theater architects of the day, the Keith, constructed with entrance, has been altered into a double movie theatre, The Savoy 1 and 2.

Nickelodeon to Movie Palace offers a selection of movie theaters that have had to struggle to survive; of theaters that have been carefully maintained and cared for; of theaters that have been rescued and restored to new life; and of theaters that have been lost. Some of these theaters still stand as evidence of the practicality of "re-cycling." With the clinching argument that a ready-built theater, worth \$40,000,000, can be acquired and restored for \$4,000,000, Movie Palaces survive as viable examples of "preserving, restoring and maintaining the historic and cultural environment of the Nation."

SBA URBAN NEIGHBORHOOD REVITALIZATION PROGRAM

by Donna Williams
Program Assistant, National Register

The Oldtown Mall in Baltimore, Maryland is the type of project for which the Small Business Administration's (SBA) new Urban Neighborhood Revitalization Program has been established. Oldtown, an early-19th-century shopping district which had deteriorated greatly over the last 50 years, was brought back to life as a downtown shopping mall through the active, cooperative intervention of the city's Department of Housing and Community Development and local merchants, using SBA loan and other city and Federal funding programs.

Since 1969, when redevelopment began in Oldtown, many of the area's commercial buildings have been rehabilitated, cars have been banned in the main shopping area, convenient parking areas have been provided and a pedestrian plaza created and landscaped. These innovations make the area an attractive and convenient place for residents of the immediate area to shop and allow the area to compete with suburban malls for the business of the larger metropolitan area.

Eager to encourage other commercial revitalization schemes like Oldtown, the SBA established the National Urban Neighborhood Revitalization Program (NUNRP). The program was designed to stimulate commercial and industrial revitalization and encourage private investment in urban areas. Although initiated in only 11 target cities in August 1976, the NUNRP has become a nationwide effort, especially aimed at cities with populations over 25,000. Preservationists may be able to use assistance and loans available through this program in working with urban commercial areas.

Nonprofit Organizations

To implement this new program, SBA contracted with two private nonprofit organizations founded in 1970, which are concerned with economic revitalization. The National Development Council (NDC), dedicated to expanding economic development in low-income communities, and the National Center for Urban Ethnic Affairs (NCUEA), which works to promote neighborhood revitalization in urban working class and ethnic communities, have been working with the SBA on the Urban Neighborhood Revitalization Program. Together, they provide community groups and municipalities interested in urban revitalization with assistance in identifying potential revitalization areas, establishing local development companies, and preparing loan applications; assistance in public relations and neighborhood organization is also provided.

The NDC and NCUEA have found that three ingredients are essential for a successful urban revitalization program: a

city with the interest and capability of making investments in the revitalization area, a commercial area that has revitalization potential, and merchants with an interest in a revitalized commercial environment. The NDC and NCUEA try to involve the business and public and private sectors in rehabilitation efforts. It is important for preservation groups and others to be involved in NUNRP projects from the earliest planning stages. Such revitalization projects will usually take a number of years to complete, and it is essential that preservation concerns are voiced before final plans are to be implemented.

Working with communities in the pilot cities and others, the NDC and NCUEA have assisted and encouraged a number of communities to begin major commercial revitalization projects, although all are still in the planning stages. Pittsburgh, for example, is planning to revitalize an old commercial area on the city's south side in conjunction with preservation groups, merchants, community associations, and others. The Federal Hill revitalization area in Providence, Rhode Island has generated \$1 million of investment in the project and the city has committed itself to \$2.5 million in public works in the area, including new street lighting, services, and a public square which will be used for special events, outdoor vendors, and the like. The SBA hopes to stimulate a total of \$250 million in private investment in urban commercial areas by the fall of 1977 through the use of its loan programs and the initiation of revitalization efforts in major cities.

Loan Programs Involved

The Urban Neighborhood Revitalization Program utilizes \$30 million that SBA has made available for direct loans under several of its loan programs for use specifically in NUNRP projects. An additional undisclosed amount is available for loan guarantees. SBA loan programs that have been specifically named to cooperate in the NUNRP are the Section 502 Local Development Company Loans, 7A Business Loans, and Economic Opportunity Loans (EOL). Combined, these programs can provide support for acquisition of property, facilities, or machinery; construction; rehabilitation and working capital for eligible small businesses. The section 502 loan program is the key to the NUNRP because loans and rehabilitation projects are coordinated through qualifying local development companies.

Under section 502, the SBA makes loans or loan guarantees to development companies which use the funds to provide property, buildings, or machinery to small businesses in the community. The local development company can rehabilitate or construct the facility and rent or sell it to the business, or can loan the funds to the business involved for direct expenditure for allowable projects. To qualify under section 502, a local development company is required to provide 10-20 percent of the project cost. This can be raised from private or public (municipal, state or federal) sources through the sale of stocks or bonds or through grants or private loans. In apply-

ing for loans or guarantees, the development company must provide certified evidence that requested funds are not available through private lending institutions. Loans for a maximum of \$500,000 for a period of up to 25 years are allowable under section 502.

7A Business Loans and Economic Opportunity Loan Programs provide loans or loan guarantees for up to \$100,000 for between 6 and 15 years depending on the type and use of the loan. These loans can be used for land or machinery acquisition, construction, rehabilitation, and working capital as well. The EOL program is specifically designed to assist low-income or disadvantaged persons who lack the opportunity to start or strengthen a business; they are allowed more flexible credit terms than under the 7A Business Loan Program. As with the section 502 program, direct loans will be made only if loans are not available through private lending institutions.

For more information on the National Urban Neighborhood Revitalization Program, contact the local office of the Small Business Administration or the National Development Council, 1421 29th Street NW, Washington, DC 20007.

AMERICAN ARCHITECTURAL ARCHIVES

by C. Ford Peatross
Prints and Photographs Division,
Library of Congress

The Prints and Photographs Division of the Library of Congress houses the most extensive existing collections of visual and historical documentation on American architecture and engineering. The Library's architectural collections are too numerous and extensive to survey in this brief notice. Therefore, the focus herein will be on the three most important collections which deal with buildings in the United States and its territories and possessions: the Pictorial Archives of Early American Architecture (EAA), initiated by the Library in 1929; the deposit records of the Historic American Buildings Survey (HABS), begun in 1933; and the deposit records of the Historic American Engineering Record (HAER), begun in 1969.

It is especially appropriate that of the traditionally defined "fine arts" (architecture, painting, and sculpture), it has been architecture to which the Library has devoted its collecting energies. Architecture was the one such discipline in which Thomas Jefferson, in so many senses the Library's founder, practiced and achieved distinction. From the acquisition of Jefferson's own annotated copy of the first Renaissance treatise on the art of architecture, Alberti's *de reaedificatoria*, to the continuing deposits of records by HABS and HAER, the Library's architectural collections have continuously expanded until they have become the most important in the nation. The endeavors of man in architecture and engineering are unequalled as the tangible expression of

the origins, development, and aspirations of a nation and its people; thus the documentation of this building tradition available in the Library of Congress provides a priceless reflection of and source for the study of American civilization.

The very special role played by the Library in the recording of America's historic buildings began in 1929, when Leicester B. Holland, a scholar well versed in the history and practice of architecture, came to head the newly named Fine Arts (now Prints and Photographs) Division of the Library of Congress. Dr. Holland wasted little time in securing a grant from the Carnegie Foundation to establish in the Library the Pictorial Archives of Early American Architecture (known as EAA), which acquired by gift, purchase, and active national solicitation photographic negatives and prints documenting historic structures all across the United States. By 1941, EAA had grown to include several thousand items, but more importantly it had laid the groundwork for a far more important and ambitious project also supported by Dr. Holland and the Library. That project was the Historic American Buildings Survey (HABS), a Civil Works Administration program begun in 1933 in association with the Library and the American Institute of Architects to put unemployed architects and photographers to work recording our architectural heritage. At one point in the 1930's the program engaged over 750 architects in making measured drawings of buildings and sites all over the United States.

After becoming a Works Projects Administration program under the supervision of the National Park Service of the Department of the Interior, HABS continued to produce records for deposit in the Library until 1942. HABS resumed those activities, after a 15 year hiatus, in 1957, and has now documented approximately 17,000 structures in over 35,000 sheets of measured drawings, 45,000 photographs, and 15,000 pages of historical and architectural data.

Since 1969 the HABS records have been supplemented by those created by the Historic American Engineering Record (HAER), which, in association with the American Society of Civil Engineers and the Library, works to document landmarks of American engineering using the same tools as HABS: measured drawings, photographs, and historical and technological descriptions. Still in its infancy, HAER is just beginning to transmit large numbers of records to the Library.

The Library's most significant contributions to these three collections have been in making them easily accessible to all types of researchers by means of the Shelf-List Index system which it originally developed for its own EAA collection and through extensive subject, architect, and bibliographic card indices.

The Library's Shelf-List Index organizes materials from all three collections geographically by state, county or vicinity, and then alphabetically by building name. Thus, a researcher or reference staff member can rapidly determine if the Library has any records of, for

instance, the Glessner House, the Reliance Building, or the First Baptist Church in Chicago, Cook County, Illinois. Having determined the type and number of records available from the index card for the structure in question, the individual can easily retrieve either reference copies or reproductions to be sent to the Library's Photoduplication Service. This is possible because the Library assigns a common Index number to all such records for a particular structure or building project.

The Prints and Photographs Division also maintains card indices for over 2,000 architectural subjects as well as for architects (or firms) represented in the architectural collections. In addition, there are bibliographic indices for both architectural subjects and geographic areas, and supplemental card indices which guide researchers to additional visual documentation within other collections in the Division. Thereby, with reference assistance, a researcher can

find, for example, illustrations of Jefferson's home, Monticello, which occur in over 15 divisional collections besides EAA and HABS.

All of the materials in EAA, HABS and HAER are available for public reference during the regular hours of the Prints and Photographs reading room in the Jefferson Building. There are no restrictions on the publication of these materials, and an average of 6,000 items from the three collections are ordered from the Library each year.

ERRATA

There was an error in the article on "Saving Older Urban Neighborhoods," by Kenneth Dobson in the February issue of *11593* (Vol. 2, No. 1, page 14). The second sentence of the fourth paragraph should read: *Few* of the older cities in the country, particularly in the northeast, fall into the first category.

ADAPTIVE USE PUBLICATIONS

Concern for the reuse of architecturally historically significant buildings has become widespread, not only among preservationists, but also among a great many architects, government administrators, bankers, and developers who have been faced with the spiraling costs of new construction. The proliferation of publications on the subject, especially in the past two years, reflects the growing awareness that many older buildings can be successfully and economically "recycled" and put to good use.

Reports Available

Several informative reports on this subject have been produced by the Educational Facilities Laboratories (EFL), with funding provided by the Architectural Environmental Arts Program of the National Endowment for the Arts. The Architectural and Environmental Arts Program was created "to support exemplary design efforts and to stimulate active public interest in the quality of the built environment," and the EFL was established as a nonprofit organization by the Ford Foundation in 1958 "to encourage and guide constructive changes in education and related facilities."

Reusing Railroad Stations (\$4) was initially published in May 1974 (reprinted September 1975). Although the 79-page study concentrates on the reuse of railroad stations—threatened structures which earlier played an important role in the development of many American towns and cities—the information may be applied to reuse in general. Included are sections on the value of stations as man-made resources, the idea of reuse and case studies describing how it is working, sources of economic assistance, the need for federal leadership, and a brief historical background on the growth of the railroads.

An enthusiastic response to this report led to publication of the 59-page *Reusing*

Railroad Stations, Book Two (\$4), in September 1975. It does not duplicate information in the first book, but provides case studies on the reuse of several stations, outlines the principles of successful project development and controlling costs in reuse development, and gives sources of financial assistance. Both publications are richly illustrated with black-and-white photographs, and the second report contains several architectural drawings and financial charts.

The Arts in Found Places (\$7) deals with the use of surplus space by various arts activities and how this use has helped to stabilize and upgrade many communities. The 138-page report, published in March 1976, includes sections on recycling old spaces for new uses, locating space to suit the needs of your organization, cities and neighborhoods that have found space for the arts, and the nuts and bolts of recycling for the arts; it also contains numerous photographs as well as a list of information sources and other arts-related publications.

The most recent (July 1976) report, the 72-page *Surplus School Space: Options & Opportunities* (\$4), is a smaller format publication dealing with the problem of vacated and underused school buildings that are becoming available for uses other than education. Discussed in detail are numerous reutilization projects, options to consider when planning reuse, and current trends in the availability and use of these buildings.

The reports are all available from EFL, 850 Third Avenue, New York, NY 10022.

Bibliography on Reuse

Titles of many of the publications on reuse are listed in "A Selected Bibliography on Adaptive Use of Historic Buildings," a six-page reading list recently compiled by Technical Preservation Services of OAHF. Copies of the list and others on preservation technology may be obtained by writing to the Branch of Preservation Technology, Technical Preservation Services, National Park Service, US Department of the Interior, Washington DC 20240.

by Wilford P. Cole
Chief, ADP Section

THE SERIES

States and federal agencies frequently request advice from OAHF's ADP Project on automation of inventory files. "ADP Notes" will appear in regular issues of 11593 as a means of sharing OAHF's experience and to stimulate discussion. We hope to gather ideas and reactions from readers. Please address correspondence to Wilford Cole, ADP Project, Office of Archeology and Historic Preservation, National Park Service, U.S. Department of the Interior, Washington, DC 20240. Among the topics to be covered soon will be:

Observations on planning for inventory automation

Definition of terms

Suggested formats and editing rules for commonly-recorded data elements* (dates, UTM references, state and county codes)

Notes on problems encountered in

OAHF's projects, and their solutions. Positions stated in "ADP Notes" are not necessarily policy statements from OAHF, but should be regarded as suggestions and opinions reflecting the experience of the OAHF staff in dealing with information management problems by computer.

PLANNING FOR AN AUTOMATED INVENTORY FILE

The ADP Plan

Before dealing with how-to details, the questions of whether or not to automate an inventory file and how to plan for automation should be discussed. Considering the costs and scale of effort involved, decisions must not be made lightly, and should be supported by careful analysis leading to achievable plans.

There are many reasons for automating an inventory of cultural sites. Automation can make it easier to answer questions, compile lists, synthesize diverse information, and correlate files. It can simplify management of the inventory itself by aiding in the review of data, eliminating redundancy, and facilitating cleaning and updating files. It can also increase the effectiveness of the inventory by making it easier to monitor progress and by providing other administrative data. Automation should be considered when the manual management of the inventory strains available resources, or when the inventory's effectiveness as a preservation tool could be improved by new methods.

It would be pointless to begin an inventory automation project without thorough knowledge of the inventory: how large it is and how fast it may grow, how it is operated and for what purposes, how its functions may evolve from internal needs and external pressures, what functions served by inventories in other agencies may be desirable to adopt, how inventory information is intended to function in the bureaucratic environment and what

changes would be desirable, what data elements are contained within inventory records* and what roles they could play in retrieval and reporting techniques, reliability of data and consistency of notation, and the proper balance between planning, scholarly, and antiquarian information. These and other factors will be different in each agency.

Further analysis is needed to determine the implications of automation goals on software* and hardware* selection and on data management arrangements. The latter include organization of labor; flow of work through the office; security, integrity, and maintenance of the files; manual editing before conversion of data to machine-readable form; automated checking of input data; procedures for handling automated data; required minimum and allowable maximum response times for queries. Carefully derived cost estimates are necessary for data editing, transcription into machine-readable form, costs of computer operation (storage, processing, printing), personnel requirements (how many people at what skill levels), office space and equipment, consultant fees, travel, telephone costs (for data transmission and consultation), and supplies. There must be no last-minute surprises.

Although these planning factors are difficult to deal with, written documentation is necessary before justifiable decisions can be made on some of the more visible planning issues: coding forms and formats, choice of ready-made software, fixed report formats, and the like.

It is not satisfactory to acquire an ADP capability and then "see what can be done with it." We are often asked to recommend software packages based on their features. The author's conviction is that no software should be considered or recommended until a complete analysis has been performed, and that if inventory management is unwilling to undertake such studies it will be unable to produce a satisfactory automated inventory. Piecemeal, unplanned automation will inevitably lead to a mismatch between features and needs, and the resulting compromises, determined by the preselected programming packages, will degrade the effectiveness of the inventory. In other words, preselection of software puts the vendor, instead of the customer, in charge of the results.

All of this analysis and planning, admittedly tedious, is necessary for three additional reasons, all related to money. Before a project begins there must be assurance that adequate funding and personnel resources will be available to complete the work. A half-completed project will not help. It must also be certain that whatever means are adopted will, in fact, meet the goals of the project and that anticipated changes may be accommodated without disruption. Second guessing is very expensive. The project must be engineered to have a measurable positive impact on preservation in the shortest possible time, to insure continued annual funding. Nothing is more discouraging than having to make excuses for non-performance after the second or third

year of work. Without a plan, these three objectives are unlikely to be met.

Our suggestion is that the automation plan be based on the following outline, or one similar to it covering the same points:

1. Overall goals of the ADP project
2. Objectives of each phase of work specified in the plan
3. Analysis of the current inventory and its problems
4. Detailed requirements for the automation project
5. Specifications necessary to meet the requirements
6. List of deliverable results, with delivery schedule
7. List of resources available and required
8. Definitions of terms.

Following approval of the plan by management, and a commitment of resources, implementation may begin along the well-defined path laid out in the plan.

ADP has a great potential for contributing to historic preservation. Along with that potential comes the risk that an inadequate automation project will deter preservation by failing to attain its goals, and by diverting scarce funding and personnel resources from more productive work. A good plan will minimize the risks by providing a well-documented basis for decisions.

How the Park Service Can Help

NPS cannot reasonably provide any existing software packages suitable for all applications, for the reasons given, and because of differences between the needs of each inventory. There are not adequate resources within NPS to develop such a universal system.

Within the limits of available staff time, however, OAHF can assist in developing an ADP plan. As part of this planning process, we can assist agencies in deciding on specifications for automation, and in evaluating proposed procedures, hardware and software, operating facilities, and other implementation factors.

TWO INVENTORY TRENDS

Two interesting trends have developed in the application of inventory data to land-use planning. Both affect automation of inventories.

In at least three states (MD, NC, RI) where there are statewide land-use planning authorities, central data banks of environmental information are being compiled or planned. Data from historic site inventories is being automated in a form compatible with data on soil structure, vegetation, demographics, and the like. Details differ between states, but the idea is for planners to be made aware of all environmental factors, including the cultural environment, at the beginning of their planning work. Comprehensive land-use planning on a statewide basis is a politically touchy issue, and automated comprehensive land-use data banks incorporating cultural site data are still uncommon. Clearly, though, by introducing

cultural factors in the earliest stages of a plan, they give planners the best opportunity to give preservation timely consideration. Stated another way, they aggressively insert cultural factors into the planning process in such a way that planners cannot justify ignoring them.

The other trend is better known: the inventory, manual or automated, is brought into play when planners request information during formation of a plan, or during environmental impact review after a plan is drawn up. This puts cultural resource information in a passive relationship to planning, where it only reacts to a planning action after the fact and upon request.

Where it is politically and administratively feasible, the more aggressive trend is likely to make cultural factors more strongly competitive with other environmental factors in gaining planners' thoughtful consideration.

One effect of these trends is to set the style for inventory automation. Comprehensive land-use data banks concern themselves with identification and location of sites, and can be expected to have little room for "scholarly" information and historical details. In entering such a scheme, the automated inventory gains in effectiveness among planners, and loses in research potential and interest to a broader public. An automated inventory not incorporated in a land-use data base will have greater flexibility to serve objectives not related to land-use planning, but will lose some of its potential competitive planning edge. It is, of course, possible for an inventory to be automated to follow both trends simultaneously. The broader data for general use, if well planned, could be distilled by the computer programs to be transmitted in machine-readable form to the land-use data bank.

"BUT I DON'T KNOW ANYTHING ABOUT COMPUTERS"

Fifteen years ago, neither did most people. Computers have, nonetheless, become a fact of modern life. Even if we see the past as our working area, by definition historic preservation implies bringing the past into the future. The computer-assisted cultural resource inventory is clearly a powerful tool for preservation.

Power imposes an ethical requirement of responsibility. The automated inventory, with all of its power, is also a fragile instrument, easily damaged and capable of doing damage by mismanagement. It rides a tricky balance between needs and resources: it is usually expensive and must be cost-effective to survive. It would be irresponsible to manage an automated inventory in ignorance of how it works and of how to develop its potential.

Gaining the required knowledge is not a trivial exercise, but neither is it forbidding. The computer has fewer moves in its repertoire than chessmen have, and the factors in controlling the moves are less complex. Given the need, any reasonable person can learn enough, without becoming a computer programmer. It's a matter of responsibility.

*DEFINITIONS

ADP terminology is not well controlled. Misunderstandings are often the result of minor variations in definition. The following terms, used in this issue, are defined according to their usage in the NPS ADP Project.

Data element. The smallest unit of meaning within a record, also known as a "field" or "data category." Some data elements in the record of an historic site might include the site name, a UTM

OBJECTS AND THE NATIONAL REGISTER

by W. Ray Luce
Historian, National Register

The National Historic Preservation Act of 1966 lists five types of resources eligible for listing in the National Register: districts, sites, buildings, structures, and objects. Objects have been the most troublesome of the five categories, in that they are different enough from the other categories to raise questions about what objects qualify for National Register listing, and how the subsequently developed National Register criteria apply to them.

Intent of Congress

Theoretically, thousands of objects significant in American history, including large museum collections, might be eligible for the Register. It is clear, however, that Congress did not intend to create a system like Japan's, in which the National Register would become a complete list of the Nation's cultural resources, including museum objects and manuscripts. The introduction to the National Historic Preservation Act of 1966 and the committee report, which preceded the act (published as *With Heritage So Rich*), indicate that Congress was primarily concerned with buildings and sites. In fact, the committee's recommendations for an enlarged National Register included only structures and sites.

The intent of Congress is further indicated by its continued support for earlier museum programs with no attempt to coordinate them with the National Register. Most museum objects can be easily moved if threatened and so do not need the protection provided by National Register listing. Objects, therefore, were included in properties eligible for the National Register by the 1966 act because they had been part of the Antiquities Act of 1906 and the Historic Sites Act of 1935 rather than to fundamentally change the nature of the Nation's preservation effort by establishing a comprehensive cultural list including museum objects. The National Register criteria, developed shortly after the 1966 act, provide additional evidence of the bill's intent. Most museum objects do not possess the "integrity of location, . . . setting, . . . feeling, and association" required by those criteria.

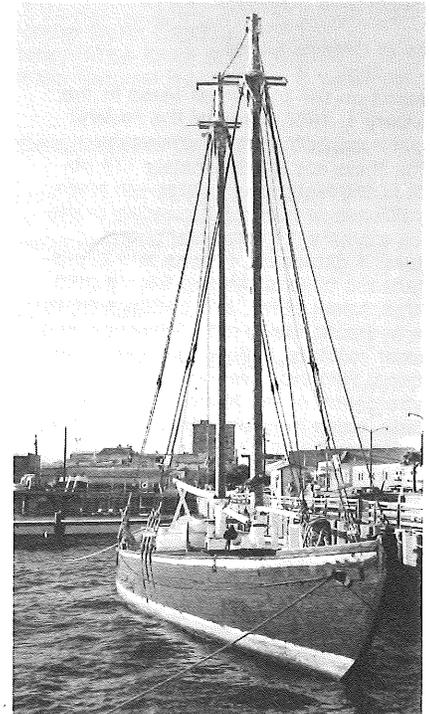
reference, or a county code.

Hardware. Computer equipment.

Software. Computer programs, which direct the computer's manipulations of data.

Record. The collection of data elements pertaining to an entity, here to an historic site. Within the computer, depending on the programming system, parts of a site's record may be physically stored in dispersed locations, but the record may generally be treated as though all its data elements were stored contiguously.

Photo: Historic Pensacola Preservation Board



Buccaneer (schooner), Pensacola, FL

Integrity of Location

The required "integrity of location, . . . setting, . . . feeling, and association" creates problems for many eligible objects including ships and locomotives, which are by nature movable. The integrity of location has been interpreted to mean that movable objects must be located in a suitable environment, not necessarily in a particular location. Thus, ships should be located in water and locomotives on tracks. The criteria does not require an object to remain stationary. It can travel regularly, like the *Delta Queen* steamboat on the Ohio and Mississippi rivers, or San Francisco's cable cars, or it may travel occasionally for special events. A ship can even leave United States coastal waters without endangering its National Register listing as long as the ship's home port remains in the United States. A ship or locomotive should be nominated by the state where the ships' home port or the locomotive's stationary terminal is located. If the home

port or terminal is later changed to another state, the object remains on the National Register and the location will be changed upon notification from the State Historic Preservation Officer.

Not all objects like ships and locomotives are eligible for listing in the National Register even though they possess integrity of location. Such objects must also possess significance in American history. That significance can be derived from a variety of associative relations or structural features and would not necessarily exclude a foreign battleship, now located in the United States, which had been significant in United States history. It would, however, exclude ships or trains with no significance in American history that have been brought to this country as part of a museum or a collection.

Type of Objects Listed

Based on the properties listed in the February 1, 1977, issue of the *Federal Register* (current through December 1976), there are approximately 119 objects in the National Register—45 ships, 17 railroads or trains, 15 boundary or distance markers, 11 monuments and statues, 4 carousels, 4 rocks, and 23 miscellaneous objects ranging from a gold dredge, totem poles, and cotton presses to a hydraulic ram, a radio telescope, and nuclear reactors. Before passage of the National Historic Preservation Act and promulgation of the National Register criteria, some museum objects, including

the entire Army Medical Museum collection, were made National Historic Landmarks and were thus automatically listed in the National Register. Since formulation of the National Register criteria, however, the requirement for integrity of location has eliminated most museum objects.

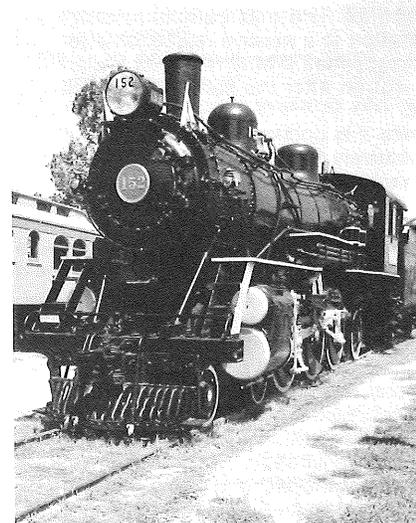
Two objects in the miscellaneous category, the Lotta Crabtree Fountain and the Southeast Water Trough, were parts of early municipal water distribution systems. The Dungcas Beach Defense Guns and the Piti Coastal Defense Guns in Guam are World War II coastal defense guns that retain locational integrity. Two art objects that maintain integrity of location and association are the Alaska Totems and the Reredos of Our Lady of Light. The reredos is a National Historic Landmark that would probably not be accepted separately for the National Register today. Under the Historic Sites Act of 1935, the reredos was judged to be nationally significant while the church was not; therefore, the reredos was listed individually. The enlargement of the National Register under the National Historic Preservation Act to include properties of state and local significance eliminated the need to list only parts of a building or decorative elements of it which are of national significance. The reredos illustrates another common problem. What should be nominated when an object, a decorative element, or a mural is the most significant part of a building? Such objects or elements would not now be accepted individually for the

Photo: Contra Costa Co.

National Register but should be prominently mentioned in a nomination for the entire building.

The National Register has great potential for helping to preserve a wide variety of significant objects ranging from carousels to stationary steam engines in their environment. Integrity of location and setting is especially important in determining what objects qualify for the Register and what objects can benefit by the protection that National Register listing gives to them and their environment.

Photo: William Clark



L&N Steam Locomotive No. 152, Louisville, KY



Hershell-Sillman Merry-Go-Round, Berkeley, CA

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