THE HISTORIC SITES SURVEY
AND
NATIONAL HISTORIC LANDMARKS PROGRAM

A HISTORY

by

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History Division
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PREFACE

Anniversaries often provide opportunities--excuses, some might say--for historians to search out and record the origins and evolution of long-established institutions and programs. The 50th anniversary of the 1935 Historic Sites Act, one of our landmark preservation laws, could hardly go unrecognized. How better to celebrate than by examining one of its enduring legacies?

The National Survey of Historic Sites and Buildings, commonly shortened to Historic Sites Survey, is the principal means by which the United States government, through the National Park Service, has identified properties of national historical significance. The name currently denoting this survey activity, the National Historic Landmarks Program, reflects the designation awarded over the past quarter-century to most places found nationally significant. Legally authorized by the Historic Sites Act, the identification and recognition of such properties has fostered public awareness of American history and concern for preserving its tangible evidences.

The program has had other purposes and consequences, less lofty but no less real. It has served to qualify and disqualify sites for the National Park System, to appease politicians and interest groups, and occasionally to offend citizens unsympathetic to its actions. Although staffed by conscientious professionals, like any government program it has not been immune to extraneous influences. Such influences are manifest in landmarks illustrative less of American history than of the forces

behind their designation.

In marking the golden anniversary with this history, I have tried to avoid the celebratory treatment often accorded on such occasions. A eulogy might serve public relations, but it would not serve public understanding. Nor would it serve those in a position to advance the landmarks program through a better appreciation of its weaknesses as well as its strengths. What follows, then, attempts to portray the reality of the program--both its shortcomings and its successes.

As an observer of the landmarks program over 15 years, I have necessarily formed opinions on it. In fairness to the reader--and in hopes that others may share and act upon them--I shall disclose my biases here. I believe that national historic landmark designation should be held precious; that a landmark should say something important about and to the nation as a whole; that it should be something worth going out of one's way to view or visit; that it should continue to meet the criteria of national significance; and that if it does not--or never did--it should be stripped of its designation. The true value of an honor is revealed not by its most qualified recipient but by its least. If landmark status is to signify all it should to the American people, its coin must not be debased.

I should like to see the program's performance measured less by the quantity of landmarks designated than by their quality. To maintain and enhance the integrity of the program, its staff should get as much credit for the refusal or casting out of an unworthy site as for the admission of a worthy one. There are obstacles--legal, political, public, bureaucratic--to such action. Given sufficient incentive, they can be overcome.

Even were he not my boss, I would give the landmarks program a favorable prognosis under its current overseer, Chief Historian Edwin C. Bearss of the National Park Service, who assigned this anniversary history and contributed much from personal knowledge and insight. Historians Benjamin Levy, in immediate charge of the program, and James H. Charleton shared their extensive familiarity with its progress since the late 1960s. Associate Director Jerry L. Rogers and his predecessor, Ernest Allen Connally--senior statesmen in Park Service preservation--offered their views on its past and present roles in the preservation movement. Verne E. Chatelain, Herbert E. Kahler, and Robert M. Utley, former chief historians of the Service, recalled key events and trends spanning more than 40 years. Others in and outside the Service provided valuable information, among them F. Ross Holland, Jr., Richard H. Howland, Merrill J. Mattes, Fred L. Rath, Jr., Horace J. Sheely, Jr., Charles W. Snell, and Jean E. Travers. As usual, Gay Mackintosh donated her expert editorial assistance. I thank them all.

Now to celebrate.

Barry Mackintosh
September 1984

THE PREWAR YEARS

Setting the Framework

The United States, traditionally reliant on private initiative in most areas of social concern, was late among Western nations to assume governmental responsibility for recognizing and preserving historic or cultural properties. Congress took a step in this direction in 1889, when it authorized the President to reserve a tract in Arizona containing the prehistoric Casa Grande ruin. Spurred by powerful veterans' organizations, it began during the next decade to establish parks under War Department administration at major battlefields, and it went on to provide care for battle sites of earlier American conflicts. Its first general preservation enactment was the Antiquities Act of 1906, which authorized the President to proclaim and reserve as national monuments "historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest." Of considerable importance and effect, this authority extended only to properties already held by or donated to the government. In keeping with the interests of its promoters, most of the early national monuments proclaimed for cultural features encompassed prehistoric archeological remains in the Southwest; they were joined by an array of obsolete fortifications on military reservations beginning in the 1920s.[1]

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[1] 25 Stat. 961; 34 Stat. 225; Ronald F. Lee, The Origin and Evolution of the National Military Park Idea (Washington: National Park Service, 1973); Ronald F. Lee, The Antiquities Act of 1906 (Washington: National Park Service, 1970).

The early preservation movement was centered in the private sector. Although preservationists led New York State to acquire George Washington's Newburgh headquarters in 1850, the movement was most notably exemplified by creation of the private Mount Vernon Ladies' Association in 1856 to save Washington's home. By the mid-1920s there were historic house museums throughout the country, with the heaviest concentration among colonial dwellings in the Northeast. Typically they were operated by historical and genealogical societies for their antiquarian and educational values and for the inculcation of patriotism. The trend reached its apotheosis with the Colonial Williamsburg restoration begun by John D. Rockefeller, Jr., in 1926. This largest and most dramatic venture of its kind inspired new and increased efforts elsewhere, under public and private auspices, to advance historic preservation for patriotic instruction and tourism promotion.[2] Few undertakings could approach the levels of financial backing and public support enjoyed by Mount Vernon and Williamsburg, and not all prospered. With the coming of the New Deal era and its wholesale enlargement of the public sector's role in society, it was predictable that many would turn to the government for help in caring for historic properties.

The National Park Service was eager to respond. The 1916 legislation creating the Service as a bureau of the Interior Department included among its purposes "to conserve the...historic objects" in the parks and monuments then and thereafter assigned to it. Director Stephen T. Mather and his assistant and successor, Horace M. Albright, began soon afterward to

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[2]Charles B. Hosmer, Jr., Presence of the Past (New York: G. P. Putnam's Sons, 1965), pp. 8-9; Charles B. Hosmer, Jr., Preservation Comes of Age (Charlottesville: University Press of Virginia, 1981), 1: 1,3.

lobby for the historic military sites and prehistoric resources that remained and continued to be reserved as national military parks and monuments under the Agriculture and War departments. Especially in the case of the battlefields and forts, they were not unmotivated by a desire to expand their young bureau's political base and public constituency in the more populous East.[3] For some time their efforts were unrewarded: through the 1920s the Service remained wholly Western in its cultural holdings and nearly so in its natural areas.

In 1930 Albright secured two new historical parks in Virginia, George Washington Birthplace National Monument and Colonial National Monument, the latter embracing Jamestown and Yorktown. The following year the Service hired its first park historians (at Colonial) and a chief historian in Washington, Verne E. Chatelain. Morristown National Historical Park, New Jersey, like Yorktown a Revolutionary War area that might logically have joined the War Department's park system, was established under Service control in 1933. Later that year, aided by a fortuitous personal conversation with President Franklin D. Roosevelt, Albright finally obtained by executive order the long-sought parks and monuments from the other federal agencies as well as the major memorials and parklands of the nation's capital.[4] The Service, previously most visible as a natural wilderness manager, was now firmly in command of federal historic preservation activity as well.

This administrative unification of the government's historic sites

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[3]39 Stat. 535; Horace M. Albright, Origins of National Park Service Administration of Historic Sites (Philadelphia: Eastern National Park and Monument Association, 1971).

[4]Albright, Origins of National Park Service Administration; Executive Orders 6166 and 6628, June 10 and July 28, 1933, 5 U.S.C. §124-132.

was important to the development of a comprehensive, coherent federal preservation program. Two other significant contributors were the Civilian Conservation Corps and the Historic American Buildings Survey, emergency relief measures also initiated during the first year of the Roosevelt administration. The National Park Service oversaw the work of the CCC in preserving and developing state historic sites along with its own. HABS, a Park Service program funded by the Civil Works Administration, hired unemployed architects, photographers, and draftsmen to record significant examples of American architecture. Both programs cut across federal-state lines, involving the Service with historic properties and preservation functions regardless of jurisdiction.[5] Yet their activities were administrative improvisations, lacking specific legal authority. To insure that it could continue its broad-based involvement, the Service needed the sanction of law.

The result was the Historic Sites Act of August 21, 1935, articulating in its preamble "a national policy to preserve for public use historic sites, buildings and objects of national significance for the inspiration and benefit of the people of the United States." Drafted in the Interior Department that January, the bill was sponsored in Congress by Sen. Harry F. Byrd, Sr., of Virginia and Rep. Maury Maverick of Texas. Secretary of the Interior Harold L. Ickes summarized its purpose in testifying before the House Public Lands Committee in April: "to lay a broad legal foundation for a national program of preservation and rehabilitation of historic sites and to enable the Secretary of the Interior to carry on in a planned,

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[5]Harlan D. Unrau and G. Frank Williss, Administrative History: Expansion of the National Park Service in the 1930s (Denver: National Park Service, 1983), pp. 172-81.

rational and vigorous manner, an important function which, because of lack of legal authorization, he has hitherto had to exercise in a rather weak and haphazard fashion."[6]

Ickes went on to advocate "a thorough survey of all historic sites in the country...on the basis of their national and local significance" as an essential first step: "This would make possible the building up of a unified and integrated system of national historical parks and monuments which, taken in their entirety, would present to the American people graphic illustrations of the Nation's history." He compared this survey to that being undertaken by the President's National Resources Board for natural resources. "[A]t the same time," he said, "such a survey would make it possible to call to the attention of the States, municipalities, and local historical organizations, the presence of historical sites in their particular regions which the National Government cannot preserve, but which need attention and rehabilitation."[7]

The committee amended the administration bill to limit the Secretary's ability to acquire or assist historic properties without prior congressional appropriations. But its survey provision met no opposition and was enacted without change. It directed the Secretary of the Interior, through the National Park Service, to "[m]ake a survey of historic and archaeologic sites, buildings, and objects for the purpose of determining

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[6]P.L. 292, 74th Congress, 49 Stat. 666; S. 2073, 74th Congress, Feb. 28, 1935; H.R. 6670, 74th Congress, Mar. 13, 1935; U.S. Congress, House, Committee on the Public Lands, Preservation of Historic American Sites, Buildings, Objects, and Antiquities of National Significance, Hearings on H.R. 6670 and H.R. 6734, 74th Congress, 1st Session, Apr. 1, 2, and 5, 1935, p. 4 (hereinafter cited as Hearings).
See appendix for Historic Sites Act.

[7]Hearings, p. 5

which possess exceptional value as commemorating or illustrating the history of the United States" (Section 2[b]).

The thrust of the Historic Sites Act, evident from its language and legislative history, was to expand and develop the National Park System. To be sure, the act authorized continuation of the Historic American Buildings Survey (Section 2[a]) and cooperative agreements with state and local governments, organizations, and individuals for the care of non-federal historic properties not specified as nationally significant (Section 2[e]). But the framers of the act envisioned that most of those places found from the survey to possess national significance (or "exceptional value") would be acquired by the Service.

Procedures for implementing the act approved by the Secretary in February 1936 reiterated this objective: "The National Park Service, through its Branch of Historic Sites and Buildings, shall...study and investigate historic and archeologic sites and buildings throughout the United States, and list, describe, tabulate, classify and evaluate such sites for the purpose of developing a comprehensive long-term plan for their acquisition, preservation and use" (emphasis added). Properties not acquired might be designated national historic sites under cooperative agreements with their owners; such agreements would be required to dictate that no changes be made, no monuments or signs erected, and no historical information disseminated without the consent of the Park Service director. "In instances where doubt exists as to national historical significance of a site, or other factors render acquisition undesirable, a cooperative agreement may be resorted to, as authorized by Section 2(e) of the Historic Sites Act," NPS Director Arno B. Cammerer declared in another policy statement that December. "Thus, the functions

of assistance in preservation, educational service, etc. will be performed without assumption of permanent responsibility for upkeep."[8] This outreach approach for unavailable or marginal properties was clearly less favored; the Park Service preferred more parks.

The influx of some 40 historical parks in 1933 improved the geographical balance of the National Park System, but it was still seriously imbalanced in its coverage of historical themes or subject matter. Prehistoric and military sites--battlefields and forts--now composed more than two-thirds of its cultural properties; other aspects of American history were all but ignored. The historic sites survey was viewed as a means not only of expanding the System but of improving its representation of the nation's past.

The first recorded statement of a thematic approach to historic site selection appears in a 1929 report of the Committee on the Study of Educational Problems in the National Parks, appointed by Secretary of the Interior Roy O. West. The report was prepared by Clark Wissler, a prominent anthropologist with the American Museum of Natural History. "In view of the importance and the great opportunity for appreciation of the nature and meaning of history as represented in our National Parks and Monuments, it is recommended that the National Parks and Monuments containing, primarily, archeological and historical materials should be

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[8]Letter, Acting Secretary Charles West to Director, NPS, Feb. 28, 1936, Old Survey Procedures file, History Division, NPS; Arno B. Cammerer, "A Statement of Policy to Guide the Service in the Matter of the Historic Sites and Building Survey," Dec. 8, 1936, ibid.

Section 2(e) of the Historic Sites Act was later reinterpreted to authorize cooperative agreements only for properties of national significance. See John D. McDermott, "Breath of Life: An Outline of the Development of a National Policy for Historic Preservation," typescript for National Park Service, 1966, p. 32.

selected to serve as indices of periods in the historical sequence of human life in America...," it stated. "Further, a selection should be made of a number of existing monuments which in their totality may, as points of reference, define the general outline of man's career on this continent."[9]

The desirability of thematic balance was further advocated in a 1932 memorandum from Verne Chatelain and Yellowstone Superintendent Roger W. Toll to Director Albright, who had asked them to consider policies for historic sites and programs in anticipation of acquiring the War Department areas:

> [A] system of acquiring historic sites should include all types of areas that are historically important in our national development.... An examination of the list of areas that have been set aside as national military parks, battlefield sites and national monuments administered by the War Department, indicates that the selection has not been the result of a plan or policy determined in advance, but rather the acceptance of areas that have been advocated from time to time by various proponents. Some of these areas are undoubtedly of the highest importance, but others may not be. Certainly the list does not represent all of the most important shrines of American history, even in the field of military endeavor. The pressure that has been brought in the past to bear on the War Department in the establishment of these national military areas will be transferred to the National Park Service along with the sites themselves.
>
> The setting up of standards for national historical sites and the listing and classification of areas pertinent to the development of the Nation seems to be of utmost importance.... [I]t is unsound, uneconomical and detrimental to a historical system and policy to study each individual area when presented and without reference to the entire scheme of things.[10]

In a memorandum of April 1933, Chatelain discussed various possible strategies for historic site surveying and classification. The Service,

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[9]Reports with Recommendations from the Committee on Study of Educational Problems in National Parks, Jan. 9, 1929, and Nov. 27, 1929 (Washington: Department of the Interior, n.d.), p. 24.

[10]Memorandum dated Dec. 12, 1932, quoted in Unrau and Williss, Administrative History, pp. 164-65.

he suggested, could focus on properties of particular types, such as presidential sites, or it could select a certain number per state. Rather than taking a political, geographic, or antiquarian approach, however, he would choose sites that fit like puzzle pieces in the large pattern of United States history. "The sum total of the sites which we select should make it possible for us to tell a more or less complete story of American history...," he wrote. "It is going to be impractical for the Federal Government to take a lot of unrelated historical sites--no matter how significant any one of them might seem at the moment. What I feel we must do is to select bases from which the underlying philosophy can be developed, and expanded to the best advantage."[11]

In line with this thinking, Chatelain developed the first statement of general criteria for historical additions to the National Park System. Candidate areas should possess the quality of "uniqueness," which he defined as present

> (a) In such sites as are naturally the points or bases from which the broad aspects of prehistoric and historic American life can best be presented, and from which the student of history of the United States can sketch the large patterns of the American story; which areas are significant because of their relationship to other areas, each contributing its part of the complete story of American history;
>
> (b) In such sites as are associated with the life of some great American, and which may not necessarily have any outstanding qualities other than that association; and
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> (c) In such sites as are associated with some sudden or dramatic incident in American history, which though possessing no great intrinsic qualities are unique, and are symbolic of some great idea or ideal.[12]

Among its other provisions, the Historic Sites Act established the

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[11]Memorandum to Arthur E. Demaray, Apr. 21, 1933, Old Policy File, History Division.

[12]Letter, Arno B. Cammerer to Gist Blair, Dec. 18, 1933, drafted by Chatelain, quoted in McDermott, "Breath of Life," p. 32.

Secretary of the Interior's Advisory Board on National Parks, Historic Sites, Buildings, and Monuments, to include not more than 11 members "competent in the fields of history, archaeology, architecture, and human geography." At the board's first meeting in February 1936, Chatelain outlined his forecast for the historic sites program. Of the properties that would be identified, he envisioned the largest number being cared for by others, a lesser number becoming subject to federal cooperation with their owners, and the fewest assigned exclusively to Service custody. The board declared its preference for classifying sites into national, state, and local categories, hoping these would not carry invidious connotations of superiority-inferiority.[13]

The membership, which included Clark Wissler, endorsed the concept of selecting sites from which American history could be narrated. At their second meeting in May, Chatelain presented and the board adopted a general statement on survey policy and procedure:

> The general criterion in selecting areas administered by the Department of the Interior through the National Park Service whether natural or historic, is that they shall be outstanding examples in their respective classes....
>
> It is desirable in ascertaining the standards for selecting historic sites, to outline briefly the stages of American progress and then indicate lists of the possible sites illustrative of each stage. In the study of these lists it is expected that attention will be centered on particular sites which, because of their deep historic value, as well as because of the fact that they possess important historic remains and are generally available, may be said to be the best examples in their respective classes....
>
> With respect to historic and archeologic sites other than those selected for attention by the Federal Government, the function of the National Park Service should be to encourage state, local, semi-public and private agencies to engage in protective and interpretive activities. This work should always be closely associated with the program of National Historic sites administered by the Federal

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[13]Minutes of the 1st Meeting, Advisory Board on National Parks, Historic Sites, Buildings, and Monuments, Feb. 13-14, 1936, Cooperative Activities Division, NPS.

Government.[14]

Chatelain simultaneously presented a list of 12 prehistoric culture groups and 23 historical themes for the grouping and comparative evaluation of sites. The culture groups were geographical; the historical themes were divided among three chronological periods and bore such labels as English Exploration and Colonization, The Advance of the Frontier, Architecture and Literature, and Industrial Development. With the adoption of criteria, later refined to more comprehensively define national significance, and a thematic structure, also modified over the years, the basic framework for the historic sites survey was set.[15]

The thematic approach to site selection championed by Chatelain reflected a striving for professional respectability in the field of historic preservation. Then as later, the field was depreciated among academic historians as the province of antiquarians interested in old things for their own sake. To overcome this stigma, Chatelain and his colleagues sought to portray historic sites as media or means for communicating broad historical themes in the same manner as documents served academics.[16]

For a variety of reasons, Service-affiliated sites failed to attain the hoped-for standing in scholarship and education. That the effort was made, however, elevated their treatment and presentation above the

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[14]Minutes, 2d Advisory Board Meeting, May 7-9, 1936.

[15]Ibid.; theme structure adopted in March 1937 (Minutes, 4th Meeting). See appendix for theme structure in full.

[16]For statements of this motivation and thinking see Chatelain, "A National Policy for Historic Sites and Monuments," typescript c. 1934, and Carleton C. Qualey, "A National Parks Historical-Educational Program," typescript Aug. 21, 1933, Historic Sites Survey file, History Division.

prevailing level and established the Service as a model in the field.

Conduct of the Survey

As with the Historic American Buildings Survey (but with less structure), historic sites survey activity by the National Park Service preceded the legislation that explicitly sanctioned it. Verne Chatelain and B. Floyd Flickinger, a park historian at Colonial National Monument, were undertaking a limited survey in the spring of 1933. "Although it is not yet complete enough has been done to point the way to certain conclusions," Chatelain wrote a superior; unfortunately, the purpose and conclusions were not stated. A year later, a site survey was underway to provide background data for the bill that became the Historic Sites Act. Most of the early survey activity was unsystematic, being conducted by Chatelain and field historians such as Flickinger and Ronald F. Lee at Shiloh National Military Park in response to public and political pressures for government action in behalf of particular properties.[17]

In anticipation of passage of the historic sites legislation, a Branch of Historic Sites and Buildings was established in the Service's Washington office on July 1, 1935. Verne Chatelain was acting assistant director in charge of the branch until his resignation in September 1936; he was succeeded in the "acting" capacity by Branch Spalding, superintendent of Fredericksburg National Military Park. Ronald Lee was appointed assistant director in May 1938 and continued in immediate charge of the Service's historical function until 1951.

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[17]Memorandum, Chatelain to Arthur E. Demaray, Apr. 21, 1933, Old Policy File, History Division; Unrau and Williss, Administrative History, p. 185; telephone interview with Chatelain, Nov. 30, 1983.

Survey activity under the Historic Sites Act was formally inaugurated in July 1936, the beginning of the next fiscal year. The program was then denominated The National Survey of Historic Sites and Buildings, commonly shortened to Historic Sites Survey. The Washington headquarters of the Branch of Historic Sites and Buildings had among its duties "the organization and direction of the Historic Sites Survey and assignment of priority in lists of proposed areas for field investigation." Field investigation was to be carried out by historians assigned to the branch but stationed in the Service's four regional offices and historical parks.[18]

Writing to Director Arno B. Cammerer that October, Branch Spalding called the Historic Sites Survey "probably the most important single project now before the Branch of Historic Sites and Buildings, and in its ultimate effects one of the most significant projects of the National Park Service." The survey was to cover the nation, treat each of the principal themes of American history and prehistory, and encompass a well-rounded variety of sites. Spalding outlined four steps to be followed: preparing an inventory of important properties, with cards to be filled out on each; conducting field studies and research on the most promising; classifying areas according to national and non-national significance, assisted by the Secretary's Advisory Board; and developing a national preservation plan, in cooperation with other agencies. "National planning

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[18]Chatelain, "Organization and Functions, Branch of Historic Sites and Buildings," Historical Memorandum No. 1, July 30, 1936, quoted in Unrau and Williss, Administrative History, p. 198.

Francis S. Ronalds and Alvin P. Stauffer served successively as Historic Sites Survey coordinator in Washington in the prewar years. The regional historians responsible for survey activities in 1937 were Rob Roy MacGregor, Region I (Richmond); Philip Aushampaugh, Region II (Omaha); Leroy Hagerty, Region III (Oklahoma City); and Charles Hicks, Region IV (San Francisco).

is an important function of the present government and is now being applied to the main problems of conservation by the National Resources Board and the agencies with which that Board cooperates," he declared. "In no field is national planning more necessary or promising than in the field of conserving historic sites."[19]

The classification of areas was seen as matter of the greatest sensitivity. It was feared that owners of properties found nationally significant would become either unduly hopeful or unduly fearful that the government would seek to acquire them. Tendencies to commercialism and increased asking prices were also foreseen. The Advisory Board therefore recommended that the list of such properties be kept confidential, resolving that "no announcement of sites so selected shall be made until a substantial number of sites of comparable importance has been selected" and until effective control of the sites by public or quasi-public bodies had been secured. Notwithstanding the latter prescription, the board added, "Declaration that a site or building is of national significance does not of itself imply any desire either to deprive the present owners of it, or any commitment on the part of the government to recommend acquisition of title."[20]

Survey procedures prepared by the Branch of Historic Sites and Buildings and circulated to the field historians reflected the concern for secrecy. "Recommendations on priority in national importance to be submitted in confidential letter and never indicated on card and never made part of records except in Washington Office," Spalding ordered with Cammerer's approval. "All recommendations on priority ratings to be ab-

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[19]Memorandum, Spalding to Director, Oct. 12, 1936, approved by Cammerer Dec. 8, 1936, Old Survey Procedures file, History Division.

[20]Minutes, 2d Advisory Board Meeting, May 7-9, 1936.

solutely confidential and violation of this rule to be considered grounds for severe reprimand and perhaps taking employee off the survey.... The results of the classification must be kept absolutely confidential. There will be only one list of classified sites, and that one will be kept under lock and key in the records of the National Park Service. Duplicate copies of the inventory cards and reports may be kept in the field offices, but the classified list will be known only to those intimately connected with the survey in the Washington Office."[21]

Spalding issued further instructions to the survey historians in January 1937. In planning their research and field work they were to consider historical significance, architectural interest, danger of destruction, physical condition, and difficulties likely to be encountered in preservation and development for public use. No structures postdating 1860 were then to be included for architectural reasons, "although historical considerations may in some cases justify their inclusion." Thematically related sites and structures were to be studied together. A specific course of action was outlined:

> Each field man assigned to a certain area will first contact individuals he believes best qualified to suggest sites and structures to be inventoried, including architects and historians. From such sources and from lists provided from this Office and from research, he will make out a list of sites. He will then make a general reconnaissance survey of his territory and submit such cards as he has filled in to the Washington Office, accompanied by a letter or memorandum reviewing the survey problem in his area and recommending a general program. Both the main groups or types of sites to be studied, as well as specific sites suggested for intensive investigation, should be included in the recommendations. These will be carefully reviewed in the Washington Office by architects and historians and the program as a whole approved with such additions or modifications as may be desirable or necessary....
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> It should always be kept in mind that the purpose of this

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[21]Memorandum, Spalding to Director, Oct. 12, 1936, Old Survey Procedures file.

> inventory is simply to secure information. No statements should be made regarding a possible general preservation program by the Federal Government....[22]

The Service did not await input from the field program before obtaining Advisory Board action on certain properties already proposed for the National Park System. At its first meeting in February 1936 the board found nationally significant the proposed Homestead National Monument, Nebraska; Fort Frederica, Georgia; Richmond Battlefield, Virginia; Harpers Ferry, West Virginia; Derby Wharf, Massachusetts; and three sites suggested for addition to Colonial National Monument. That May the board approved 12 more properties as possessing national significance: Old Main Building, Knox College, Illinois; Mackinac Island, Michigan; Fort Bridger, Wyoming; The Alamo, Texas; Site of the Treaty of Greenville, Ohio; Bentonville Battlefield, North Carolina; Mulberry Grove, Georgia; Los Adais, Louisiana; San Jose Mission, Texas; Hopewell Iron Furnace, Pennsylvania; Fort Raleigh, North Carolina; and Grand Portage, Minnesota. Only the last four of these subsequently joined the Park System. The Secretary of the Interior took no action to approve or confirm the board's findings until after its fifteenth meeting in 1941; the following year Acting Secretary Abe Fortas retroactively approved all national significance determinations made before that meeting.[23]

Inevitably, there were public and political pressures on the Service to acquire or assist properties of questionable value in its expanded historic sites program. Writing to Cammerer in October 1936, Spalding stressed the need to adhere to national significance as the criterion

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[22]Memorandum, Spalding to Field Historians, Jan. 26, 1937, ibid.

[23]List in Minutes, 4th Advisory Board Meeting, Mar. 25-26, 1937; Minutes, 17th Advisory Board Meeting, Dec. 7, 1944.

for acquisition. When pushed to take lesser quality sites, he said, "we should resort to a cooperative arrangement whereby the Service can assist in the preservation, educational functions, etc. but not assume permanent responsibility for the upkeep of the site.... I believe the adoption of this policy will not involve any risk of not acquiring an adequate system of sites. Our problem now is not how to acquire, but how not to acquire undesirable sites."[24]

In a memorandum drafted by Spalding, Acting Director Arthur E. Demaray advised survey historians in April 1937 that sites brought to their attention "by individuals or organizations influenced by other than purely academic interests" should not be included in their lists of recommended properties "unless they would be incorporated without such representation." At its fourth meeting that March, the Advisory Board had resolved that the Branch of Historic Sites and Buildings "should first devote its available personnel to preparation of a comprehensive tentative list of sites of major importance, and that so far as possible, this receive priority over any more detailed studies, especially of projects presented by outside bodies." The resolution was doubtless influenced by the case of the Dr. John McLoughlin House in Oregon City, Oregon. Rep. James W. Mott, a member of the House Public Lands Committee whose district included the property, had introduced legislation that would authorize $25,000 for its restoration and maintenance. The house had lost integrity by being moved from its original site, however, causing the board to withhold a finding of national significance and support for federal funding. Representative Mott appeared at the next meeting of the board's committee on

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[24]Memorandum, Spalding to Director, Oct. 17, 1936, Old Policy File.

historical areas, "gave a rather detailed historical account of the influence and importance of McLoughlin," and made clear that Oregon desired national recognition for the property. The board reversed itself, and the Interior Department designated the house a national historic site in 1941. As with the few other national historic sites outside the National Park System, the relationship between the Service and its owner was and is governed by a cooperative agreement of the type suggested by Spalding.[25]

Despite the board's resolution on survey priorities and Demaray's instruction, requests for and action on "special studies" were more typical than exceptional. "[W]e couldn't survey fast enough to keep up with the proposals that poured in from the Hill," Ronald Lee later recalled. "And what happened was that the staff employed to make an objective survey constantly found themselves rushing out to put out fires lighted by historical societies or other groups that wanted to get something into the System and unload the maintenance and care on the Federal Government."[26] As a public agency dependent on congressional appropriations, the Service could seldom say no to influential legislators seeking favors for influential constituents.

The time spent on such requests hampered the overall progress of the survey, especially as less rather than more money was provided. A paper prepared by the Branch of Historic Sites in the latter part of 1938 out-

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[25]Memorandum, Demaray to Field Historians, Apr. 26, 1937, Old Survey Procedures file; H.R. 11536, 74th Congress, Feb. 28, 1936; Minutes, 4th Advisory Board Meeting, Mar. 25-26, 1937; Minutes, Committee on Historical Areas, Advisory Board, June 25-26, 1937; Minutes, 5th Advisory Board Meeting, Oct. 28-29, 1937; designation order by Acting Assistant Secretary W. C. Mendenhall, June 27, 1941.

[26]Transcribed interview by Charles B. Hosmer, Jr., June 29, 1970, p. 20, copy at Harpers Ferry Center, NPS.

lined the problems then faced:

> Due to conditions over which the National Park Service has no control, especially the widespread interest shown in the historic sites legislation, the numerous requests for consideration of individual sites and the sharply reduced funds available for prosecution of the work, an increasingly difficult situation is developing with respect to the progress of the Historic Sites Survey.... If the historic sites survey is to be executed on the basis of the present plan, the greater portion of the work still lies ahead. This is in the face of reduced funds and a request from the House appropriations committee for an estimate on the probable date of termination for the work.
>
> In considering the Historic Sites Survey item the House Committee asked many questions which to some extent revealed the attitude of Congress towards the progress of our work. Perhaps the most significant and persistent questioning had to do with the length of time the survey will take. At the request of the Committee the Service submitted an estimate of the time required, stating that the work could be completed in eight years with a $24,000 annual appropriation or in less time with a larger appropriation. The House Committee recommended $12,000 and that is available for the work this year [fiscal 1939]. Unless the work of historic sites conservation is more strongly supported by appropriations, it will be difficult or impossible for the National Park Service to carry on the programs recommended by the Advisory Board.[27]

In fiscal 1940 Congress provided $24,000, reduced to $20,000 in each of the two succeeding years. The branch estimated the survey to be 30 percent complete by July 1, 1940, and "expected to continue for several years more." At its October 1941 meeting the Advisory Board observed that the work had been carried on "with diligence and considerable success by Mr. Ronald F. Lee and his under-staffed office." By that time reports or preliminary studies had been prepared on seventeenth and eighteenth century French and Spanish sites, Dutch and Swedish colonial sites, seventeenth century English sites, Western expansion to 1830, Western expansion from 1830 to 1900, early man in North America, prehistoric sedentary agriculture groups, and historic sedentary agriculture groups. Work had begun on eighteenth century British settlement and the

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[27]Untitled paper in Historic Sites Survey file.

Revolutionary War.[28]

As of 1943 some 560 historic sites representing 15 themes had been inventoried. Two hundred twenty-nine of them were found to be nationally significant, 18 of which had become national historic sites by law or secretarial designation. The archeological inventory, done by a smaller staff in cooperation with seven universities, had identified 334 prehistoric or aboriginal sites representing five themes; 31 of these were found nationally significant.[29]

To avoid imbalance in certain themes, the Advisory Board recommended that a "final selection" of sites not be made until all themes were addressed. In the meantime, it suggested, the Service should build up a "preliminary map showing thereon the proposed landmarks in different colors and symbols...representing in totality an inter-related picture of national life and growth."[30]

Despite the free-spending image of the New Deal, President Roosevelt's Bureau of the Budget remained watchful for unnecessary federal expenditures. In late 1938 it became concerned that the Historic Sites Survey would stimulate undue acquisition and funding of historic properties, evidenced by fiscal 1940 budget requests for operation of the recently designated Salem Maritime and Hopewell Village national historic sites. At the Budget Bureau's behest, Roosevelt asked Secretary Ickes to explain the process of national historic site designation within his

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[28]Historic Sites Program paper, 1940, ibid.; Minutes, 15th Advisory Board Meeting, Oct. 28-30, 1941; Unrau and Williss, Administrative History, pp. 214-15.

[29]Charles W. Porter, "Statement on the Operation of the Historic Sites Act, August 21, 1935-December 1943," Historic Sites Survey file.

[30]Minutes, 15th Advisory Board Meeting, Oct. 28-30, 1941.

agency. He followed up in February 1939 with a caution: "In view of the financial situation, it is my desire that the number of historic sites to be established be kept to an absolute minimum, and that the annual operating costs of the established sites be held to the lowest possible figure consistent with proper administration." That May, after signing a national monument proclamation under the Antiquities Act authority, Roosevelt directed Ickes to submit any further national monument or historic site proposals to him through the Budget Bureau "prior to making any commitments concerning such projects."[31]

America's entry into World War II in December 1941 brought a virtual end to survey and designation activity. In March 1942 Roosevelt wrote Ickes:

> I have reluctantly approved the designation of the Gloria Dei (Old Swedes') Church, Philadelphia, Pennsylvania, as a national historic site, as recommended in Acting Secretary [Elbert K.] Burlew's letter of March 16, 1942.
>
> While I favor the preservation for public use of historic sites, buildings, and objects of national significance, and while a designation as an historic site frequently requires no Federal expenditure, it seems inappropriate, when the Nation is at war, to utilize the time of Government employees in conducting investigations looking to the designation of such sites. I believe that such employees could be assigned duties more closely related to the war effort.
>
> In view of the foregoing I suggest that for the duration of the war all efforts with respect to the designation of national historic sites be suspended, and that the time of employees engaged in this line of endeavor be directed into more productive channels.
>
> P.S. In exceptional cases, please speak to me.

The President's directive was passed to the Park Service, and Director Newton B. Drury hastened to inform the Secretary of his bureau's compliance:

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[31]Letter, Ickes to Roosevelt, Jan. 30, 1939, Historic Sites Survey file; letter, Roosevelt to Ickes, Feb. 6, 1939, ibid.; letter, Roosevelt to Ickes, May 17, 1939, ibid.

> Travel to an investigation of proposed national historic sites was greatly curtailed during 1941 in order to permit our limited historical staff to devote increased efforts to the protection and interpretation of historical areas under war conditions. Except where previous commitments caused the project to carry over, as in the case of Gloria Dei, such investigations virtually ceased after December 7. All investigations, including pending projects, will now be suspended for the duration of the war; and exceptional cases will be brought to your personal attention.[32]

Marking: The Blair House Prototype

Section 2(g) of the Historic Sites Act empowered the Secretary of the Interior to "[e]rect and maintain tablets to mark or commemorate historic or prehistoric places and events of national historical or archaeological significance." This authority was of special interest to Maj. Gist Blair, scion of the historically and socially prominent Blair family and owner of Blair House, opposite the White House on Pennsylvania Avenue. Blair, who had promoted the drafting and enactment of the legislation, wanted to memorialize his family with an official marker or plaque at the property. Through his influence with the Roosevelt administration and Advisory Board members, the Park Service was directed to study Blair House in 1937, and the board found it nationally significant that October.[33]

The following April Blair wrote Secretary Ickes to request a tablet in front of his house. Replying for Ickes, Director Cammerer told Blair that no appropriation had been made for historical markers but that he would assist if funds were donated. In December the Advisory Board asked

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[32]Letter, Roosevelt to Ickes, Mar. 28, 1942, ibid.; memorandum, Drury to Ickes, Apr. 10, 1942, ibid.

[33]Memorandum, Edna M. Colman to Verne E. Chatelain, Dec. 30, 1935, Blair House National Historic Landmark file, History Division; Minutes, 5th Advisory Board Meeting, Oct. 28-29, 1937.

the Secretary to seek appropriations for "a uniform type of historic marker" for properties found eligible under the Historic Sites Act.[34] This request was pursued and led to design of a plaque for national historic sites designated by the Secretary. Of bronze, the plaque had a bas relief eagle beneath a curved top. Thereunder appeared the heading "National Historic Site," followed by the name of the property, up to 18 lines of descriptive text, and identification of the National Park Service and Interior Department.

Blair House was not made a national historic site; it was still a private residence, and the designation signified public accessibility if not ownership. But in 1939 the Advisory Board, now counting Gist Blair among its members, informally approved the idea of a Blair House marker. The Service drafted a text and circulated it to board members for comment.[35]

The anomalous nature of Blair House and certain other properties unsuited for national historic site designation inspired a Service proposal for a "second category of historic sites" in March 1940. The proposal was outlined by Acting Director Arthur Demaray in a memorandum approved by Secretary Ickes:

> The growth of the Historic Sites program has raised a problem of which the Service has become increasingly conscious--the need for some kind of recognition for places of marked national and popular historical interest which, for various reasons, do not lend themselves to the usual type of custodianship and development....
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> It would appear reasonable to establish a second category of historic sites to take care of this problem. The grave of John Howard Payne [diplomat and composer of "Home Sweet Home"], for

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[34]Letter, Blair to Ickes, Apr. 30, 1938, Blair House NHL file; letter, Cammerer to Blair, May 6, 1938, ibid.; Minutes, 9th Advisory Board Meeting, Nov. 30-Dec. 2, 1938.

[35]Minutes, 11th Advisory Board Meeting, Nov. 7, 1939.

> example, might be designated a place of national historical interest by the Secretary of the Interior under authority of the Historic Sites Act. The Service could then cooperate with the authorities in control of Oak Hill Cemetery [Washington, D.C.] in arranging for adequate physical preservation of the interesting old commemorative stone placed there.... [A] small unobtrusive marker could be placed to record for all visitors the existence of a cooperative Federal responsibility.... The site could then be placed on a published list of such areas designated....
>
> Such a program for a secondary category of historic sites would, I believe, have wide popular appeal; it would strengthen support for and arouse interest in the historical conservation program generally; and it would provide a means for giving constructive assistance to many groups interested in sites which must at present be flatly rejected from consideration.[36]

As Ickes subscribed to the proposal, the Advisory Board was again meeting and approved the text for the Blair House plaque. Afterward Cammerer wrote Ickes:

> In view of the action of the Advisory Board in approving the erection of the proposed marker, it would appear reasonable to designate the Blair House a place of national historical interest under the Historic Sites Act. The house could then be given appropriate recognition by the erection of a marker, as it would fall in the second category of historic sites, the establishment of which was approved by you on March 25.
>
> The National Park Service recommends that the design used for the standard national historic site marker be employed for markers on places like the Blair House which may be designated as of national historical interest.[37]

Attached was the text, headlined "National Historical Marker" in lieu of "National Historic Site." Ickes signed his approval on May 29. An understanding that Blair would pay for the marker proved invalid, and the Service was forced to do so. It was installed on the iron fence in front of Blair House in early December.[38]

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[36]Memorandum, Demaray to Ickes, Mar. 16, 1940, approved by Ickes Mar. 25, 1940, Blair House NHL file.

[37]Minutes, 12th Advisory Board Meeting, Mar. 25-31, 1940; memorandum, Cammerer to Ickes, May 23, 1940, Blair House NHL file.

[38]Blair House NHL file. Gist Blair died December 10, 1940, soon after the marker was placed. The government later purchased Blair House,

The general subject of plaques or markers was addressed by the Advisory Board and its Committee on Markers, chaired by Blair, that October. There was discussion of a "national significance marker" of the Blair House type and a "landmark marker," the latter apparently intended for places of lesser importance. "It is recommended that the Board endorse a program of historical markers in principle," the committee reported, "but that the procedure for determining eligibility and awarding markers be further studied by the National Park Service as recommended in connection with the proposed registration procedure, particularly emphasizing the fact thet two kinds of markers be used, one emphasizing the historic significance."[39]

The board approved the committee report but no action followed from it. Because most national significance determinations were kept confidential, there was no way for owners lacking Gist Blair's inside involvement to apply for markers. At the Advisory Board meeting a year later, Ronald Lee explained that the class of historical areas eligible for the other proposed marker had not been established "because of a general study of classifications of Park Service areas which was initiated after Mr. Drury became Director" (in August 1940).[40] America's entry into war soon afterward ruled out further consideration of a marking program.

Blair House would remain the only recipient of a "national historical marker" outside Park Service custody. But its plaque was prototypical of those that would proliferate across the nation beginning 20 years later,

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which under State Department custody became a guest residence for foreign leaders.

[39]Minutes, 13th Advisory Board Meeting, Oct. 28-30, 1940.

[40]Minutes, 15th Advisory Board Meeting, Oct. 28-30, 1941.

when the Service finally undertook to inform the American people of all their greatest historic places.

POSTWAR INITIATIVES AND THE LANDMARKS PROGRAM

Efforts at Resumption

Following World War II, as the National Park Service returned to normal operations, its historical office contemplated resumption of the National Survey of Historic Sites and Buildings. In the spring of 1946 Merrill J. Mattes overhauled its card file, flagging sites that had been considered by the Secretary's Advisory Board, approved or disapproved as nationally significant, and/or acquired by the Service. Associate Director Arthur E. Demaray informed Director Newton B. Drury of the status of the survey. Noting that nine of the fifteen historical themes then employed had been fully surveyed, he declared that "[a] two-year program should be sufficient to complete the six remaining historic site thematic studies, since some material has already been collected."[1]

In July 1947 Chief Historian Ronald F. Lee submitted a budget request and justification for completing the survey. He asked for $100,000 annually for three years beginning in fiscal 1949; two years were to be spent collecting data and one in preparing final reports. The unprecedented funding request stemmed from the need to hire regional investigative staffs, including more archeologists and historical architects; the postwar absence of CCC-funded professionals; and generally higher salaries. Lee justified the survey as essential in the face of accelerating economic

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[1]Memorandum, Mattes to Herbert E. Kahler, May 13, 1946, Historic Sites Survey file, History Division, NPS; memorandum, Demaray to Drury, May 22, 1946, ibid.

development jeopardizing historic site preservation. He also cited the pressures for federal care of sites: "It is impossible to judge intelligently the comparative merits of proposals for historical conservation embodied in pending legislation without completing a comprehensive review of historic and archeological sites in the nation."[2]

Lee proposed soon afterward that the official name of the program be changed to "National Inventory of Historic Sites and Buildings" and that its product be titled "The List of Historic Sites and Buildings Deserving of Preservation in the United States." "Inventory" he viewed as less provocative to those in the Budget Bureau and Congress likely to oppose "just another survey." Acting Director Hillory A. Tolson approved the redesignation, but it was not adopted in practice.[3]

Unsuccessful in reinstating the survey in fiscal 1949, Lee tried again for fiscal 1950. Beyond the justifications previously given, he now emphasized the importance of the survey in advising other federal agencies on disposal of surplus historic properties (as required by a 1947 enactment) and reservoir salvage projects.[4] But there was still insufficient enthusiasm for the program among those who would have to follow through on its funding.

The Service did become involved in several projects involving the recording of historical and archeological data during the late 1940s and early 1950s. Most notable were the river basin surveys, exemplified by the Missouri River Survey, the Arkansas-White-Red River Survey, and the

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[2]Memorandum, Lee to Director, July 1, 1947, Historic Sites Survey file.

[3]Memorandum, Lee to Director, July 22, 1947, ibid.

[4]Memorandum, Lee to Herbert G. Pipes, Sept. 3, 1948, ibid.

New York-New England Survey. The Service cooperated with the Smithsonian Institution, the Corps of Engineers, and universities to identify cultural remains and recover information in areas to be disturbed by dams and reservoirs. A proposed Mississippi River Parkway led to an extensive Service inventory of historic features along its projected route. And the congressionally authorized Boston National Historic Sites Commission benefited from Service support in identifying colonial and Revolutionary War sites. These activities, tied to specific undertakings, added to the corpus of data in the general survey files.

The Proposed National Trust Connection

Even as the Historic Sites Survey was in abeyance, Ronald Lee was concerned about making more effective use of its information. Although it had proved helpful in connection with new park proposals, he later recalled, "a tremendous amount of material was collected that simply went into the files without bearing very much fruit beyond that." Among the factors limiting the survey's utility was the policy of confidentiality. Director Drury shared in the general belief that government disclosure of places found nationally significant would promote pressures for government acquisition, to the certain displeasure of the Budget Bureau.[5]

Lee foresaw a way around this difficulty through the medium of the National Trust for Historic Preservation. Chartered by Congress in 1949 through the efforts of its parent body, the National Council for Historic Sites and Buildings (organized in 1947), the Trust existed to further the

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[5]Transcribed interview by Charles B. Hosmer, Jr., June 29, 1970, p. 4, copy at Harpers Ferry Center, NPS; Minutes of the 23d Meeting, Advisory Board on National Parks, Historic Sites, Buildings, and Monuments, Nov. 2-3, 1950, Cooperative Activities Division, NPS.

purposes of the Historic Sites Act by accepting and administering donations of property and money and otherwise promoting private preservation efforts. Lee and other Service officials played significant parts in bringing the National Council and National Trust into being. So it was natural for the chief historian to look to them whenever a project or program appeared needful of outside aid.

At Lee's behest, Secretary of the Interior Julius A. Krug wrote the president of the National Council, Maj. Gen. Ulysses S. Grant III, in February 1949 to suggest a Council role in the survey and classification work begun by the Service. A year after the chartering of the Trust that fall, Lee expressed to the Secretary's Advisory Board his hope that pressures on the Service for property acquisition would subside now that the new organization existed to share the burden. He proposed that the Trust be made privy to the board's confidential determinations of national significance and that it be encouraged to issue certificates to selected property owners.[6]

During the board's next meeting in April 1951, its Subcommittee on Historical Problems met with General Grant and Frederick L. Rath, Jr., a former Service historian then serving as director of the National Council. Grant said that the Council was considering a program of issuing certificates or plaques to important properties and hoped to begin doing so that summer. He expressed interest in receiving the Service's survey data and the board's determinations. Waldo G. Leland, a former board member

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[6]Letter, Krug to Grant, Feb. 16, 1949, cited in Charles B. Hosmer, Jr., Preservation Comes of Age (Charlottesville: University Press of Virginia, 1981), 2: 848; Minutes, 23d Advisory Board Meeting, Nov. 2-3, 1950.

In practice, the Trust acquired few properties and did little to reduce demands on the Service.

present, suggested that the Council might focus on the "many sites declared of national significance on which nothing has been done or is likely to be done." Ronald Lee, also present with his historical staff, explained why the Service was not pursuing what he called "the landmarks program":

> We have never undertaken a marking program [beyond Blair House]. There was a time when this Board considered the possibility of establishing a marker program. I think that the National Park Service has come to the conclusion that we should not enter into a marker program. When a Federal label is put on a property local interest often wanes. We should not enter into further development of historical markers unless we have some title involved.

Herbert E. Kahler, Lee's assistant, mentioned the problem caused by the Historic American Buildings Survey certificates issued by the Service: in some cases they had fostered misimpressions of ongoing federal interest in the recorded properties.[7]

Later the same day, Lee explained to the full Advisory Board the intended program of the National Council/National Trust:

> The program that the National Council has in mind...is one of giving certificates to perhaps 15 or 20 owners of properties that are not considered to be in jeopardy but which might be better cared for if they received some measure of recognition from the National Trust. The form of recognition proposed is a certificate stating "this is a registered national landmark." General Grant pointed out how frequently the National Council has been receiving appeals for help from societies, local organizations, and individuals regarding sites that the Federal Government never will do anything about. Most likely their future depends upon the local communities rallying their forces and saving them, and as an aid to the rallying of those forces their registration as landmarks is believed to be a very valuable incentive.

The board thereupon resolved that the Service make available to the National Council "for confidential use" a list of those sites it had found nationally significant, plus a list of other sites considered. At the same time, it called for a review of the national significance criteria

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[7]Minutes, 24th Advisory Board Meeting, Apr. 26-27, 1951.

and the sites previously approved under them to determine if any should be reconsidered. Several properties were downgraded as a result.[8]

The plan for the National Trust to take over the "landmarks program" never came to fruition. The Trust was then a fledgling organization, lacking sufficient means and incentive to follow through even to the modest extent envisioned. And the idea that a Trust-sponsored program would have been sufficiently meaningful in lieu of government recognition or help was unrealistic.[9] Although the plan proved to be a second false start, the thinking--and terminology--associated with it would serve to good effect at the end of the decade.

Mission 66 and Reactivation of the Survey

In 1954 the Advisory Board, prompted as usual by the Service, again urged resumption of the Historic Sites Survey. Bernard DeVoto, a board member, noted that the Service had prepared reports on most places in its first eleven historical themes and that only the last four--Commerce, Industry, and Agriculture to 1890; Means of Travel and Communication; Exploitation of Natural Resources to 1890; and The Arts and Sciences to 1870--had never been systematically studied. The board endorsed efforts to seek donated or appropriated funds for completion of the theme studies, "with special emphasis on the formulation of a plan of Federal, State, local, corporate and individual cooperation in the preservation and commemoration of American inventive and industrial achievement.[10]

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[8]Ibid.; Minutes, 28th Advisory Board Meeting, Apr. 18-21, 1953. The National Council and National Trust, often referred to interchangeably by this time, merged under the latter name in 1953.

[9]Telephone interview with Richard H. Howland, Mar. 30, 1984.

[10]Minutes, 31st Advisory Board Meeting, Oct. 25-27, 1954.

The opportunity finally arrived with Mission 66, a ten-year development program begun under Director Conrad L. Wirth in 1956 to improve facilities throughout the National Park System in time for the fiftieth anniversary of the Service. The prospectus for Mission 66, sent by Secretary of the Interior Douglas McKay to President Dwight D. Eisenhower in February 1956, covered an array of activities that the Service had been unable to conduct within its usual budgets. Reactivation of the Historic Sites Survey was proposed in the context of planning for the orderly rounding out of the National Park System, which in turn was justified under the broader heading of nationwide recreation planning called for by the Park, Parkway, and Recreation Area Study Act of 1936. The prospectus, describing the survey as "approximately half completed" when terminated by the war, declared that it needed to be "completed, brought up-to-date, and kept current."[11]

With approval of Mission 66 by the administration and Congress, Ronald Lee, Herbert Kahler, and others in the Service's historical and archeological programs began preparations for resuming survey activities in July 1957 (the beginning of fiscal 1958). That April a planning meeting was held at the Interior Building. Service attendees included Lee, now chief of the Division of Interpretation; Kahler, now chief historian in charge of the Branch of History under Lee's division; staff historians Charles W. Porter, Harold L. Peterson, Rogers W. Young, and Roy E. Appleman; John M. Corbett, staff archeologist; James W. Holland, regional historian in Richmond; Merrill J. Mattes, regional historian in Omaha;

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[11]"Mission 66: To Provide Adequate Protection and Development of the National Park System for Human Use," 120 p. report, January 1956, with cover letter, McKay to Eisenhower, Feb. 1, 1956, Mission 66 file, History Division.

John A. Hussey, regional historian in San Francisco; John O. Littleton, representing the Santa Fe regional office; and Frank Barnes, Charles E. Peterson, and James R. Sullivan from the Philadelphia regional office. Other meeting participants indicated the extent to which outside involvement was envisioned. Waldo Leland represented the American Council of Learned Societies, George E. Pettengill and Earl N. Reed the American Institute of Architects, Laurence Vail Coleman the American Association of Museums, Helen Duprey Bullock and Richard H. Howland the National Trust for Historic Preservation, Virginia Daiker the Library of Congress, Solon J. Buck the American Historical Association, S. K. Stevens the American Association for State and Local History, and Harlean James the American Planning and Civic Association and the National Conference on State Parks.[12]

In August John Littleton assumed direct responsibility for the survey in Washington, and regional survey historians were appointed then or soon thereafter: Frank B. Sarles, Jr., in Richmond, Ray H. Mattison in Omaha, Robert M. Utley in Santa Fe, William C. Everhart in San Francisco, and Charles E. Shedd in Philadelphia. In October the survey historians assembled in Washington for the first of several meetings. There Lee reviewed the old survey activity and stressed the importance of its revival to historic preservation in the face of accelerated highway construction, river basin projects, and urban development. Littleton related the survey to the goal of rounding out the National Park System during Mission 66. To serve this purpose, the survey was to be completed in four years,

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[12]Monthly Narrative Report of History Branch, Apr. 29, 1957, Monthly Reports file, History Division; meeting agenda in Historic Sites Survey file.

or in 1961.[13]

At the same time, a step toward the envisioned outside involvement was taken when Secretary of the Interior Fred A. Seaton and Chairman David E. Finley of the National Trust signed an agreement for cooperation on the survey. Among its provisions, the Secretary pledged "to provide information and data to the National Trust on the progress and results of the Historic Sites Survey, and upon its conclusion give appropriate recognition to the National Trust as a co-sponsor in the final publication." For its part, the Trust agreed to provide information to the Service, including its own findings on sites and buildings it had examined. Although Lee had reiterated the idea of a Trust-sponsored marking program before the Advisory Board earlier that year, the agreement was silent on that point.[14]

Like the earlier negotiations with the Trust, the agreement had scant practical effect. Outside cooperation took a more productive form with establishment of the Consulting Committee for the National Survey of Historic Sites and Buildings in the spring of 1958. Its original membership, half of whom had been at the planning meeting the year before, comprised Waldo Leland, S. K. Stevens, and Louis B. Wright, historians; Earl Reed, Richard Howland, and Eric Gugler, architects or architectural historians; and J. O. Brew and Frederick Johnson, archeologists. The committee was formed to enable closer professional scrutiny of the theme studies

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[13]Minutes, Survey Historians' Meeting, Oct. 1-3, 1957, History Division.

[14]"Agreement Between the Secretary of the Interior and the National Trust for Historic Preservation," Oct. 9, 1957, National Trust for Historic Preservation file, History Division; Minutes, 36th Advisory Board Meeting, Mar. 5-7, 1957.

and identified sites before they were submitted to the less specialized Advisory Board. In line with the expected duration of the survey, the members were appointed for four years.[15]

At its first meeting that June, the Consulting Committee approved another revision of the theme structure: the 16 historical themes and 5 aboriginal categories were combined in a single list of 21 themes, ending with Growth of the United States to a World Power. At meetings of the survey historians, procedures for conducting the theme studies and preparing reports were developed and refined. It was determined that each study would include a preface, a narrative overview of the theme or period, descriptions and evaluations of sites recommended for "exceptional value" classification, maps and photographs, and brief descriptions of other sites considered.[16] Because themes were typically represented by sites in more than one region, coordination among regional survey historians was essential; the one with the heaviest concentration of sites was ordinarily assigned to take the lead and prepare the narrative. As before, political requests for special studies of individual sites forced amendments to work schedules and hampered progress on the theme studies.

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[15]Letter, Conrad L. Wirth to Waldo G. Leland, May 14, 1958, Consulting Committee file, History Division.

The principal if not sole continuing connection of the National Trust with the survey turned out to be its representation on the Consulting Committee. When Howland went to the Smithsonian Institution in 1960, his successor as executive director of the Trust, Robert R. Garvey, Jr., was added to the committee; Garvey, in turn, was succeeded by James C. Massey, the designee of Trust President James Biddle.

[16]Minutes, Special Committee for the National Survey of Historic Sites and Buildings, June 16-17, 1958, Consulting Committee file (the Consulting Committee was so designated for its first year); "The National Survey of Historic Sites and Buildings: Guidelines for the Preparation of Thematic Studies," Sept. 10, 1958, Historic Sites Survey file.

Landmark Designation

"When we were able to start up again in connection with Mission 66," Ronald Lee later stated, "I knew I felt very strongly, if we were going to do this over again, we must devise some method to make the fruits useful whether or not areas were added to the National Park System."[17] In April 1958, having lowered his expectations for National Trust collaboration, Lee proposed to Director Wirth that the Service publicize the list of nationally significant properties "when the present survey is completed":

> The publication of the list would help preservation. It would help the National Trust, State park authorities, and historical and patriotic organizations to focus their attention on important properties. It would encourage private owners to take good care of their properties if they are on the list. It would discourage thoughtless encroachments and other indiscriminating threats to preservation....
>
> It is sometimes argued that publication would bring pressure on Congress to appropriate Federal funds for sites on the classified list. No doubt it would in some instances. However, many of the sites and buildings are in good private or public hands and do not need funds. As for the rest, if there is pressure, that is no new thing. There is pressure without there being a published list, and usually it is for projects of very little merit.

Lee's memorandum went on to recommend support for legislation, such as a pending federal highway act amendment, to deter damage to listed sites from federal projects. He recommended that nationally significant buildings receive high priority in the Historic American Buildings Survey recording program and that Service officials make annual visits to such properties. Finally, recalling the plaque installed at Blair House, he suggested placing "national historical markers" at each nationally significant property whose owner consented, as the survey progressed. Wirth subscribed his approval to the memorandum.[18]

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[17] Interview by Hosmer, p. 4.

[18] Memorandum, Lee to Wirth, Apr. 2, 1958, approved by Wirth Apr. 4, 1958, Landmark Program Procedures file, History Division.

A year later, the Advisory Board considered and concurred in a draft memorandum from Wirth to Secretary Seaton recommending "that the classified list of nationally important historic sites and buildings be made public as phases of the present survey are completed" and that the Interior Department issue certificates to their owners. The memorandum, prepared and refined by Lee and his staff, received Wirth's signature on June 30, 1959.[19]

The memorandum posed as a problem "To utilize most effectively the results of the National Survey of Historic Sites and Buildings." Summarizing the status of the survey and the purposes it had served within the government, it argued that the policy against publicizing the survey's findings had limited its potential value to public and private preservation organizations and the nation as a whole. The solution was seen in "a new category of historic sites and buildings under the Historic Sites Act to be known as Registered National Historic Landmarks." Owners of properties found to possess "exceptional value" would receive certificates from the Secretary "upon application and agreement to certain simple conditions." The memorandum asked that the Secretary approve transmittal of the proposal to the Budget Bureau and the congressional Interior and Insular Affairs committees. "Thereafter, if this plan meets with a favorable response, it is recommended that the results of the survey of each historic phase or period be made available to the public as soon as they have been acted on by the Service, the Advisory Board, and the Department

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[19]Draft memorandum, Wirth to Seaton, Apr. 15, 1959, in Minutes, 40th Advisory Board Meeting, Apr. 20-22, 1959; memorandum, Wirth to Seaton, June 30, 1959, approved by Seaton Nov. 19, 1959, Landmark Program Procedures file.

The June 30 memorandum is reproduced in the appendix.

rather than wait until all parts are completed several years hence."

Four days after the memorandum went up, on July 4, Lee traveled with Wirth and Seaton to the dedication of the Mission 66 visitor center at Cumberland Gap National Historical Park. This gave him an excellent opportunity to promote the national historic landmark concept. The Secretary "expressed much interest," Lee later recalled. "I sold the idea to Secretary Seaton at that time, and we went from there."[20]

Seaton formally approved the memorandum "in principle" on November 19 but asked that no word of the new program go out until the Budget Bureau had approved it and he could personally announce it. On January 11, 1960, he wrote Director Maurice H. Stans of the Budget Bureau to seek his clearance. Anticipating possible objections, the letter minimized the cost of the landmarks program and portrayed it as an attractive alternative to federal acquisition of properties:

> The expense to the Federal Government of the sites in this category would involve issuance of certificates or placement of markers and an annual or biennial inspection by nearby park field officials. We believe this Federal recognition will encourage individuals, organizations, communities and states to preserve and protect important historic sites included in this list and thereby lessen the pressures on the Government to acquire, maintain, and administer them.
>
> A small number of historic sites having preeminent national historical importance will be recommended as additions, when timely, to fill gaps in the National Park System.[21]

Park Service and Budget Bureau staff informally discussed the proposal, enabling Service representatives to cite the analogy of battlefield commemoration by the War Department in the late nineteenth century. By contributing funds for monuments at certain sites, the department had

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[20]Interview by Hosmer, p. 5.

[21]Memorandum, Roy E. Appleman to Herbert E. Kahler, Jan. 4, 1960, Office Memorandum File, History Division; letter, Seaton to Stans, Jan. 11, 1960, Landmark Program Procedures file.

given them federal recognition without ongoing responsibility for operation and maintenance. This approach was appealing to the Budget Bureau in the face of numerous contemporary proposals for Park System additions, and it promptly concurred in the landmarks program.[22]

Secretary Seaton subsequently approved a Service sketch for the landmark certificate and the idea of a bronze plaque. Meanwhile, at its meetings in the fall of 1959 and spring of 1960, the Advisory Board continued to review the results of the reactivated survey and began recommending sites for landmark designation, provided their owners agreed to "appropriate preservation conditions involving no financial responsibility by the Federal Government." On those occasions the board proposed for designation 14 Civil War sites, 11 sites under the Military and Indian Affairs theme, 10 under English Exploration and Settlement to 1700, 42 under Development of the English Colonies, 1700-1775, 26 under Political and Military Affairs, 1783-1830, 9 under The Texas Revolution and the Mexican War, and 4 under The Cattlemen's Empire.[23]

The old concern that governmental recognition of properties as nationally significant would imply federal designs on them was still felt, and a deliberate strategy was pursued to forestall this impression. By naming large numbers of eligible landmarks at a time, attention could be focused as much on the program as on individual sites, owners would not feel that they were being singled out, and the sheer volume of properties

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[22]Telephone interview with Herbert E. Kahler, Apr. 24, 1984; letter, Deputy Director Elmer B. Staats, Budget Bureau, to Seaton, Jan. 26, 1960, Landmark Program Procedures file.

[23]Memorandum, Acting Director E. T. Scoyen to Seaton, Mar. 8, 1960, approved by Seaton Mar. 24, 1960, Landmark Program Procedures file; Minutes, 41st Advisory Board Meeting, Oct. 5-8, 1959; Minutes, 42d Advisory Board Meeting, Mar. 20-23, 1960.

would render unrealistic any notion of an impending federal takeover. The public announcement of the program and the first sites to be honored was therefore delayed until October 9, 1960, when 92 properties had been amassed from the survey and review process. An Interior Department press release on that date quoted Secretary Seaton as emphasizing the voluntary, extra-governmental nature of landmark status:

> The establishment of this Registry serves a long-felt need for the Federal Government to give moral support and recognition to organizations now concerned with the preservation of our archeological and historic properties. Because of the number of historic landmarks in our great Nation, it is manifestly impossible for the Government to acquire or manage these sites or support them financially, although they are an integral part of the American heritage.[24]

The First National Historic Landmark

Although it was included and publicly announced with the 92 properties in the October 9 press release, there was in fact a first national historic landmark. Its designation preceded the others not because it possessed extraordinary merit, but out of political considerations. Indeed, it would be difficult to imagine a site more lacking in historical integrity and authenticity than the Sergeant Floyd Grave and Monument in Sioux City, Iowa.

The site's inadequacies stemmed not so much from the fact that it was a grave, and thus at odds with a general provision in the national significance criteria discouraging recognition of burial places. For the most historically important aspect of Sgt. Charles Floyd's life was his death--the only death of the 1804-1806 Lewis and Clark Expedition, and the first of a United States soldier in the trans-Mississippi Louisiana

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[24]Kahler interview; Press Release, "Secretary Seaton Announces Plan to Register National Historic Sites," Oct. 9, 1960, Press Releases file, History Division.

Purchase. Of natural causes, the death had no real effect on the expedition, but the burial site on a bluff overlooking the Missouri became a point of interest for later travelers. When the shifting river encroached on the bluff in 1857, according to local tradition, Floyd's bones were exposed, recovered, and reinterred by area residents at an unmarked spot some distance back from the original site. The new site was largely forgotten until 1895, when local interest in Floyd revived. Witnesses to the 1857 reburial assembled and uncovered a coffin with some bones again supposed to be those of the sergeant. They reinterred the remains in an urn, and the Floyd Memorial Association succeeded in raising funds for a 100-foot sandstone obelisk to mark the spot. The federal government contributed $5,000 toward the monument, which was dedicated in 1901 and turned over to Sioux City as the focus of a local park.[25]

The natural quality of the bluff and its relationship to the river, compromised in 1877 with construction of a railroad along its base, was further degraded by twentieth century industrial and commercial development. By the mid-1950s the site lacked even the synthetic historical aura it might have possessed, and local history and tourism proponents looked for ways to make it more attractive. Because the city parks department lacked funds and because of the prestige inherent in federal designation, the most vocal faction pushed for Park Service acquisition of the site as a national monument. Erwin D. Sias, a Sioux City newspaper editor, wrote Director Wirth in April 1954 to promote this idea. Wirth was politely negative, citing the Service's general policy against

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[25]National Park Service, Lewis and Clark: Historic Places Associated with Their Transcontinental Exploration (Washington: National Park Service, 1975), pp. 285-87.

gravesites. In February 1956 Rep. Charles B. Hoeven, congressman for the district and a Republican leader in the House, introduced legislation for a study of the site as a potential national monument. Iowa's governor, United States senators, and other political figures roused by Sias pressed the Service, Interior Department, and White House for swift federal action. A Republican National Committee official informed a presidential assistant that Sias was "a good friend of the Party.... His editorial page assistance will be of help in the forthcoming campaign, and it was Congressman Hoeven's idea that everything possible should be done to help get the monument project underway."[26]

To all inquiries, Wirth replied that the Service could take no firm position on the Sergeant Floyd Monument without a full-scale comparative study of all Lewis and Clark sites. Secretary Douglas McKay backed his stand in a memorandum to the White House transmitting a draft response to Iowa's Gov. Leo A. Hoegh: "I recommend that no commitment be made concerning this site pending completion of a comparative Historic Sites Survey, programmed to be undertaken by the National Park Service beginning in Fiscal Year 1958 as part of the MISSION 66 program, to determine which Lewis and Clark Expedition site or sites merit Federal commemorative action."[27]

Survey Historian Ray Mattison, coordinator of the Lewis and Clark theme study, visited Sioux City in November 1957. He judged the bluff a

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[26]Letter, Sias to Wirth, Apr. 3, 1954, Sergeant Floyd Monument National Historic Landmark file, History Division; letter, Wirth to Sias, Apr. 15, 1954, ibid.; H.R. 9604, 84th Congress; letter, J. J. Wuerthner to Howard Pyle, May 28, 1956, Sergeant Floyd Monument NHL file.

[27]Memorandum, McKay to Assistant to the President Howard Pyle, Apr. 12, 1956, Sergeant Floyd Monument NHL file.

significant landmark on the explorers' route but expressed "some question" about the identity of the remains under the monument. In the fall of 1958 the Consulting Committee and the Advisory Board's History Committee gave preliminary consideration to the Floyd Monument and found it lacking national importance. After its review of the completed Lewis and Clark study in April 1959, the full Advisory Board agreed that the monument did not meet the criteria of exceptional value.[28]

That January Representative Hoeven had introduced a new bill providing for national monument establishment, and heated protests followed the board's resolution. Ward R. Evans of Sioux City proposed a compromise to Secretary Fred Seaton: "We feel that if the Department of the Interior does not want to establish this site as a national park at this time, it should at least designate it as a National Historic Site, leaving the upkeep to the City of Sioux City."[29] Pressed, Seaton asked that the Service restudy the site and resubmit it to the Advisory Board at its October 1959 meeting.

The Service saw the handwriting on the wall and groped for an acceptable fallback position. It arrived at the concept of a national memorial commemorating the expedition as a whole, but not within the National Park System. The Advisory Board was persuaded to this novel approach, resolving in favor of national memorial designation by the Secretary under the Historic Sites Act, the memorial to remain in city ownership with a co-

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[28]Memorandum, Mattison to Regional Chief of Interpretation, Jan. 23, 1958, Sergeant Floyd Monument NHL file; Minutes, 39th Advisory Board Meeting, Oct. 20-22, 1958; Minutes, 40th Advisory Board Meeting, Apr. 20-22, 1959.

[29]H.R. 3178, 86th Congress; letter, Evans to Seaton, May 14, 1959, Sergeant Floyd Monument NHL file.

operative agreement.[30] The difficulty with this concept was that Interior lawyers had previously found the Historic Sites Act inapplicable to memorials, and Seaton did not favor congressional action.

At this juncture, the problem of accommodating the unwanted Floyd Monument within the existing framework coincided with the inception of the national historic landmarks program. The site was not immediately perceived as a likely national landmark: the Advisory Board was making its first landmark recommendations at the same time it endorsed the Floyd Monument as a nonfederal national memorial. But the legal difficulty of designating a memorial by secretarial order made the new program the least objectionable alternative. By May 1960 the decision had been made to make the monument the first national historic landmark, and John Littleton was working with Service designers on a plaque and hand-lettered certificate. Secretary Seaton signed the certificate on June 30, and the plaque--larger than the later standard--was shipped to the Omaha regional office in August.[31]

Public announcement of the designation, effective with Seaton's signature, was delayed until October 9, by which time the plaque had been installed on the south face of the monument. At a ceremony the next day --less than a month before the 1960 national elections--NPS Regional Director Howard W. Baker and Assistant Secretary of the Interior George W. Abbott presented the certificate at Sioux City. Baker's remarks described the monument as "an island of history, [surrounded] with a sea of industrial and commercial developments and public works." He also alluded to

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[30]Minutes, 41st Advisory Board Meeting, Oct. 5-8, 1959.

[31]Memorandum, Associate Director E. T. Scoyen to Regional Director, Region Two, Aug. 30, 1960, Sergeant Floyd Monument NHL file.

the political impetus behind the landmark designation: "Our good friend, Congressman Charles B. Hoeven, has worked tirelessly and it was largely through his efforts that the Floyd Monument has received the national recognition it so richly deserves."[32]

Fortunately for the integrity of the program, the first national historic landmark did not set the tone for most others. But the Floyd Monument would not be the last property so honored for reasons other than significance.

Landmarks Progress: Plaques and More "Firsts"

With a few other exceptions, the sites in the first landmark announcement well deserved the new designation. Among them were Bacon's Castle and St. Luke's Church in Virginia, representing the English Exploration and Settlement theme; San Xavier del Bac, Arizona, Palace of the Governors, New Mexico, and Fort San Lorenzo, Panama Canal Zone, representing Spanish Exploration and Settlement; the Hammond-Harwood House, Maryland, Drayton Hall, South Carolina, and Stratford Hall and the Williamsburg Historic District in Virginia, representing Development of the English Colonies, 1700-1775; and the Erie Canal, New York, and four well qualified Lewis and Clark sites representing Advance of the Frontier, 1763-1830.[33]

On December 12, 1960, Secretary Seaton announced 70 more properties as eligible for landmark status. More than a third fell in the Political and Military Affairs, 1783-1830, theme, among them the U.S. Capitol, Mount Vernon, Monticello, The Hermitage, the U.S. Military Academy, and

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[32]Copy of Baker remarks in Sergeant Floyd Monument NHL file.

[33]Press Release, Oct. 9, 1960.

U.S.S. Constitution. The rest were Civil War and Westward Expansion sites. Twelve of the properties in this group later joined the National Park System: Hamilton Grange, Springfield Armory, Lincoln Home, Bent's Old Fort, Fort Larned, Grant-Kohrs Ranch, Fort Bowie, Hubbell Trading Post, Fort Smith, Fort Davis, Palo Alto Battlefield, and the Nancy Hanks Lincoln State Memorial (which became Lincoln Boyhood National Memorial).[34]

The third landmark announcement was issued on January 20, 1961, Seaton's last morning in office. Fifty-one properties were included, from the Prehistoric Hunters and Gatherers, War for Independence, and Overland Migrations theme studies. Among them were the first 19 prehistoric sites, Bunker Hill Monument, and the Gundelo Philadelphia, a Revolutionary War vessel then on the shore of Lake Champlain and soon to be moved to the Smithsonian Institution (making it the first landmark to be permanently relocated). Thus, a total of 213 sites were declared eligible in the last four months of the Seaton administration--a far greater number than designated in any comparable time period thereafter.[35]

Initially and for more than a decade, the Secretary of the Interior announced properties as eligible for landmark designation or "registration." They did not actually become landmarks until their owners signed the standard agreement to maintain their historical character and permit annual or biennial inspections by Park Service representatives. They could then receive the certificate and plaque testifying to their status.

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[34]Press Release, "Additional Sites Recommended for Historic Landmark Status," Dec. 19, 1960, Press Releases file.

[35]Press Release, "Secretary Seaton Recommends Additional Sites for Historic Landmark Status," Jan. 20, 1961, ibid.

In comparison with the Seaton record, some 685 landmarks were designated during the eight years of his successor, Stewart L. Udall.

After 1972, properties were designated national historic landmarks at the outset, and their owners automatically received the certificate; only the plaque became contingent upon execution of the agreement. A purely terminological change was made about the same time when the original "registered national historic landmark" title was shortened by the deletion of "registered." This prefix became redundant and somewhat confusing when the National Register of Historic Places, which included the landmarks, took shape after 1966.[36]

The most prominent tangible aspect of the national historic landmarks program is the bronze plaque. Although the request for Budget Bureau clearance in January 1960 had spoken of certificates or markers, Director Wirth wrote Secretary Seaton that June, "We anticipate that many owners of sites of exceptional value will desire both a certificate and marker." Based on preliminary figures for the Floyd Monument plaque, he estimated the cost of the markers or plaques at $300.[37]

With 163 sites outside the National Park System then classed as eligible, the substantial sum of $48,900 would have been required to fill all orders. This was more than the Budget Bureau was likely to accept, and by the time of the program's public announcement in October, Seaton had decided that owners desiring plaques would have to pay for them. Three sizes would be available, the 21-by-33-inch Floyd Monument plaque exemplifying the largest, and all would contain the same wording.[38]

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[36]Memorandum, Horace J. Sheely, Jr., to Regional Directors, Aug. 22, 1975, Historic Sites Survey file. (A new category of landmark eligibility came into effect in 1980; see page 112.)

[37]Memorandum, Wirth to Seaton, June 7, 1960, approved by Seaton Aug. 10, 1960, Landmark Program Procedures file.

[38]Memorandum, John O. Littleton to Regional Directors, Oct. 18, 1960,

The history office disliked the idea of owners paying for their plaques. Herbert Kahler wrote Wirth in December that this would make it seem that they were being asked to buy recognition. The Service could less readily control display and use of owner-bought plaques, he added, and the public relations benefits of the program would be reduced. Plaques could now be obtained from Lorton Prison Industries for $105 for the Floyd Monument size and $31 for a 17-by-18-inch model. Kahler believed that most owners would prefer the smaller one and that the total number of eligible sites would not exceed 500, of which about a quarter would not request plaques. "If $3,500 could be made available annually for four years to defray the cost of supplying markers, we believe the public relations benefits would be substantial and would amply justify the expenditure," he wrote. Wirth approved giving the smaller plaque to eligible requesters and authorized issuance of the larger one "in special cases."[39]

Plaque production got off to a shaky start, exacerbated by the unstable labor situation in the Washington, D.C., prison at Lorton, Virginia. By September 1961, 130 landmark certificates had been issued but many requested plaques were delayed, occasioning owner complaints. The cost of the smaller plaque rose to about $50; the option of the larger version was discontinued. A step toward simplification was made in mid-1961 when the names of the NPS Director and Secretary of the Interior were deleted from the plaque; their signatures on the certificate were judged sufficient.[40]

Landmark Program Procedures file.

[39]Memorandum, Kahler to Wirth, December 1960 (day missing), approved by Wirth Dec. 28, 1960, Office Memorandum File. (Secretary Seaton was then a lame duck, giving Wirth more latitude for decision-making.)

[40]Minutes, 45th Advisory Board Meeting, Sept. 15-19, 1961; memorandum, Wirth to Stewart L. Udall, June 29, 1961, Landmark Program Procedures

Next to the Sergeant Floyd Monument, Fort Toulouse, Alabama, was probably the most "political," least meritorious, site in the first announcement of landmark eligibles. Based on inadequate information, the eighteenth-century French colonial outpost was presumed to have occupied the same spot as the later, reconstructed, Fort Jackson, but the site's documentation and integrity were such that the Service opposed political pressures for national monument or national historic site designation. As with the Floyd Monument, the new program offered the fort's proponents an acceptable alternative, and it became the second place to receive the national historic landmark plaque. Rep. Kenneth A. Roberts of Alabama presented it to Gov. George C. Wallace in ceremonies on May 22, 1961. Further documentary and archeological research revealed no good evidence for the location of Fort Toulouse. Landmark program officials later recommended withdrawal of its designation, but legal developments and political realities militated against such action.[41]

A property in the second landmark announcement exemplified the opposite response to the program. The property was Monticello, home of Thomas Jefferson, among the most outstanding historic places in the nation for its exceptional combination of associative value and architectural importance. The Advisory Board had found Monticello nationally significant in 1937, and the Service, Interior Department, and even President Roosevelt actively supported its acquisition by the government during World War II. Leaders of the Thomas Jefferson Memorial Foundation, on whose board Roosevelt sat, were willing to consider national

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file.

[41]Fort Toulouse NHL file, History Division; NHL De-designations file, ibid.

historic site designation with a cooperative agreement, and the Service drafted an agreement in 1946, but the foundation lost interest thereafter. When Monticello was declared eligible for landmark designation in December 1960, its owners refused to apply for the plaque and certificate, and the property remained in the eligible category until full landmark status was administratively assigned to such "nonparticipating" sites in the early 1970s. The foundation's attitude toward federal involvement continued unchanged. "Monticello officials give me the feeling of not being wanted whenever I make official visits to that location," a landmark specialist recorded in a 1973 inspection report.[42]

Most historic house museums, lacking Monticello's stature, were delighted to have the landmark plaque as a means of augmenting their prestige. More likely to refuse full participation in the program were owners of properties not open to the public. Some of them feared that landmark designation would attract unwanted visitors. Others, despite official statements to the contrary, feared that designation would lead to eventual federal acquisition. The landmarks program, well received by the general public and most affected owners, was not universally popular.

Notwithstanding the disclaimers made in connection with the program, the "National Park Service-U.S. Department of the Interior" identification on the landmark plaque did cause occasional public confusion about government ownership or administration. There was talk of adding a line to the plaque stating that landmarks were not federally owned, but because some

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[42]Memorandum, Newton B. Drury to Harold L. Ickes, July 3, 1944, Monticello NHL file, History Division; memorandum, Roosevelt to Ickes, July 3, 1944, ibid.; inspection report, Frank S. Melvin, June 1, 1973, ibid.

The coming of a new director to Monticello suggested a possible change in attitude in 1984.

were, this could not be done without complicating manufacture.[43]

In at least two cases the Service-Interior identification caused difficulty within the government. In his first landmarks announcement on July 4, 1961, Secretary of the Interior Stewart L. Udall declared Pikes Peak, Colorado, eligible for designation because of its significance in Western exploration. Pikes Peak was administered by the U.S. Forest Service of the Department of Agriculture, traditional bureaucratic rivals of the Park Service and Interior Department. The announcement reinforced chronic and often-justified Forest Service suspicions of Park Service designs on its domain. Interbureau negotiations ensued leading to two "Memorandums of Understanding on the Designation of National Historic Landmarks in National Forests," signed by Director Wirth and Chief Richard E. McArdle of the Forest Service in January 1962. Among other provisions, they stated that regional foresters would be informed of Historic Sites Survey studies involving their lands and invited to apply for landmark designations under qualifying circumstances.[44]

More than a year later, the regional forester with jurisdiction over Pikes Peak agreed to accept its landmark plaque and certificate. When the plaque arrived, however, his office balked at its inscription and had another cast, substituting "U.S. Forest Service, Department of Agriculture." Explaining this action after yet another year had passed, an assistant regional forester asked Acting Regional Director George F. Baggley, "How would you like to have us erect a plaque at Old Faithful carrying the Department of Agriculture, U.S. Forest Service identification?"

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[43]Minutes, Survey Historians' Meeting, Aug. 31-Sept. 1, 1964.

[44]Memorandums of Understanding dated Jan. 26 and 30, 1962, Pikes Peak NHL file, History Division.

Baggley asked the regional forester to "refrain from installing the plaque at Pike's Peak until a uniform procedure [could] be agreed to" for this and other Forest Service landmarks.[45] Meanwhile, comparable tensions were being generated by Secretary Udall's announcement in May 1963 that the Gifford Pinchot house ("Grey Towers") at Milford, Pennsylvania, was eligible for landmark designation. By unfortunate coincidence, the announcement came just as the property was being donated by Pinchot's son to the Forest Service, which would administer the home of its illustrious pioneer. Secretary of Agriculture Orville L. Freeman ascribed sinister motivation to Udall's action and cited it among several complaints in a letter to the Interior Secretary. Freeman and his staff were duly assured that landmark designation carried no proprietary or acquisitive connotations. To make this publicly explicit, special plaques were ultimately designed for the Pinchot house and Pikes Peak; they specified that the sites were administered by the Agriculture Department and that the landmarks program was administered by Interior.[46]

The standard plaque has undergone minor variation in design and language over the years, but the text has remained similar to the following:

STEPHEN TYNG MATHER HOME
HAS BEEN DESIGNATED A
REGISTERED NATIONAL HISTORIC LANDMARK
UNDER THE PROVISIONS OF THE
HISTORIC SITES ACT OF AUGUST 21, 1935
THIS SITE POSSESSES EXCEPTIONAL VALUE
IN COMMEMORATING AND ILLUSTRATING
THE HISTORY OF THE UNITED STATES
U.S. DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
1963

[45]Letter, Davis S. Nordwall to Howard W. Baker, Apr. 24, 1963, ibid.; memorandum, Baggley to Director, May 27, 1964, ibid.; letter, Baggley to Nordwall, May 27, 1964, ibid.

[46]Letter, Freeman to Udall, June 24, 1963, Gifford Pinchot House NHL

Normally, the only individualized element has been the name of the property. Because the plaque says nothing about why the property deserves landmark designation, some pressed for inclusion of an interpretive message summarizing its significance.

Cost and the potential for controversy over wording argued against individualized interpretation as a general thing. Some owners or interest groups who strongly desired more description made arrangements to acquire custom plaques, however. One recipient of such a plaque was the former Carnegie Endowment for International Peace headquarters in Washington, D.C., designated a landmark in 1974. The Carnegie Endowment, which had moved to New York in 1948, cooperated with the General Services Administration (then custodian of the property) and the Park Service to obtain a large plaque incorporating the standard wording and then elaborating on the building's history. The location of the building next to Blair House with its descriptive "national historical marker" may have influenced this special arrangement.

The subject of Blair House arose again officially in 1973. Considering the property that October during a reexamination of the Political and Military Affairs, 1828-1860, subtheme, the Advisory Board "recommended that the landmark status [sic] granted in the initial studies of the National Survey of Historic Sites and Buildings be affirmed." NPS Director Ronald H. Walker explained to Secretary of the Interior Rogers C. B. Morton that the board had found Blair House nationally significant on October 29, 1937. "A National Historic Marker was subsequently placed at the site by the National Park Service, but this was prior to the initiation of the

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file, History Division; other documentation ibid.; telephone conversation, Merrill J. Mattes, July 10, 1984.

Landmark Program in 1960," he wrote. "Blair House was not covered into the Landmark Program at its inception, and the Advisory Board believes that the technical steps necessary to clarify this situation should be undertaken.... This will be handled as an internal matter only, and will not be the subject of any publicity, or notification to the Department of State" (custodian of the building). Morton signed a prepared memorandum ordering the landmark designation, which the Service backdated to October 29, 1937, in its publications. By this maneuver, Blair House replaced the Sergeant Floyd Monument as the "first" national historic landmark.[47]

A third and more dubious contender for "first landmark" honors materialized soon afterward, in December 1973, when Monocacy Battlefield, Maryland, received the designation effective June 21, 1934! An act of Congress approved on the 1934 date had authorized establishment of the Civil War battlefield as a national military park, but the land donation necessary for the park never occurred. In the early 1970s, when a highway project threatened the area, local citizens and their representatives in Congress moved to revive the park project. As a first step they sought listing of the battlefield on the National Register of Historic Places, which would impede the expenditure of federal highway funds. Register listing ordinarily followed a process of documentation and nomination by the state, but the 1934 legislation afforded a shortcut. Interpreted as a determination of national significance by Congress, it enabled Secretary Morton to declare Monocacy Battlefield a national historic landmark

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[47]Minutes, 69th Advisory Board Meeting, Oct. 1-3, 1973, p. 43; memorandum, Walker to Morton, Oct. 16, 1973, Blair House NHL file, History Division; memorandum, Morton to Walker, Oct. 26, 1973, ibid.; National Historic Landmarks: A Preservation Program of the National Park Service (Washington: National Park Service, 1976), p. 26.

without prior documentation and Advisory Board review. Landmark designation automatically put the battlefield on the National Register; the standard documentation form could be completed and the boundary drawn after the fact. Notwithstanding the praiseworthy purpose served by this ploy, the Service's listing of Monocacy Battlefield as a landmark predating the 1935 Historic Sites Act--which authorized the program--defies logic.[48]

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[48]48 Stat. 1198; letter, Associate Director Ernest Allen Connally to Sen. Charles McC. Mathias, Jr., Dec. 18, 1973, Monocacy National Battlefield file, History Division; National Historic Landmarks, p. 57.

Most of Monocacy finally came into the National Park System as a national battlefield following a 1978 amendment to the 1934 act; however, enough of the battlefield remains outside the authorized park boundary to justify retention of the larger national historic landmark.

THE PROGRAM PERPETUATES

Survival of the Survey

The Historic Sites Survey, reactivated in 1957 under the ten-year Mission 66 program, was projected to operate for four years or until 1961. As typical with government undertakings, however, a little more time (and money) was called for. By the middle of 1963 only 27 of more than 40 planned theme studies (covering 22 themes) were finished. A booklet published by the National Park Service in 1964 stated that the survey was "scheduled for completion in 1966"; but an internal document of the same date hedged. "Recent plans call for completion of the major portion of the Survey by the close of 1966 calendar year," it declared. "However, some additional studies will be made at the request of the Secretary, Congress, etc., and as new information from historical and archeological research becomes available."[1]

When President Lyndon B. Johnson praised the landmarks program in his February 1965 message to the Congress on natural beauty, its future seemed assured. "The Registry of National Historic Landmarks is a fine Federal program with virtually no cost," the message stated. "I commend its work and the new wave of interest it has evoked in historical

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[1]National Park Service, "Mission 66 Progress Report," October 1963, Mission 66 file, History Division, NPS; A National Program for the Conservation of Historic Sites and Buildings: The Registered National Historic Landmark Program (Washington: National Park Service, 1964); "Brief Statement on the National Survey of Historic Sites and Buildings and the Registry of National Historic Landmarks," April 1964, Landmark Program Procedures file, History Division.

preservation." The next published description of the program, later that year, deleted any mention of its completion. In the absence of recorded opposition, the survey went forward thereafter in open-ended fashion, without a programmed termination date.[2]

With the landmarks program thus institutionalized, it was no longer necessary or politic to speak of completing any of the theme studies. (If elements of the program could be completed, so could the whole program, putting it out of business.) Asked in 1976 which themes had been fully studied, Cornelius W. Heine, then chief of the division overseeing the survey, was unwilling to place any in that category:

> [T]he passage of the last decade has changed our vision with respect to the past and many historic properties have assumed a significance we formerly could not have recognized. So, even though a number of themes have technically been studied the original studies now appear superficial and revision of them is urgently needed.... In a recent calculation we estimated that Architecture alone could require a minimum of 11 man-years of work. The remaining subthemes would require 36-52 man-years of effort.[3]

The landmarks program found a strong supporter in George B. Hartzog, Jr., who succeeded Conrad Wirth as Park Service director in January 1964 and served through 1972. An effective advocate of National Park System expansion, Hartzog saw and used the program as a means to that end. For this purpose and for their public relations value to the Service, he sought as many national historic landmarks in as many congressional districts as possible.[4]

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[2]"Natural Beauty of Our Country," House Document No. 78, 89th Congress, Feb. 8, 1965; Sites Eligible for the Registry of National Landmarks (Washington: National Park Service, 1965).

[3]Letter, Heine to Edward B. Danson, July 8, 1976, file A1619PS, History Division.

[4]Interview with Robert M. Utley, Apr. 9, 1984.

To depict the relationship between landmark designation and qualification for the Park System, Hartzog had the landmarks criteria published in a brochure titled Criteria for Parklands; it showed that although potential historical parks had to meet additional requirements, the national significance criteria for parks and landmarks were identical. In 1970 he ordered preparation of The National Park System Plan, which listed all parks under their historical and natural themes to demonstrate where the gaps in the System's representation of American history and natural history lay. The historical component of the plan included a thematic listing of existing landmarks, "[s]ince the National Historic Landmarks constitute the largest potential source of additional historical areas needed to round out existing gaps in the National Park System." In connection with this project, the theme structure was recast in a more rational form: under nine broad themes were 43 subthemes, which became the basic study units; these were further divided into some 280 facets. The theme structure now in use (see appendix) is essentially that adopted in 1970.[5]

The Historic Sites Survey underwent a significant organizational change in 1966, when the regional survey historian positions were phased out. Although the arrangement had given the historians greater familiarity with the sites in their areas than could be achieved by basing them in Washington, it had not been ideal. The initial idea that regional

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[5]Criteria for Parklands (Washington: National Park Service, 1967); Part One of the National Park System Plan: History (Washington: National Park Service, 1972), pp. vi-viii, 93.

Responding to a question about his involvement with the landmarks criteria, Hartzog told the author, "If you write it down, put it in a nice-looking brochure, and send it out, nobody is going to believe you didn't know what you were doing." The National Park System Plan was Hartzog's response to Office of Management and Budget pressures for some assurance of when the System would finally be "rounded out."

historians would be able to revisit and monitor their sites regularly had not worked in practice. Sites were not evenly balanced by region, making for inequitable workloads. The library and archival resources in the regional office cities usually compared unfavorably with those in Washington. It was not always easy to maintain a national perspective when responsible primarily for one region. Most important, it became difficult to justify the expense of a survey historian in each of six regions.[6] Accordingly, S. Sydney Bradford of the Northeast Region and Horace J. Sheely, Jr., of the Southeast Region moved to Washington, Charles W. Snell of the Western Region transferred to the Washington office "on paper" while retaining his duty station in San Francisco, and the rest were reassigned to other duties. Sydney Bradford became acting chief of the survey branch upon John Littleton's retirement in mid-1966; he was succeeded by Horace Sheely as permanent chief in early 1967.

Of tremendous significance to the overall preservation movement in 1966 was enactment of the National Historic Preservation Act,[7] the most consequential law in the field since the Historic Sites Act of 1935. The 1966 act broadened the Service's concern and responsibilities to encompass properties of state and local as well as national significance. It authorized matching federal grants-in-aid to the states for the survey, acquisition, and preservation of historic properties. And it set a requirement, to be overseen by the new Advisory Council on Historic Preservation, that federal agencies must weigh the effects of their projects on historic properties. The properties within the act's purview were to be

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[6]Interview with Horace J. Sheely, Jr., Feb. 21, 1984.

[7]P.L. 89-665, Oct. 15, 1966, 80 Stat. 915.

listed in a comprehensive National Register of Historic Places, initially comprising the national historic landmarks and historical units of the National Park System, expanded thereafter by properties nominated by historic preservation officers in each state.

An Office of Archeology and Historic Preservation was established in the Washington office in 1967 to oversee the Service's increased responsibilities. Ernest Allen Connally, a former professor of architecture and architectural history, headed OAHP, as it was called; William J. Murtagh, another architectural historian, became Keeper of the National Register. Although the landmarks were included in the National Register, Horace Sheely's Branch of Historical Surveys was left under Robert M. Utley's Division of History. Connally chose not to combine the landmarks program and the National Register organizationally for several reasons. The former was running well under Utley and Sheely, unlike certain other functions in OAHP, and he did not want to risk its efficiency by reorganizing it. Because of Director Hartzog's personal interest in the landmarks program, Connally wanted to keep it independent and responsive to his needs. The divergent personalities and professional emphases of Murtagh and Sheely also counted against an amalgamation: Sheely was a traditional historian upholding associative values in historic preservation; Murtagh emphasized aesthetic and environmental values to compensate for what he perceived as undue stress on the "Washington slept here" syndrome.[8]

The 1966 act gave no preference to national historic landmarks in its grants-in-aid and protective provisions. This was deliberate on the part of the act's framers, for experience with categories of significance

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[8]Interview with Connally, Apr. 25, 1984.

in municipal and foreign preservation planning had demonstrated that the lowest category often became expendable. It was not intended that the locally significant properties on the National Register, whose neglected virtues were now stressed, should be so regarded. The landmarks therefore became no more than the "honor roll" of the Register.[9] The benefits possible to all Register entries--financial aid and review protection against federal undertakings--did enhance the appeal of landmark designation to many eligible property owners who previously had little concrete incentive to participate.

The protective provision of the 1966 act--Section 106--necessitated greater precision in the definition of landmarks. As with other nominations to the National Register, landmarks now needed to be more carefully described in terms of the features contributing to their significance that could be impaired by actions affecting them. They also required precise boundaries, verbally and graphically delineated. A special project to set boundaries for the early landmarks lacking such began in 1974; within two years the Historic Sites Survey had sent some 740 "boundary packages" to the National Register office. The boundary review process moved slowly and was still incomplete in mid-1984.[10]

The Historic Sites Survey remained organizationally tied to the History Division and its National Park System branch until 1973, when the Office of Archeology and Historic Preservation was reconstituted to deal exclusively with programs external to the Park System. The survey was separated from the History Division, now focusing solely on park matters,

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[9]Ibid.

[10]Telephone interview with Nola B. Klamberg, June 8, 1984.

and made a component of the reorganized OAHP. Unfortunately for the landmarks program, this arrangement exacerbated the tension that had sometimes existed between its personnel and those responsible for the broader National Register program. Rather than integrating their functions with the broader program, the survey leadership tended to work autonomously, outside OAHP's mainstream. The survey's seeming unresponsiveness weakened its position in the new organization.[11]

New demands and competing pressures on the organization contributed further to a decline in the standing of the landmarks program. The Tax Reform Act of 1976, which provided tax benefits for rehabilitating commercial buildings on the National Register, stimulated an increase in Register nominations, required Park Service certification that buildings to be rehabilitated were on the Register or contributed to Register districts, and required additional Service certification that the work met qualifying standards. The resulting workload increase was not matched by increased OAHP staffing and funding, causing the Historic Sites Survey and other more discretionary programs to suffer as resources were shifted to respond to the new requirements. Most survey activity was suspended in late 1976 to assist with a growing backlog of state Register nominations.[12]

The greatest threat to the survey's traditional mode of operation came with the simultaneous proposal to halt Service-conducted and contracted theme studies. Under this plan, approved in concept by Ernest

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[11]Connally interview; interview with Jerry L. Rogers, May 1, 1984.

[12]P.L. 94-455, Sec. 2124, Oct. 4, 1976, 90 Stat. 1916; Rogers interview; letter, Acting Chief George F. Emery, Historic Sites Survey Division, to William G. Shade, Feb. 28, 1977, file A1619-772, History Division.

Connally as "the direction we want to go," OAHP would identify a sufficient range of existing landmarks in 19 deficient subthemes as comparative "benchmarks," ask the state historic preservation officers to begin submitting their recommendations for landmarks, and shift the major responsibility for landmark nominations to the states by 1980. A survey staff remnant would review the state nominations, conduct special studies that could not be referred to the state historic preservation officers, and guide nominations and studies through the Consulting Committee and Advisory Board.[13]

The survey staff resisted the proposal, arguing that the states would lack the national perspective essential to evaluations of national historical significance. But Connally and Jerry L. Rogers, his deputy in charge of OAHP, favored it as cost-effective and a natural extension of the federal-state partnership they had fostered in the National Register program. The first phases of the plan were implemented beginning in late 1976. The results over the next year were not promising, at least as measured by the survey staff. Of 90 nominations from 34 states, they viewed only six properties as reasonable candidates for landmark designation. They found nearly half the submissions lacking the comparative context essential for evaluation.[14] The proponents of the plan, motivated by cost considerations and skeptical of the staff's objectivity, were unwilling to abandon it; but there was little follow-through on

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[13]"Status Report on the Landmark Procedures," Aug. 16, 1976, with Connally notation Aug. 19, 1976, NHL Procedures and Guidelines file, History Division; memorandum, George F. Emery to Connally, Nov. 11, 1976, ibid.; Issue Paper, Nov. 29, 1976, ibid.

[14]Interview with Benjamin Levy, Feb. 27, 1984; Rogers interview; NHL Program Assignments/Priorities file, History Division.

the state nominations.

In January 1978 the Office of Archeology and Historic Preservation was taken from the National Park Service and placed in a new Interior Department bureau, the Heritage Conservation and Recreation Service (HCRS). Soon afterward, the American Historical Association newsletter and other historical association publications reported that the national historic landmarks program was to be disbanded. Responding to several public protests, bureau and department officials stated that the program was not being discontinued, only that site identification was changing from federal theme studies to state initiative:

> As grants-in-aid funds have increased in recent years, the States have been able to assume more responsibility for surveys, including the identification of sites of national significance. We will continue the high-calibre consultative review process by eminent historians. This change will make it possible for us to more economically employ our limited personnel in meeting the increased responsibilities imposed by other legislation, such as the Tax Reform Act of 1976.[15]

All staff theme study work ceased, leaving in progress only some uncompleted surveys under contract to the American Association for State and Local History.

The following year what Ernest Connally had declined to do in 1967 occurred: the Historic Sites Survey Division lost its organizational identity and was subsumed under the National Register Division. Jerry Rogers, now deputy associate director for cultural programs in HCRS, arranged the merger to reduce staff, save money, and force improved

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NHL Program Assignments/Priorities file, History Division.

[15]"National Historic Landmarks Program to be Disbanded," American Historical Association Newsletter, April 1978; letter, Assistant Secretary Robert L. Herbst to Zetna U. Andrews, July 1, 1978, NHL Procedures and Guidelines file.

The former, in his view, still suffered from unresponsiveness to direction and unconcern for the needs of the overall preservation program. "The only way to fix it was to dismantle it, brick by brick," and try to reassemble it thereafter, he later said of his action.[16]

Reassembly began on May 30, 1981, when Secretary of the Interior James G. Watt abolished HCRS and transferred its functions back to the National Park Service. Most of its historic preservation programs, dealing with resources and activities outside the parks, were kept together under their own associate directorate, headed by Jerry Rogers. But landmark identification and designation was given to the History Division, the park-related office from which the program had been divorced in 1973.

This seeming anomaly in the reorganization occurred through the intervention of F. Ross Holland, Jr., who oversaw the History Division as the Service's associate director for cultural resources management and who served on the task force charged with reintegrating the HCRS functions. Disturbed about the recent fate of the landmarks program, Holland wanted to revive it under his wing and sold NPS Director Russell E. Dickenson on the move. Jerry Rogers, who planned to revive the program himself, disliked having it taken from him, but his complaints came too late. He ultimately came to preside over the reborn survey activity when the two associate directorates were merged under his leadership in 1983.[17]

The landmarks program was justified for placement in the History Division based on its traditional relationship to expansion of the National

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[16]Rogers interview.

[17]Telephone interview with Holland, June 11, 1984; Rogers interview.

Park System. This was not the time to promote it as a contributor of proposed parks, however. Since Director Dickenson's appointment in May 1980, the Service and Interior Department had changed course, seeking to upgrade existing parks rather than acquire new ones. "Today we take a broader view of stewardship...no longer assuming that preservation and public appreciation are always best assured by Federal ownership," Dickenson wrote in a 1982 document replacing George Hartzog's National Park System Plan. "In this light, the National Historic Landmarks program attains heightened significance as a supplement to the National Park System in recognizing outstanding cultural properties." Seen as a supplement rather than a contributor to the Park System, the program under the History Division was also presented as helping to thwart unworthy park proposals. "While the designation of National Historic Landmarks does provide a pool for potential inclusion into the National Park System, its most practical application is to provide the benchmarks against which most requests for inclusion into the System can be rebutted," Ross Holland stated.[18]

This had been a longstanding function of the Historic Sites Survey and landmarks program, if never before so emphasized. "The number of impractical and unworthy projects that 131 million citizens can think up is infinite...," Charles W. Porter had written in 1943. "The moral force of the disinterested studies of the National Park Service technical staff, combined with the impartial arbitration of the question before the Advisory Board, is such that Congressmen can, in most cases, withdraw their

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[18]History and Prehistory in the National Park System and National Historic Landmarks Program (Washington: National Park Service, 1982), p. 2; memorandum, Holland to Deputy Director Mary Lou Grier, Mar. 23, 1982, NHL Program file, History Division.

assistance from unworthy projects without embarrassment, since they can say to their constituents that the matter has been given thorough consideration by a trained staff and an impartial Board established by Act of Congress to handle questions of this type." The case of Ferry Farm, George Washington's boyhood home near Fredericksburg, Virginia, exemplified this "negative" use of the survey. At its first meeting in 1936 the Advisory Board declined to recommend the site, devoid of remains associated with Washington, for the Park System. Local citizens resurrected the proposal on several occasions, and in the early 1970s it again threatened. The Service presented a restudy of Ferry Farm to the board in 1974 with the expectation of obtaining another unfavorable recommendation. The board did not disappoint, and the Service relied upon its position in successfully opposing park legislation.[19]

Notwithstanding the greater emphasis on its negative utility, the landmarks program returned to the Park Service bolstered by specific legal recognition and charged with positive tasks that would again demonstrate its broad value as the "mechanism for determining what this country's nationally significant cultural resources are," according to NPS Chief Historian Edwin C. Bearss.[20] The background, nature, and implications of its new legal status and the tasks now occupying its staff will be addressed later in this chapter.

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[19]Porter, "Statement on the Operation of the Historic Sites Act, August 21, 1935-December 1943," Historic Sites Survey file, History Division; Minutes of the 1st Meeting, Advisory Board on National Parks, Historic Sites, Buildings, and Monuments, Feb. 13-14, 1936, Cooperative Activities Division, NPS; Minutes, 70th Advisory Board Meeting, Apr. 22-24, 1974.

[20]Letter, Bearss to J. Rodney Little, Nov. 5, 1981, file H34, History Division.

Broadening the Criteria

During his first year in office, Director Hartzog selected Robert M. Utley to replace the retiring Herbert E. Kahler as chief historian. As a former survey historian at the Santa Fe regional office, Utley was well versed in the conduct of the program. He shared Hartzog's predeliction for broader application of the landmarks criteria to encompass a wider range of properties than had been favorably considered before--a direction that occasioned some controversy.[21]

Views about what was historic had evolved since 1941, when the Advisory Board rejected Theodore Roosevelt's Sagamore Hill estate because the house had been built after 1870. This fixed cutoff date for consideration was replaced in 1952 with a more lenient "50-year rule," employed to the present with minor rewording, that requires 50 years to have elapsed since a property achieved historical importance "unless associated with persons or events of transcendent significance." The criteria were tightened in 1963 to make explicit the Service's longstanding aversion to birth and burial places "except in cases of historical figures of transcendent importance"; it was explained that "[h]istoric sites associated with the actual careers and contributions of outstanding historical personages usually are more important than their birthplaces and graves." In Utley's view, however, there were kinds of properties that ought to be recognized and aided for which the criteria he inherited made inadequate provision.[22]

"The increasing concern with historic preservation in urban areas...

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[21]Utley interview.

[22]Minutes, 15th Advisory Board Meeting, Oct. 28-30, 1941; Minutes, 26th Advisory Board Meeting, Apr. 21-22, 1952; Minutes, 48th Advisory Board Meeting, Mar. 25-27, 1963; Utley interview.

has pointed up new needs that were not foreseen when the administrative criteria were adopted," Utley wrote. "Rarely are the individual historic structures preserved or restored in historic districts 'nationally significant' by reason of individual architectural merit or individual association with a significant person or event. Their value lies rather in their collective capacity to recall the ways and forms of the past and thus to provide a visual continuity between the past and the future." Accordingly, he prepared a criterion for historic districts that did not require every building in them to be nationally significant so long as the totality was.[23]

Utley was also concerned that the program had been overly strict about integrity, or the degree to which a property retained its historic fabric and aspect. Whereas the Historic Sites Act spoke of places commemorating <u>or</u> illustrating American history, the criteria had specified that landmarks should commemorate <u>and</u> illustrate. "As a result," Utley commented,

> the Landmark program has excluded a category of sites that do not illustrate but may indeed commemorate events or persons of national significance. A large share of these lie within our cities, where much of the Nation's history was made and where change has been most constant and profound. There are important sites that have been covered by urban development, and there are important buildings whose "original materials and workmanship" have been so altered as to impair their illustrative value.
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> For the Landmark program, the consequences of this administrative criterion have been an imbalance in its coverage of the Nation's history, especially in urban areas, and a failure to attain fully the objective set by the Historic Sites Act to "erect and maintain tablets to mark or commemorate historic or prehistoric places and

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[23]"Revision of the Administrative Criteria of Historical Significance Adopted Pursuant to the Historic Sites Act of August 21, 1935," 3 p. typescript, undated but early 1965, Landmark Program Procedures file.

The change was motivated by a desire to use the Historic Sites Act as authority for providing technical assistance to the Housing and Home Finance Agency to preserve historic buildings in urban renewal districts.

events of national historical or archeological significance." He therefore broadened the integrity criteria to allow, for example, the site of a vanished structure to possess national significance "if the person or event associated with the structure was of transcendent historical importance in the Nation's history and the association consequential."[24]

John Littleton, the survey head, complained to his new chief that the program's objective was not to commemorate or illustrate American history, but to select the sites that did so. A site lacking integrity could neither illustrate nor commemorate, he argued: "When we put up a marker there we are doing the act of commemorating but not the site. If it has no integrity it has nothing left by which to commemorate." Littleton did not prevail. The Advisory Board and Secretary Udall approved the revised criteria in the spring of 1965, and they remained substantially unchanged thereafter.[25]

The perpetuation of the Historic Sites Survey as an ongoing, open-ended program, greater pressures from both outside and inside the Service to recognize more properties, and the broadening of the national significance criteria all tended to a lowering of the threshold for landmark designation. Another factor in this tendency was the pivotal National Historic Preservation Act of 1966, extending the Service's purview to properties of less than national significance. The considerable attention paid this "new preservation," which stressed aesthetic and environmental

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[24]Ibid.

[25]Memorandum, Littleton to Utley, Jan. 4, 1965, Office Memorandum File, History Division; Minutes, 52d Advisory Board Meeting, Apr. 12-15, 1965.

See regulations in appendix for current criteria in full.

benefits to community life, was accompanied by some depreciation of the "old preservation," portrayed as overemphasizing associative values and museum-type properties isolated from contemporary social concerns. Properties of local or regional significance nominated by the states soon far outnumbered the national historic landmarks on the National Register of Historic Places. No longer the centerpiece of the Service's preservation program, the landmarks program would now have to compete--to show that it too was socially relevant. In doing so, it would address topics and places beyond its previous ken, and national significance would become subject to looser construction.

The Black Landmarks and Other Departures

The striving of the landmarks program for "relevance" was most visibly illustrated in its efforts, beginning in 1971, to identify and designate black history sites. Virtually no landmarks honoring black Americans then existed, an embarrassing circumstance at that time of increasing black awareness and empowerment. Robert Utley was sensitive to the omission and aware that the Historic Sites Survey, without blacks on its professional staff, would lack credibility in the black community were it to undertake a study of black sites on its own. After exploring contract possibilities with the Association for the Study of Negro Life and History and Ebony Associates, Inc., of Chicago, he concluded that a third group, the Afro-American Bicentennial Corporation, had the best ties to black scholars and was most suited to the task. ABC was headed by two brothers, Vincent DeForest and Robert DeForrest, and its letterhead listed Mary F. Berry, John W. Blassingame, Sen. Edward Brooke, Rep. Shirley Chisholm, Rep. Ronald W. Dellums, Sen. Edmund S. Muskie, Dorothy B. Porter, Benjamin

Quarles, Edgar A. Toppin, and Charles H. Wesley among the members of its advisory board.[26]

George Hartzog was enthusiastic about Utley's initiative, and the two of them encouraged Robert DeForrest to approach Rep. Julia Butler Hansen, chairman of the House subcommittee on Interior appropriations, for special funding. She too was receptive, and the Service found $180,000 for an ABC contract in its fiscal 1973 budget. The contract would be renewed through mid-1976, for a total of $540,000.[27]

The ABC's historical projects staff began by surveying three themes: Development of the English Colonies, 1700-1775, Major American Wars, and Society and Social Conscience. Thirty sites in these themes were nominated by the ABC advisory board and reviewed by the Historic Site Survey's Consulting Committee, to which Dorothy Porter of Howard University was appointed, and the Secretary's Advisory Board, to which Edgar Toppin of Virginia State University was appointed. From these, in July 1974, Secretary Rogers C. B. Morton designated 13 landmarks, among them the Dexter Avenue Baptist Church in Montgomery, Alabama (Martin Luther King, Jr.'s church during the bus boycott); the Ida B. Wells-Barnett House, Chicago; the Harriet Tubman Home for the Aged, Auburn, New York; and the Stono River Slave Rebellion Site in South Carolina. Continuing ABC survey efforts led to additional designations in May 1976 and March 1977, contributing a total of 61 black landmarks.[28]

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[26]Utley interview; memorandum, Utley to Director, Office of Finance and Management Control, Oct. 6, 1971, Afro-American Bicentennial Corporation Contract file, History Division.

[27]Utley interview; ABC Contract file.

[28]Press Release, "National Historic Landmark Status Given 13 Black History Sites," July 1, 1974, Press Releases file, History Division;

This achievement, unfortunately, was not reached without tension among the parties involved and damage to the integrity of the landmarks program. Committed to maximizing the number of black landmarks, ABC sought to nominate properties for as many individuals and events as possible, with little regard for the concept of site integrity and the significance of relationships between the sites and their subjects. When the Service staff criticized the quality of ABC submissions, Robert DeForrest accused them of a double standard in reviewing landmark nominations (which indeed existed--in ABC's favor). The Consulting Committee and Advisory Board initially resisted approving substandard sites, but fears of causing offense led to a marked decline in the rigor of their review. As Utley later put it, "blacks could then be very intimidating" to whites susceptible to guilt feelings about past inaction. As a result, the black landmarks included such places as the Jean Baptiste Point Du Sable Homesite, where a black fur trader had settled in what later became Chicago, now an urban plaza without a trace of historical integrity; the William E. B. DuBois Boyhood Homesite in Great Barrington, Massachusetts, similarly lacking any remains to commemorate or illustrate its subject; and an arbitrarily selected former boundary stone of Washington, D.C., to commemorate Benjamin Banneker, who had helped fix the initial survey point of the District's boundary nine miles away.[29]

Frank E. Masland, Jr., a former chairman of the Secretary's Advisory Board, regretted the selection of landmarks on racial grounds. "I

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releases of May 11, 1976, and Mar. 18, 1977, ibid.

[29]Memorandum, Benjamin Levy to Assistant Director, Archeology and Historic Preservation, Jan. 21, 1974, ABC Contract file; letter, DeForrest to Cornelius W. Heine, Jan. 23, 1975, ibid.; Levy interview; Utley interview; individual NHL files, History Division.

thoroughly approve recognizing by landmark status...'sites or structures' that qualify but I have great difficulty in convincing myself that recognition by race is conducive to national homogeneity or that in doing so the policy is a consistent one," he wrote NPS Director Gary Everhardt after the last black landmark announcement. "When we recognize a site or structure that exists because of some action by an 'English American,' do we so indicate?" Replying for Everhardt, George F. Emery of the Historic Sites Survey declared the black sites study an exception to the survey's policy of treating ethnic group history incidentally within the normal course of theme studies.[30]

The less desirable products of the Afro-American Bicentennial Corporation collaboration were not unprecedented, as will be recalled from the first two landmark plaque recipients in 1960-1961. Other early exceptions to the landmark program's generally high quality of production further illustrate the nonprofessional influences to which it was often subject and occasionally succumbed.

Political appointees within the Interior Department sometimes constituted such influences. Undersecretary James K. Carr, a friend of leaders of the California salmon canning industry, diverted two Park Service historians from their regular duties in early 1964 to research the history of the first cannery at Sacramento. Director Hartzog arranged to present the site of the cannery for landmark consideration at the next Advisory Board meeting, but Carr was unwilling to wait on such formalities. Without professional review, a landmark plaque and certificate were prepared, and Carr presented them to cannery industry officials at an April 29

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[30]Letter, Masland to Everhardt, Mar. 22, 1977, file H34, History Division; letter, Emery to Masland, Apr. 5, 1977, ibid.

ceremony in Sacramento. Unfortunately, the cannery site was nonexistent: the cannery had been on a scow anchored in the Sacramento River, and there were no remains. The plaque identifying the First Pacific Coast Salmon Cannery Site as a national historic landmark was installed nearby on the grounds of a motel, implying that the cannery had been ashore on that spot.[31]

Later that year departmental influence was brought to bear on behalf of another vanished feature. The first self-sustaining nuclear reaction had occurred in December 1942 in a converted squash court beneath the west stands of Stagg Field at the University of Chicago, and the university was raising funds for a Henry Moore sculpture to commemorate the event. Although the structure housing the nuclear pile had been demolished and the site was now just a grass plot between two tennis courts, a university vice president and former political associate of Secretary Udall proposed national historic landmark designation as a means of boosting the memorial project. Walter Pozen, a Chicago alumnus in Udall's office, saw that the proposal was favorably presented at the October Advisory Board meeting, notwithstanding that there had been no comparative or special study by the Historic Sites Survey. "It was the feeling of the Board that, even though the integrity of the site at the University of Chicago was in question, the experiment which took place there was of such magnitude that the site should be recommended for landmark status," Robert Utley recorded afterward. Pozen arranged a special landmark ceremony in Udall's office before word was released of 26 other new landmarks so that

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[31]First Pacific Coast Salmon Cannery Site NHL file, History Division.

they would "not detract from the impact of the Chicago announcement."[32]

While the Site of the First Self-Sustaining Nuclear Reaction might have passed muster without external pressure--its historical importance compensating for its lack of integrity--the same could not be said for the William H. McGuffey Boyhood Home Site near Youngstown, Ohio. The best property associated with the Eclectic Readers author, his house in Oxford, Ohio, was found eligible for landmark designation in December 1965; his boyhood home site, on a farm now subdivided and lacking structural remains, had been examined but properly found wanting. Disappointed with this decision, a private group who sought to develop the boyhood site as an "Educators' Hall of Fame" approached their congressman, Chairman Michael J. Kirwan of the House subcommittee on Interior appropriations.[33]

Kirwan met with George Hartzog who, ever responsive to his appropriations chairman, ordered immediate restudy of the site and a positive recommendation in time for the April 1966 Advisory Board meeting. Hartzog assigned Assistant Director Howard R. Stagner, Robert Utley's boss and a non-historian, to the task rather than involve Utley and his staff in what he knew was a professionally insupportable action. After visiting the site, Stagner presented it to the board as "symbolic of all the forces and influences that shaped McGuffey's thinking and prepared him for the important role he was to play in future years." The board knew the site was unqualified, but it also knew of the politics involved and was willing

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[32]Minutes, 51st Advisory Board Meeting, Oct. 5-14, 1964; memorandum, Utley to Regional Director, Northeast Region, Nov. 3, 1964, First Self-Sustaining Nuclear Reaction NHL file, History Division; letter, Charles U. Daly to Udall, Nov. 19, 1964, ibid.; letter, Pozen to Daly, Nov. 20, 1964, ibid.

[33]William H. McGuffey House NHL file, History Division; William H. McGuffey Boyhood Home Site NHL file, ibid.

to do a favor for Kirwan in appreciation for the support he had regularly given the Park Service. It voted accordingly, and the following month the William H. McGuffey Boyhood Home Site joined his Oxford house on the landmarks register. "Although no structures dating from McGuffey's youth remain and the farm has been subdivided," the Service announcement declared unenthusiastically, "the site is considered to be symbolic of the forces and influences which shaped his life."[34]

On another occasion the chairman of the Advisory Board played a decisive part in a dubious landmark designation, that of the James Monroe Law Office in Fredericksburg, Virginia. Oak Hill, Monroe's estate in Loudoun County, Virginia, during his presidency, was the finest Monroe site and had been among the second group of landmark eligibles announced in 1960. The law office, in contrast, had been briefly occupied by Monroe during an obscure period in his life, contained later furnishings unrelated to the structure, and was impaired by a modern wing. Its greatest strength was Laurence Gouverneur Hoes, a Monroe descendant and president of the James Monroe Memorial Foundation, who persistently sought federal recognition for the memorial library and museum his organization had developed there.

Horace Sheely of the Historic Sites Survey was dispatched to study the Fredericksburg property in September 1966 and returned with negative views, in which Robert Utley concurred. Aware of the Service's disincli-

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[34]Letter, Hartzog to Kirwan, Feb. 10, 1966, McGuffey Boyhood Home Site NHL file; Minutes, 54th Advisory Board Meeting, Apr. 18-21, 1966; Utley interview; Press Release, "President's Boyhood Home, 14 Other Sites Recommended as Historic Landmarks," May 23, 1966, Press Releases file.

Hartzog ordered the landmark plaque cast even before the site's owner, who thought landmark designation meant the government would buy his property, was persuaded to apply for it.

nation, the well-connected Mr. Hoes came to Washington soon afterward to press his case to the Virginia congressional delegation, Rep. Morris K. Udall (Stewart's brother), and Assistant Director Howard Stagner. Proving most effective would be a letter to his longtime friend Melville B. Grosvenor, president of the National Geographic Society and chairman of the Advisory Board. When Sheely presented his report to the historical subcommittee of the board in October, Grosvenor made a special appearance. He cited his friendship with Hoes, called his property "a shrine to Virginians," and declared that "when a descendant or family makes an effort of this kind it is a very fine thing to encourage them...any help we can give them is worthwhile...all they want is a little recognition." The subcommittee and board were swayed to his position, and Secretary Udall approved the law office for landmark status in November.[35]

The question of multiple landmarks for historical figures like McGuffey and Monroe received special attention when Robert Frost came to be honored in 1968. The late poet, a favorite of President John F. Kennedy and Secretary Udall, was championed on the Advisory Board by Wallace E. Stegner. The Service identified three Frost sites, expecting the board to select the best. At Stegner's instigation, the board proceeded to recommend all three for designation. Edward B. Danson, Jr., noted that most United States presidents had only one landmark and called attention to the 50-year rule, violated by two of the sites in that Frost had not lived there that long ago. His colleagues discounted his concerns, and the board went on to pass a related general resolution: "It is the

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[35]Oak Hill NHL file, History Division; memorandum, Sheely to Utley, Sept. 28, 1966, James Monroe Law Office NHL file, ibid.; memorandum, Utley to Stagner, Sept. 28, 1966, ibid.; letter, Hoes to Grosvenor, Sept. 29, 1966, ibid.; Minutes, 55th Advisory Board Meeting, Oct. 3-6, 1966.

policy of the Advisory Board to recommend for National Historic Landmark designation as many surviving sites or buildings representing a person, event, or theme in American history as meet the approved criteria of national historical significance." Secretary Udall carried out the board's recommendation on the Frost residences (two in Vermont, one in New Hampshire), making the poet one of a very few personalities honored by three landmarks.[36]

The loosening of the 50-year criterion evidenced by two of the Frost landmarks was another liberal tendency in the application of the landmarks criteria over time. Although the criteria allowed exceptions for properties associated with subjects of "transcendent significance," this qualification was questionable for Frost and was surely stretched to the breaking point for such figures as Claude McKay, the black poet whose New York City residence from 1941 to 1946 was made a landmark in 1976. In favor of approving sites of more recent significance, it was sometimes argued that they would not survive if 50 years had to elapse. Recognition of persons and events of contemporary interest was also encouraged by the underlying drive for "relevance." Some program participants, like Consulting Committee chairman Richard H. Howland, opposed this trend, insisting that sufficient historical perspective could not be brought to bear without the passage of more time.

Howland, who believed that the 50-year criterion was being "flagrantly flouted," could take comfort in the 1978 decision on Kent State

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[36]Minutes, 58th Advisory Board Meeting, Apr. 16-18, 1968; Utley interview.

Utley had no philosophical problem with multiple landmarks for outstandingly important people but did not believe that Frost could be placed in that category so soon after his death (in 1963).

University. The site there was that of the May 4, 1970, incident in which four students were killed by Ohio national guardsmen during a period of antiwar protests and radical violence on and around the campus. The site soon attained symbolic importance both within and beyond the antiwar movement. When the university proceeded with plans to build a gymnasium nearby, there were student protests, and in July 1977 members of the Ohio congressional delegation asked for a landmark study. Announcement of the study triggered volumes of public correspondence supporting and condemning landmark recognition, depending on the political and social views of the writers. James W. Sheire of the Historic Sites Survey conducted the study and presented it to the Consulting Committee in March 1978. Well aware of the controversy, the committee concluded that it was too soon to make a definitive evaluation of the site's national significance. The Advisory Board concurred, and Secretary Cecil D. Andrus declined to make it a landmark.[37]

The Kent State episode was not the first time the Historic Sites Survey had entered or elicited public controversy. Initially it had deliberately avoided dealing with properties likely to offend: following an Advisory Board recommendation, a list of places sent to the regions for study in 1937 omitted "all sites of contemporary or near contemporary nature which might lead to controversial questions." This posture was reaffirmed in 1952 in the face of proposals by South Dakota interests to make the 1890 Wounded Knee battlefield a national monument or national historic site. Aware that many considered the affair an unjustified

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[37]Telephone interview with Howland, Mar. 30, 1984; Kent State file, History Division; Summary Minutes, Consulting Committee, Mar. 3, 1978, History Division; Minutes, 78th Advisory Board Meeting, Apr. 17-19, 1978.

massacre of Indians by United States troops, the Advisory Board resolved to "take no action on the engagement at Wounded Knee in view of its highly controversial character." On three later occasions between 1955 and 1961 the board did take a position on the site, judging it to lack national significance. With Sen. Karl E. Mundt of South Dakota still pressing for recognition, the board took up Wounded Knee for a fifth time in October 1965. Robert Utley, a noted historian of military-Indian relations, was now present to plead its case. Declaring that it had been rejected before mainly because of the controversial nature of the event, Utley argued that Wounded Knee no longer engendered such bitterness and should be judged—favorably—solely on significance. The board was persuaded, and Secretary Udall approved Wounded Knee Battlefield for landmark status that December.[38]

(Utley's analysis of current feeling about Wounded Knee proved overly optimistic. Indian activists who regarded the historic episode as a massacre were offended by the "battlefield" designation, and the plaque bearing that label had to be installed inside a memorial museum for security. Park Service plans to study the area for addition to the National Park System—Senator Mundt's objective—were shelved in 1969 out of sensitivity to the ongoing controversy surrounding it. In 1973 the American Indian Movement occupied Wounded Knee, ransacked the museum, and made off with the landmark plaque.)

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[38]Memorandum, Acting Director Arthur E. Demaray to Regional Directors, Nov. 30, 1937, Advisory Board General Correspondence file, History Division; Minutes, 27th Advisory Board Meeting, Nov. 17-18, 1952; Minutes, 33d Advisory Board Meeting, Sept. 7-9, 1955; Minutes, 41st Advisory Board Meeting, Oct. 5-8, 1959; Minutes, 44th Advisory Board Meeting, May 14-19, 1961; Minutes, 53d Advisory Board Meeting, Oct. 4-7, 1965; Wounded Knee Battlefield NHL file, History Division.

Two landmark announcements in November 1966 also aroused public animosity, of somewhat lesser fervor and consequence. Among the sites found nationally significant in the Commerce and Industry theme was the Anheuser-Busch Brewery in St. Louis, dating from 1868. "To what depths has America fallen that it could thought [sic] a brewery, dispensing death over the land, hunger for children, broken homes, etc. etc., should be accorded a place of honor...," a local Woman's Christian Temperance Union official wrote Secretary Udall in response. "Think and pray a bit, brother." The Park Service reply called attention to the prior landmark designation of the home of Frances Willard, a former WCTU president, and explained that "[d]esignation...does not imply an evaluation of moral values, but of the historical significance of the site or structure recognized."[39]

Landmark status for the Eugene V. Debs house in Terre Haute, Indiana --also in the Commerce and Industry theme--engendered more opposition. The press release announcing it described Debs as a founder of industrial unionism; it said nothing about his Socialist Party affiliation and jail terms for illegal striking and sedition. When they learned that Secretary Udall would personally present the landmark plaque and certificate at his house in September 1967, those aware of and offended by Debs's radicalism were quick to respond. "I tremble when I think our government will dedicate the Debs home as a United States shrine...," one woman wrote her congressman. "The Socialist-Communist plan to destroy the American way of life is the same.... Would you please ask President Johnson and Sec. of Interior Stewart L. Udall to halt this infamous proceeding?" A man

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[39]Letter, Rev. E. V. Campbell to Udall, Apr. 20, 1967, Anheuser-Busch Brewery NHL file, History Division; letter, Deputy Director Harthon L. Bill to Campbell, May 8, 1967, ibid.

wrote Udall, "I know that politics makes strange bedfellows, but I still am surprised that a high federal official would participate in a memorial to a man who was twice a federal convict." Rep. John Rarick of Louisiana denounced the action in the House: "Mr. Speaker, when this place is officially dedicated by Secretary Udall it will signify a slap in the face of every American who has fought for his country." The Service's standard reply stated that Debs had been recognized only for his role in unionism and called attention to the simultaneous landmark recognition given such "safe" industrial personalities as Henry Ford and E. H. Harriman. Udall was undeterred from attending the ceremony, where his presence was calculated to affirm administration support for the labor movement.[40]

When explaining the national historic landmarks program in connection with controversial sites, the Service regularly contended that landmark designation constituted a neutral recognition of historical importance rather than an "honoring" of the subject involved. In reality, the idea that designation entailed a degree of honoring could not be so easily dismissed. The Service's leaflet describing the program spoke of landmarks as "among the most treasured" tangible reminders of the nation's history. The homes of unmitigated scoundrels, however great their influence, were not made landmarks (unless justified on architectural grounds). The rhetoric at landmark dedication ceremonies was often filled with references to the great and good works of the persons whose properties were being recognized. And while the moral neutrality of a mere listing of sites

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[40]Press Release, "Fifty-Seven Sites Recommended for Historic Landmark Status by Parks Advisory Board," Nov. 13, 1966, Press Releases file; letter, Lillian Shephard to Rep. Robert V. Denney, Aug. 21, 1967, Eugene V. Debs Home NHL file, History Division; letter, P. A. Haas to Udall, Sept. 25, 1967, ibid.; Rarick remarks in Congressional Record, Sept. 21, 1967, p. H12357; Utley interview.

might have been credible, it was difficult for the general public not to view the bronze plaque as a sign of official sanction or approval.

Presidential Landmarks

As America's closest approximation to royalty, presidents and their families have been subjects of great popular interest. Sites associated with or commemorating the lives and careers of the presidents, partaking of this interest, have figured importantly in National Park Service preservation programs.

The first historical unit of the National Park System in the East was George Washington Birthplace National Monument, acquired in 1930. By the early 1960s it had been joined by sites for John and John Quincy Adams, Thomas Jefferson, Abraham Lincoln, Ulysses S. Grant, and the two Roosevelts. Outside the System, through the efforts of the Historic Sites Survey, 25 presidential sites were declared eligible for national historic landmark designation by 1965. Ranging chronologically from Mount Vernon to the birthplace of John F. Kennedy, they included such significant spots as James Madison's Montpelier and Andrew Jackson's Hermitage and such lesser attractions as the homes of Franklin Pierce and James Buchanan.

President Lyndon B. Johnson, conscious of his own place in history, arranged for the reconstruction of his birthplace on the LBJ Ranch and the restoration of his boyhood home in Johnson City, Texas, while still in office. In the fall of 1964 he let Secretary Udall know that he wanted federal recognition for the boyhood home. Interior and Park Service officials feared adverse public reaction to what might be viewed as unseemly self-commemoration by the president. Seeking to diffuse the potential controversy, Chief Historian Robert Utley prepared letters for Udall's

signature to Harry S Truman and Dwight D. Eisenhower, the two living ex-presidents, inviting them to suggest sites of their own for landmark designation. Eisenhower named his Gettysburg farm; Truman postposed a decision.[41]

The Service conducted perfunctory comparative studies of Johnson and Eisenhower sites, the conclusions of which were foreordained once the presidents had stated their preferences. At the next Advisory Board meeting, in April 1965, the survey staff duly recommended landmark status for the Johnson boyhood home, the Eisenhower farm, and properties associated with four other presidents. Utley was still opposed to landmarks for the living, however, and found sympathy there for his position. The board removed the Eisenhower and Johnson sites from the list sent up to Udall, telling him that "living persons, however important their functions may be or have been, should not be memorialized."[42]

High-level displeasure over the fate of the Johnson landmark nomination was conveyed to George Hartzog, and his duty in the matter became clear. During an Advisory Board field trip to Alaska that August, the director persuaded the members that all presidents--including living and incumbent ones--were sufficiently important to merit recognition. At its fall meeting, the board accordingly resolved that "an election by the citizens of the Nation of a President is in itself an event of transcendent

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[41]Utley interview; letter, Udall to Truman, Dec. 24, 1964, Harry S Truman Historic District NHL file, History Division; letter, Udall to Eisenhower, Dec. 24, 1964, Eisenhower NHS file, ibid.; letter, Eisenhower to Udall, Jan. 4, 1965, ibid.; letter, Truman to Udall, Jan. 19, 1965, Truman Historic District NHL file.

[42]Utley interview; memorandum, Chairman Wallace E. Stegner to Secretary of the Interior, Apr. 15, 1965, in Minutes, 52d Advisory Board Meeting, Apr. 12-15, 1965.

historical importance" and that "upon the election of any man as President of the United States, an appropriate site be identified and considered for classification as a National Landmark." The Johnson and Eisenhower sites were resubmitted for favorable board action in April 1966, and Secretary Udall thereafter announced landmark status for the Johnson home. Eisenhower wanted no publicity, so the simultaneous designation of his farm did not appear in the announcement. Truman finally consented to landmark status for his Independence, Missouri, home and its surrounding area in 1971.[43]

While it was certainly appropriate to consider the views of living presidents, ex-presidents, and family members in evaluating their properties for landmark designation, adherence to their wishes--difficult to escape once they were asked--did not necessarily result in the best landmarks. Sites chosen in this way were as likely to reflect nostalgia or public relations considerations as objective judgments of significance in the presidents' careers.

The LBJ Ranch clearly illustrated Lyndon Johnson's importance in American history better than his boyhood home; yet he had fond memories of the boyhood home, and unlike the ranch it was accessible to the public. (Both properties would later be included in the Lyndon B. Johnson National Historical Park.) When President Richard M. Nixon was asked for his landmark recommendation he specified his birthplace in Yorba Linda, California, rather than his current residence at San Clemente, with its important

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[43]Utley interview; memorandum, Chairman Wallace E. Stegner to Secretary of the Interior, Oct. 7, 1965, in Minutes, 53d Advisory Board Meeting, Oct. 4-7, 1965; Minutes, 54th Advisory Board Meeting, Apr. 18-21, 1966; Press Release, "President's Boyhood Home, 14 Other Sites Recommended as Historic Landmarks," May 23, 1966, Press Releases file; letter, Truman to Clifton Daniel, Sept. 3, 1971, Truman Historic District NHL file.

associations with his presidency. The Service and Advisory Board deferred to his wish, and Secretary Morton made the birthplace a landmark in 1973. Rose Kennedy's personal involvement in reacquiring and refurnishing the Brookline, Massachusetts, house where John F. Kennedy was born led to its designation as a landmark in 1964 and its admission to the National Park System three years later; President Kennedy's home at Hyannisport, far more deserving of such attention, escaped recognition until 1973 when it was included in an unpublicized landmark designation of the still-occupied family compound there. Similarly, through the efforts of Herbert Hoover's son and others, President Hoover's birthplace in West Branch, Iowa, rather than his long-time residence in Palo Alto, California, was made a landmark and then added to the Park System in 1965. (The highly qualified Palo Alto house waited until 1984 for landmark status.)

The decision that every president should have a landmark (or unit of the Park System) led to some further diminution of the integrity of the program, for no good properties existed for some. In those cases it was felt necessary to designate whatever could be found. "Although his occupancy was brief, the history of the structure is obscure, and it has been relocated and extensively altered," a Service publication says of Millard Fillmore's residence in East Aurora, New York, the house was the only place extant (other than the White House) associated with the thirteenth president.[44] It became a landmark in 1974. No residence of any kind survived for William McKinley, so his tomb in Canton, Ohio, was designated in 1975. With that action, every president but the incumbent, Gerald R. Ford, was duly honored by the Park Service. (At this writing

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[44]The Presidents (Washington: National Park Service, 1976), p. 474.

Ford and his successors remain unrecognized by landmarks, but a Jimmy Carter National Historic Site is envisioned at Plains, Georgia.)

The Publications Program

In his vision of the national historic landmarks program, Ronald F. Lee had seen publication of the survey results as an important aspect of its value to the preservation movement and the public. To carry out this function, John Porter Bloom was hired in February 1962 as editor of a projected book series. He was succeeded in August 1964 by Robert G. Ferris, assisted by Richard E. Morris and, after 1967, by James H. Charleton.

The editors' task was to convert the typescript theme studies into attractive published books suitable for a general audience. Like the theme studies, the books would include an introductory narrative treating the general subject, followed by descriptions of the associated landmarks, units of the National Park System, and "other sites considered." Sixteen volumes were originally planned in 1963, rising to 18 in 1965. Their proposed subjects and titles roughly followed the theme structure, with certain variations and combinations:

I. Prehistoric Hunters and Gatherers

II. Early Indian Farmers/Indian Villages and Communities

III. Contact with the Indians

IV. Indigenous Peoples and Cultures

V. "Explorers and Settlers"

VI. "Colonials and Patriots" (1700-1783)

VII. The Formative Years (1783-1830; 1763-1830 for the frontier)

VIII. Emergence of the United States (political and military affairs, including the Civil War, 1830-1910)

IX. The Trans-Mississippi West: Lewis and Clark, Explorers, Fur Trade

X. The Trans-Mississippi West: "Westward Destiny" (Santa Fe Trail, Texas Revolution, Mexican War)

XI. The Trans-Mississippi West: "Pickax, Lasso, and Plow" (farming, mining, and cattlemen's frontiers)

XII. The Trans-Mississippi West: "Soldier and Brave" (military-Indian affairs)

XIII. The Newest States: Alaska

XIV. The Newest States: Hawaii

XV. The Economic Growth of the United States (commerce, industry, agriculture, scientific discoveries and inventions, transportation, communication)

XVI. The Cultural Growth of the United States (education, literature, drama, music, painting, sculpture, social and humanitarian movements)

XVII. Architecture

XVIII. Conservation of Natural Resources[45]

The composition of the projected series reflected the interests of those responsible for the program. That four of the 18 volumes focused on the trans-Mississippi West was attributable in part to Robert Utley's professional orientation. The enormous and diverse fields of economic and cultural history lacked similar champions and were squeezed into only two volumes. Awareness of this striking imbalance led to a reworking and expansion of the projected series to 36 volumes by 1973, giving more equitable treatment to such themes as education and social and humanitarian movements.

The first to appear was Volume XII, Soldier and Brave, in 1963. The prominent Western historian Ray Allen Billington wrote the introduction,

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[45]Landmark Books file, History Division. Quotation marks indicate actual or proposed titles.

and the book was commercially published by Harper and Row. An issue arose thereafter about the copyrighting of material prepared by government employees and the granting of exclusive rights to one firm; in addition, Harper and Row wanted to handle only those titles it believed were profitable. It declined to take the next volume readied, Colonials and Patriots, which was turned over to the Government Printing Office and published in 1964. GPO handled the series thereafter.[46]

At the beginning of 1965 Utley forecast that eight years would be needed to produce the remaining 16 volumes at current budget levels. Acting on a suggestion from Conrad Wirth, he sought foundation support to expedite publication. It was not forthcoming, and production proceeded far more slowly than expected. Volume XI, retitled Prospector, Cowhand, and Sodbuster, and Volume VII, Founders and Frontiersmen, appeared in 1967, followed the next year by Volume V, Explorers and Settlers. Utley found the original Soldier and Brave "too much an expression of the John Wayne-Indian-fighting syndrome...badly out of harmony with the present national climate regarding ethnic and minority groups," and he personally prepared a new edition issued in 1971.[47]

The first volume of the expanded series was Signers of the Declaration: Historic Places Commemorating the Signing of the Declaration of Independence, published as Volume XVIII in 1973 and revised in 1975. Next came Volume XIII, Lewis and Clark, in 1975 and Volume XIX, Signers of the Constitution, in 1976. Volume XX, The Presidents, also appeared in 1976;

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[46]Ibid.

[47]Memorandum, Utley to Regional Director, Northeast Region, Feb. 4, 1965, ibid.; Utley interview; memorandum, Utley to Emil Haury, Jo Brew, and Ned Danson, Oct. 20, 1969, Advisory Board General Correspondence file.

it was revised in 1977 to include Jimmy Carter. A third 1976 volume, Here Was the Revolution by Harlan D. Unrau, was a substantial revision of part of Colonials and Patriots produced by the Service's Professional Publications Division. It was not numbered in the survey series but adopted the series format.

The book program influenced and was influenced by Service and Advisory Board decisions that each element of certain classes should be represented by a landmark. The board's 1965 resolution that every president of the United States should be recognized stimulated the book on the presidents and related sites. Similar efforts were devoted to finding suitable landmarks for each signer of the Declaration of Independence and the Constitution. A 1967 Advisory Board resolution advanced this goal for the former category, and Charles W. Snell of the Historic Sites Survey researched most of the associated sites. Here the reviewers wisely stopped short of forcing a landmark for every individual, as several of the signers could not be firmly linked to extant properties of any integrity. Button Gwinnett of Georgia, for example, was represented in Signers of the Declaration only by an "other site considered"--a much-modified structure whose "original portion...may have been built" by that obscure signer. A landmark for another Georgia signer, George Walton, was designated and published in the book only to be exposed later as a property he had never occupied; another Walton site was thereupon elevated to landmark status in 1981.[48]

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[48]Memorandum, Chairman Melville B. Grosvenor to Secretary of the Interior, Dec. 3, 1966, in Minutes, 56th Advisory Board Meeting, Apr. 17-19, 1967; Signers of the Declaration (Washington: National Park Service, 1973), p. 176; College Hill NHL file, History Division; Meadow Garden NHL file, ibid.

The spurious Walton residence, College Hill, remains a landmark.

Director Hartzog was a particular advocate of the survey books for their public relations value. Copies were sent to all members of Congress, many of whom responded appreciatively. Rep. Julia Butler Hansen, Michael Kirwan's successor as chairman of the House Interior appropriations subcommittee, was a strong supporter of the publications program and saw that funding for it was maintained. With Hartzog's departure at the end of 1972 and Mrs. Hansen's retirement two years later, its official and political patronage was somewhat reduced; yet the years 1975-1977 saw heavier-than-usual production, and The Presidents proved to be the fastest seller of the series with 29,000 copies purchased by November 1981. Two other book manuscripts, "Yankee and Rebel" on the Civil War and "Educators and Teachers" on education, were prepared under contract by the American Association for State and Local History during that period but were rejected as deficient in research and writing.[49]

In March 1978, after the Historic Sites Survey had been shifted to the Heritage Conservation and Recreation Service, Chairman Sidney R. Yates of the House Interior appropriations subcommittee quizzed HCRS Director Chris T. Delaporte and Associate Director Ernest Connally about the book program at a hearing. Connally told Yates that the program cost between $150,000 and $200,000 annually but was unable to answer a specific question about the cost of publishing The Presidents. Although the chairman was not overtly critical of the program, Delaporte twice promised that he would personally approve all such publications in the future.[50]

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[49]Interview with James H. Charleton, Apr. 2, 1984; Utley interview. The Government Printing Office had sold 211,097 copies in the book series by November 1981. Three of the early volumes had higher total sales than The Presidents, but over longer periods.

[50]U. S. Congress, Committee on Appropriations, Department of the

Correctly sensing that the program was in jeopardy, Connally and Robert Ferris sought to expedite publication of the remaining books. They proposed to reduce the historical introductions, averaging around 100 pages, to historical "backgrounds" of 10-12 pages, leaving greater emphasis on the historic site descriptions--the books' unique contributions. Connally hoped that this streamlined approach would persuade Delaporte to allocate more money to the book program, but Delaporte declined to do so. That November, faced with what he considered higher priorities, he ordered suspension of all his bureau's non-technical publications. Material readied under the title "Sectionalists and Nationalists," dealing with antebellum political and military affairs, was recalled from the printer, and work begun on "Reformers and Humanitarians" ceased.[51]

The landmarks program returned to the National Park Service in 1981 with little money and personnel for its basic survey function, much less book publication. Its managers proposed that Eastern National Park and Monument Association, a nonprofit body assisting the Service and its parks, assume responsibility for the remaining books, but this arrangement did not materialize. Resumption of the series was not in sight at this writing.

Landmarks in the National Park System

National historic landmark designation was originally intended only for places of national significance outside the National Park System.

Interior and Related Agencies Appropriations for 1979, Hearings, 95th Congress, 2d Session, Mar. 6, 1978, Part 3, pp. 783-86.

[51]Memorandum, Ferris to Connally, June 30, 1978, Landmark Books file; Connally interview; memorandum, Delaporte to Connally, Nov. 2, 1978, Landmark Books file; Charleton interview.

For the first 16 years of the landmarks program, the Historic Sites Survey did not consider anything in the Park System--whether in a historical, natural, or recreational park--for landmark designation. Sites in the System importantly related to survey themes were referenced in the theme studies, but no action was taken on them. When a site designated a landmark was later added to the Park System, as often occurred, it was removed from the landmarks list.

This policy caused no difficulty so long as the site in or added to the System bore or received a designation--such as national historic site or national historical park--denoting its national historical significance. In such instances, landmark designation would have been redundant. But an injustice was done when a site was denied or lost landmark recognition because it fell within a park whose title and reason for being did not reflect the significance of the site. When Congress authorized Indiana Dunes National Lakeshore in 1966, Bailly Homestead in Porter County, Indiana, was stripped of its landmark status solely because of its inclusion within the boundaries of that park area. The same happened to Fort San Carlos, a landmark in Pensacola, Florida, when Gulf Islands National Seashore incorporated it in 1971. The Cape Hatteras Lighthouse in Cape Hatteras National Seashore, the William Floyd House in Fire Island National Seashore, the Second Bank of the United States in Independence National Historical Park, The Wayside in Minute Man National Historical Park, and Ellis Island in Statue of Liberty National Monument were among the park properties found nationally significant by the Advisory Board but denied landmark status, even though the parks containing them existed mainly for natural, recreational, or unrelated historical values.

A breach in the wall of separation between landmarks and national

parklands first appeared in November 1976 when Acting NPS Director William J. Briggle, in a memorandum prepared by the History Division, announced that "a resource whose primary significance is not related to its park's purpose can be designated a National Historic Landmark." A year later, in a special directive signed by Director William J. Whalen, the new policy and procedures for implementing it were fully articulated. "Nationally significant historic properties in the System but not in historical parks and such properties in historical parks whose national significance is unrelated to their parks' primary themes are now eligible for landmark designation," the directive declared. It reinstated landmark status for Bailly Homestead, Fort San Carlos, and seven component units of Boston National Historical Park, "which, although supporting that park's theme, are each so distinct and important as to warrant individual identification as landmarks." It ordered that properties in the category of Cape Hatteras Lighthouse and Ellis Island, formerly denied landmark recognition although found nationally significant, be resubmitted to the Advisory Board and Secretary of the Interior for designation. And it asked field offices preparing National Register nominations of park historic resources to evaluate important properties against the landmarks criteria. "Properties recommended as nationally significant," it pledged, will be given special review in the Washington Office and will be considered by the Advisory Board and the Secretary for landmark designation when warranted."[52]

Implementation of the Whalen directive was slowed if not halted by

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[52]Memorandum, Briggle to Regional Directors, Nov. 8, 1976, Historic Resources Briefing Book, author's possession; Special Directive 77-9, Whalen to Washington Office and Field Directorate, Oct. 26, 1977, ibid.

the transfer of the landmarks program to the Heritage Conservation and Recreation Service three months later and the subsequent reduction of the program under that bureau. Return of the program to the Park Service in 1981 stimulated belated action. Field nominations of the historic Potomac Canal in the George Washington Memorial Parkway, Virginia, and the steam schooner Wapama in Golden Gate National Recreation Area, California, led to landmark status for those properties. Harry A. Butowsky of the History Division documented historic military features in Gateway National Recreation Area, New Jersey, for what received landmark designation as the Fort Hancock and Sandy Hook Proving Ground Historic District. At this writing a theme study was being planned to identify and recognize significant examples of rustic architecture in the older parks, such as Old Faithful Inn at Yellowstone and El Tovar Hotel at Grand Canyon.

No longer would important sites and structures be denied public awareness of their national historical significance because they lay within national parklands.

Green Springs and Its Consequences

In November 1966 the owner of Tudor Place, a national historic landmark in the Georgetown section of Washington, D.C., deeded a scenic easement on the outstanding Federal-style mansion and grounds to the United States (represented by the Interior Department and National Park Service). The easement, donated to help insure preservation of the property in perpetuity, prevented the land from being divided, limited exterior changes to the main house, and restricted the house to residential or museum use.[53]

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[53]Tudor Place NHL file, History Division.

The precedent of the Tudor Place easement was recalled in 1973 when Green Springs, a rural section of Louisa County, Virginia, distinguished by fine old homes and bucolic landscape, was threatened by proposals for vermiculite mining and a state prison facility. Preservation-minded property owners formed Historic Green Springs, Inc., prevailed upon the Park Service and Interior Secretary Rogers Morton to make the Green Springs Historic District a national historic landmark (designated May 1974), and urged Interior officials to accept development-restricting easements that they had vested in their nonprofit corporation. (Only federal ownership of easements would preclude their condemnation by the state or county.) Championed in the department by Deputy Assistant Secretary Douglas P. Wheeler, the Green Springs easement proposal inspired a general programmatic proposal for Interior to accept donated preservation easements on landmarks.[54]

The Service was unenthusiastic. Associate Director Ernest Connally wrote Wheeler in December 1973, "[A]cceptance of easements could not fail to establish a government obligation to take extraordinary measures to meet any threats to properties on which we hold easements, to include, should all other measures fail, support for Federal acquisition." Assistant Interior Solicitor David A. Watts shared Connally's dim view of the permanent obligation incurred by easement acceptance. "In our view, this may not always be a healthy situation," he wrote Robert Utley. "Essentially, we fear that the National Park Service's overriding responsibilities may serve to weaken the commitment of state and local officials or members

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[54]Memorandum, Associate Director Ernest A. Connally to Assistant Secretary Nathaniel P. Reed, Aug. 31, 1973, Easement Program file, History Division; Connally interview.

of the private sector in a situation where a property may be declining." Philip O. Stewart, chief of the Service's land acquisition division, foresaw major funding and staffing requirements to support an easement program, which would involve extensive land title work, property inspections, and enforcement of easement terms. "The potential scope of such a program is enough to boggle the mind," he concluded.[55]

Pressed by Wheeler, the Service commissioned a study by preservation consultant Russell L. Brenneman. Brenneman presented his report, essentially supportive of landmark easements, to the Secretary's Advisory Board in April 1975. The board endorsed the easements concept in principle but, prompted by Service officials, recommended further study of additional cost and manpower requirements and deferral of an easements program until sufficient money and people were available to manage it.[56]

The Service moved deliberately, waiting until the fall to prepare a budget for the program. It requested from the department $356,237 for fiscal 1977, the start-up year, and $864,170 for full program implementation in fiscal 1978. As Service managers anticipated, these figures and the staff they would support were more than could be approved. More time passed, Douglas Wheeler left office with the change of administrations in January 1977, and the new administration had no comparable advocate of landmark easements. The proposed program was a dead letter.[57]

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[55]Memorandum, Connally to Wheeler, Dec. 26, 1973, Easement Program file; memorandum, Watts to Utley, Apr. 12, 1974, ibid.; memorandum, Stewart to Associate Director, Park System Management, May 9, 1974, ibid.

[56]Memorandum, Chairman Peter C. Murphy, Jr., to Secretary of the Interior, Apr. 25, 1975, in Minutes, 72d Advisory Board Meeting, Apr. 21-25, 1975; Connally interview.

[57]Memorandum, Director Gary Everhardt to Secretary of the Interior, Nov. 11, 1975, Easement Program file; Levy interview; Rogers interview.

The only pressures remaining were on behalf of Green Springs. Service officials were reluctant to accept even those easements, foreseeing trouble in the fact that only half the historic district would be so protected, with nonparticipating owners, holders of mining rights, and local officials opposed to federal involvement. On his last day in office, however, Assistant Secretary Nathaniel P. Reed (Wheeler's boss) announced Interior's intention to take the Green Springs easements after certain procedural requirements were met. The new administration of Secretary Cecil D. Andrus followed through and accepted easement donations from 38 owners covering some 7,000 acres in December 1977.[58]

During that year, Historic Green Springs sued Virginia Vermiculite, Ltd., the Farmers Home Administration, and the United Virginia Bank to prevent the Farmers Home Administration from guaranteeing a bank loan for mining operations in the district. It based its complaint on the failure of the Agriculture Department agency to comply with Section 106 of the National Historic Preservation Act on an action affecting National Register property. Virginia Vermiculite, supported by the Louisa County Board of Supervisors and nonparticipating landowners, filed a counterclaim, contending that the 1973 state nomination of Green Springs to the National Register was improper. The Interior Department conceded that the state had given inadequate notification of its nomination, rendering the original National Register listing defective. But Secretary Andrus affirmed the subsequent national historic landmark designation of Green Springs, which continued it on the Register. This caused the objecting

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[58]Rogers interview; letter, Reed to Elizabeth Nolting, Jan. 19, 1977, Historic Green Springs litigation file, Office of the Solicitor, Dept. of the Interior; Green Springs NHL file, History Division.

parties to attack the landmark designation on several grounds, including violation of due process under the Fifth Amendment.[59]

On August 11, 1980, Judge Robert R. Merhige, Jr., of the United States District Court in Richmond ruled the landmark designation invalid "based on the Department's failure to promulgate substantive standards for national historic significance and its failure to prepare and publish rules of procedure to govern the designation process." Although addressing only Green Springs, the decision clouded the legality of all prior landmarks. Sen. Henry M. Jackson, chairman of the Senate Energy and Natural Resources committee, wrote Secretary Andrus to express his concern and seek assistance in resolving the difficulty legislatively. The Interior solicitor's office and committee staff thereupon prepared a grandfather clause for insertion in a pending bill amending the National Historic Preservation Act:

> All historic properties listed in the Federal Register of February 6, 1979, as "National Historic Landmarks" or thereafter prior to the effective date of this Act are declared by Congress to be National Historic Landmarks of national historical significance as of their initial listing as such in the Federal Register for purposes of this Act and the Act of August 21, 1935 [the Historic Sites Act]....

Other provisions in the bill influenced by the Green Springs case directed the Interior secretary to publish detailed landmarks criteria and regulations and give adequate notice to local government officials and other affected parties. The bill was enacted on December 12 as the National Historic Preservation Act Amendments of 1980.[60] The landmarks program

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[59]Memorandum, Judge Robert R. Merhige, Jr., Aug. 11, 1980, in Historic Green Springs v. Bob Bergland et al., Civil Action 77-0230-R, U.S. District Court, Richmond, Va., copy in Historic Green Springs litigation file.

[60]Ibid., pp. 25-26; letter, Jackson to Andrus, Sept. 2, 1980, Historic Green Springs litigation file; letter Andrus to Jackson, Sept. 30,

had already begun to operate under new procedures addressing most of the judicial and legislative directives; the act led to further refinement of its regulations, published in 1983 (see appendix).

Previously, Green Springs had contributed to another provision of law. In considering a bill to prevent mining damage in the National Park System in 1975, Senator Jackson's committee voiced concern "not only with surface mining in areas which have been established as parts of the National Park System, but in other areas which have been recognized nationally for their unique natural or historical value.... Many of these landmarks, such as the historic Green Springs Plantation [sic] in Virginia, are on private land, however, and there is no protection available from surface mining activity...." The resulting Mining in the Parks Act of September 28, 1976, directed the Interior secretary to monitor landmarks for mining threats, notify the parties involved, and seek the advice of the Advisory Council on Historic Preservation on "alternative measures that may be taken by the United States to mitigate or abate such activity," presumably including federal acquisition of the lands or mining rights.[61] Landmarks thus obtained at least the possibility of additional protection.

Landmark Inspection and De-designation

To receive a landmark plaque, it was and is necessary for the owner of a property to agree to preserve the physical attributes contributing to its significance and to allow its periodic inspection by Park Service representatives. After 1971 even landmarks whose owners had not accepted

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1980, ibid.; P.L. 96-515, 94 Stat. 2988-89.

[61]S. Report 94-567, Dec. 16, 1975, p. 14; P.L. 94-429, 90 Stat. 1343-44.

plaques were to be inspected whenever possible, the rationale being that they now enjoyed review protection from federal undertakings under the National Historic Preservation Act and needed to be evaluated for continuing National Register eligibility.[62]

The initial plan was that the regional survey historians, who had been responsible for identifying the landmarks, would conduct the inspections biennially. The survey historians were unable to keep up with this workload, and in 1964 it was recognized that park superintendents and historians would have to assist. With the departure of most regional survey historians two years later, park staff were left with the entire reponsibility. A semantic change in the inspection program also dated from 1964: thereafter properties were to be "visited" rather than "inspected" because the latter term had "sometimes aroused unnecessary fears among site owners."[63]

Under either name, the activity was a weak link in the landmarks program. Many superintendents welcomed the public relations opportunity to visit landmarks in their vicinities and were capable of assessing and advising on present and potential problems affecting their integrity. Others found the additional duty burdensome or lacked the ability to adequately evaluate damage or threats to landmarks. Predictably, the results were mixed.

At a regional directors' meeting in 1975, the regional directors proposed and Director Gary Everhardt agreed to suspend landmark inspections

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[62]Memorandum, Acting Director Raymond L. Freeman to Field Directorate, Dec. 1, 1971, Landmark Program Procedures file.

[63]Minutes, 45th Advisory Board Meeting, Sept. 15-19, 1961; Minutes, Survey Historians' Meeting, Nov. 5-7, 1962, History Division; Minutes, Survey Historians' Meeting, Aug. 31-Sept. 1, 1964, ibid.

because of budget and personnel shortages. But an act of Congress the following year forced resumption and upgrading of the activity. Section 8 of the General Authorities Act of 1976 directed the Secretary of the Interior "to investigate, study, and continually monitor the welfare of areas whose resources exhibit qualities of national significance and which may have potential for inclusion in the National Park System." Among its specific provisions, it required the Secretary to submit annually to Congress "a complete and current list of...those areas of national significance listed on the National Register of Historic places which areas exhibit known or anticipated damage or threats to the integrity of their resources, along with notations as to the nature and severity of such damage or threats."[64]

Compilation of the Section 8 endangered landmark reports became the responsibility of the Heritage Conservation and Recreation Service when that bureau was established in 1978. Its regional offices assumed the inspection task; because their staffs were experienced in environmental review, most did a creditable job of identifying environmental threats to landmarks. Abolition of HCRS in 1981 and return of its preservation functions to the Park Service led to consolidation of their regional staffs and a strengthened inspection program supervised by the Preservation Assistance Division in Washington. In the Mid-Atlantic and North Atlantic regions of the Service, some park superintendents were again assigned to inspection duty. Elsewhere landmark specialists in the regional offices handled the task themselves or through contacts closer to the sites. Generally good results were achieved through clear guidance and

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[64]P.L. 94-458, Oct. 7, 1976, 90 Stat. 1940.

a landmark status report form issued by the Preservation Assistance Division.[65]

Under current procedure, landmarks are grouped into Priority I, those where damage is present or imminent; Priority II, those with a potential threat to their integrity; and Priority III, those apparently undamaged or unthreatened. Priority I landmarks are inspected each year and included in the annual Section 8 report. The 1983 report listed 42 such landmarks endangered by impending demolition, severe deterioration, severe erosion, vandalism, adverse uses, or imappropriate construction or alterations. Three formerly included landmarks were described as "irretrievably lost" since the 1982 report. On the positive side, nine others were cited as having been removed from danger.[66]

The landmarks program was designed with both carrot and stick incentives for the preservation of nationally significant properties. The carrot was the prestigious national designation by the Secretary of the Interior, manifested by the bronze plaque and certificate. The stick was the prospect of losing the designation, plaque, and certificate should the property be destroyed or unacceptably compromised.

The stick, it developed, was seldom employed. There was little hesitancy to de-designate landmark structures that had been demolished outright, as happened to the Big Four Building in Sacramento, California, in 1966; the Jacob Riis House in Queens, New York, in 1973; and the First

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[65]Interview with Jean Travers, June 13, 1984; "Procedures for Conducting the NHL Section 8 Review," Preservation Assistance Division, NPS.

[66]"1983 Report on Damaged and Threatened National Historic Landmarks and National Natural Landmarks," transmitted by letter, Secretary William P. Clark to Rep. Thomas P. O'Neill, Jr., Mar. 9, 1984, Preservation Assistance Division.

Telephone Exchange in New Haven, Connecticut, in 1973. The Holmes Site, an archeological site near La Plata, New Mexico, was deprived of landmark status in 1970 after being destroyed by pot hunters. But the program managers rarely acted on places that still existed in some form, however bereft of integrity, or whose historical basis for designation was known or discovered to be deficient. Owners would likely be offended, their congressmen might also become so, and the benefits gained would seldom exceed the trouble entailed.

The 1980 legislation amending the National Historic Preservation Act further deterred de-designation by its legal ratification of all landmarks named as of February 6, 1979, and thereafter to December 12, 1980. An Interior solicitor's opinion on this provision, reflected in the subsequent program regulations, allowed removal of landmark status from previously designated properties only for loss of integrity since designation; new information about or reassessment of their historical significance would not suffice. Earlier that year a landmark specialist in the National Register office had recommended de-designation of 22 sites, among them the Sergeant Floyd Monument, the First Pacific Coast Salmon Cannery Site, the McGuffey Boyhood Home Site, and the house George Walton had not occupied. As the new legislation was interpreted, no action could be taken on the mentioned properties even if public sentiment and politics were discounted. A committee of the Secretary's Advisory Board urged amendment of the act to allow "procedural error" and "staff error" as cause for de-designation of pre-1980 landmarks, but this recommendation was not pursued.[67]

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[67] 36 CFR §65.9, July 1, 1983; memorandum, Cecil McKithan to Carol Shull, June 26, 1980, Landmarks Program file, History Division; Minutes,

In recent practice, landmarks program staff have been reluctant to move against even demolished properties. The Reo Motor Car Company Plant in Lansing, Michigan, was destroyed in 1980, and the 1983 Section 8 report recorded the loss of the Edwin H. Armstrong House in Yonkers, New York; Springside, the Matthew Vassar estate in Poughkeepsie, New York; and Menokin, an eighteenth-century Lee family mansion in Richmond County, Virginia. Nothing remained of the Reo plant and the Armstrong house. Although Springside reputedly had surviving landscape features and Menokin retained part of a ruined wall, the destruction surely warranted removal of landmark status. But the new regulations complicated the process by requiring public notification, restudy of the properties, Advisory Board consideration, and secretarial action the same as for initial designation. Rather than spend staff time on this essentially negative activity, the program managers preferred to focus on creating new landmarks. In only one recent case was a property de-designated, and that only in part: a portion of the Ocean Drive Historic District in Newport, Rhode Island, was excised in 1984 after its owner was denied tax benefit certification for incompatible redevelopment there. The excision, supported by state and local authorities, was forced by the certification denial and did not represent a shift in the landmarks program priorities.[68]

Commercial Landmarks and Owner Consent

In 1976, through a contract with the American Association for State and Local History, the Historic Sites Survey embarked on a major study of properties in the Commerce and Industry theme. The multi-year study

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85th Advisory Board Meeting, Oct. 7-9, 1981.

[68]Travers interview; Levy interview.

identified numerous stores, office buildings, shops, and factories--many still in commercial or industrial use--as potential landmarks.[69]

Coincidentally, the Tax Reform Act of 1976 contained provisions designed to encourage preservation of such income-producing properties listed in the National Register of Historic Places. As an incentive to their rehabilitation, it allowed rapid depreciation or amortization of rehabilitation costs. To discourage their demolition, it forbade demolition costs to be treated as deductible business expenses and denied any form of accelerated depreciation for new structures built on their sites.[70]

With the latter provision, it was no longer possible to assure affected property owners that landmark designation or other National Register listing would not interfere with their present and future use or plans (assuming no federal involvement). Designation now carried a financial penalty for demolition. Not surprisingly, some owners objected. The chairman of Marshall Field and Company, whose Chicago store was among the nominees in August 1977, wrote, "[W]e simply cannot be put in a position where additional hurdles and competitive restraints may be placed in the path of upgrading and adapting the store to meet the needs of our customers and the changing demands of the central city." R. H. Macy, Montgomery Ward, Sears Roebuck, the American Stock Exchange, and others responded similarly to nominations of their historic properties.[71]

At its October meeting the Advisory Board found some 50 sites in the

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[69]AASLH Contract file, History Division.

[70]P.L. 94-455, Sec. 2124, Oct. 4, 1976.

[71]Letter, Joseph A. Burnham to George F. Emery, Aug. 15, 1977, with Consulting Committee Minutes, Aug. 19, 1977, History Division; Summary Minutes, Advisory Board History Areas Committee, Aug. 29, 1977, ibid.

theme--including those mentioned--to be nationally significant, but it asked that landmark designation of those whose owners objected be withheld pending a solicitor's opinion on the tax act implications. The opinion, rendered in March 1978, saw no legal problem with designation. "[W]e consider that the Secretary is authorized by law to designate National Historic Landmarks and list them on the National Register pursuant to appropriate procedures even if the owner objects and even in light of the consequences of...the Tax Reform Act of 1976," wrote Associate Solicitor James D. Webb. "Such action is not in violation of any constitutional or statutory limitation." The Advisory Board recommended accordingly in April, and Under Secretary James A. Joseph proceeded to designate 30 commercial properties that had been held in abeyance.[72]

In 1979 the American Association for State and Local History contract yielded 55 more sites in the Commerce and Industry theme. Among them was Proctor and Gamble's Ivorydale manufacturing plant near Cincinnati, Ohio. Proctor and Gamble's board chairman wrote Secretary Andrus in April to express concern about the effect of the tax act. "Also, we are concerned that the Congress, having once imposed restrictions on landmark owners, might impose other and perhaps more onerous restraints in the future...,"

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[72]Memorandum, Chairman Douglas W. Schwartz to Secretary of the Interior, Oct. 1, 1977, in Minutes, 77th Advisory Board Meeting, Sept. 30-Oct. 1, 1977; memorandum, Webb to Director, Heritage Conservation and Recreation Service, Mar. 30, 1978, NHL Procedures and Guidelines file, History Division; Minutes, 78th Advisory Board Meeting, Apr. 17-19, 1978; Memorandum, Joseph to Director, HCRS, June 2, 1978, NHL Procedures and Guidelines file.

Among the new landmarks was the Ford River Rouge plant in Dearborn, Michigan, much changed from its historic appearance but designated on the rationale that Henry Ford had intended it as a changing entity. This recognition of industrial process in the absence of tangible historic remains may suit the Historic American Engineering Record but not the landmarks program, in Jerry Rogers' view; he sees landmarks as things to be preserved. (Rogers interview.)

he added. "I would be derelict in my duty to the shareholders of this Company and to the Company's future management if I were to permit our Ivorydale property to be encumbered by restraints that do not encumber our competitors." Proctor and Gamble typified other objectors, already faced with federal health, safety, antipollution, and other requirements, who feared the demolition disincentives of the tax act less than the precedent they set for unknown entanglements later.[73]

With the landmarks program now under the Heritage Conservation and Recreation Service, a new consulting committee met under that bureau's auspices to consider the 55 sites. After hearing from opposing corporate representatives, it found all properties eligible. HCRS Associate Director Ernest Connally, believing that many of the commercial properties did not lend themselves to preservation and concerned about brewing political repercussions, advised Director Chris Delaporte to hold the committee recommendations, but Delaporte insisted on forwarding them to Secretary Andrus. Letters from Sen. John Glenn and other Ohio political figures supporting Proctor and Gamble also arrived on the Secretary's desk. The opposition triumphed when Rep. Willis D. Gradison, Jr., representing the district containing the Ivorydale plant, got Rep. Joseph McDade of Pennsylvania, ranking Republican on the House Interior appropriations subcommittee, to include a provision in the fiscal 1980 Interior appropriations bill "That none of the funds appropriated to the Heritage Conservation and Recreation Service may be used to add industrial facilities to the list of National Historic Landmarks without the consent of the owner." Reported by the full committee in July, the prohibition became law in

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[73]Letter, Edward G. Harness to Andrus, Apr. 3, 1979, Commerce and Industry Theme Study file, History Division; Connally interview.

November. Andrus declined to move in advance of its enactment, so that only those properties whose owners did not object became landmarks.[74]

The appropriations act provision was confirmed and strengthened in the National Historic Preservation Act Amendments of 1980, which extended owner consent to all National Register nominations of all private properties:

> The Secretary shall promulgate regulations requiring that before any property or district may be included on the National Register or designated as a National Historic Landmark, the owner or owners of such property, or a majority of the owners of the properties within the district in the case of an historic district, shall be given the opportunity (including a reasonable period of time) to concur in, or object to, the nomination of the property or district for such inclusion or designation. If the owner or owners of any privately owned property, or a majority of the owners of such properties within the district in the case of an historic district, object to such inclusion or designation, such property shall not be included on the National Register or designated as a National Historic Landmark until such objection is withdrawn.[75]

Because most Register nominations were initiated at the state level, the state historic preservation officers became responsible for notifying and obtaining the consent of most owners. Landmark nominations were initiated by the landmarks program staff (after the experiment with state submissions), however, and so it fell to them to handle owner notification in those cases. Notification proved especially cumbersome for historic districts with many owners, considerably complicating and slowing the nomination process.

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[74]Minutes, Consulting Committee on Potential National Historic Landmarks, Apr. 19-20, 1979, History Division; Connally interview; H. Report 96-374, July 23, 1979, p. 102; P.L. 96-126, Nov. 27, 1979, 93 Stat. 958.

The HCRS consulting committee was chaired by Robert Utley, then with the Advisory Council on Historic Preservation, and included Richard Howland of the Smithsonian and six more government employees from other agencies. This was its only meeting.

[75]P.L. 96-515, Sec. 201(a).

The law further provided that

> The Secretary shall review the nomination of the property or district where any such objection has been made and shall determine whether or not the property or district is eligible for [Register] inclusion or [landmark] designation, and if the Secretary determines that such property or district is eligible...he shall inform the Advisory Council on Historic Preservation, the appropriate State Historic Preservation Officer, the appropriate chief elected local official and the owner or owners of such property, of his determination.

This eligibility provision was designed to insure that properties kept off the Register by objecting owners would nevertheless be subject to the protection against federal undertakings afforded by Section 106, previously amended to apply to properties eligible for the Register as well as those actually listed.[76]

An Advisory Board committee on the landmarks program in 1981 urged full use of the "landmark-eligible" category where owners objected to designation. Despite the legal mandate and committee recommendation, however, no properties were forwarded to the Secretary under this provision. The landmarks staff, foreseeing trouble with owners and little gain from efforts not leading to designation, left the Proctor and Gamble and other opposed nominations on the shelf.[77]

After all the turmoil they had stirred, the disincentives in the tax code expired at the end of 1983, leaving owner consent as their legacy.[78]

The Program at Its Half-Century

As the 50th anniversary of the 1935 Historic Sites Act neared, it

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[76] Ibid.

[77] Minutes, 85th Advisory Board Meeting, Oct. 7-9, 1981; Levy interview.

[78] A 1984 tax code revision reinstated the denial of deductions for demolition costs but made it applicable to all buildings, so that historic structures were not singled out for special treatment.

appeared that national significance--once overshadowed by the "new preservation" underlying the 1966 Historic Preservation Act--was back in style.

The National Historic Preservation Act Amendments of 1980 gave national historic landmarks their first explicit recognition in law and prescribed regulations for their designation. Here Congress was motivated by owner and local government challenges to previous designations, especially the Green Springs case. But the law went on to afford landmarks a higher level of consideration than other National Register properties in federal project planning, requiring that agencies "shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm" to them. It also authorized direct grants to landmarks threatened with demolition or impairment.[79]

The landmarks program returned to the National Park Service in 1981 with minimal staffing and funding. Under Chief Historian Edwin Bearss and Benjamin Levy of the History Division, it made rapid strides with limited resources. The following year the Advisory Board expressed pleasure "to have such quality reports once again coming before it as the result of the recent reorganization" and urged continuation of the unfinished theme studies.[80] The staff was augmented by James Charleton, former assistant editor of the book series, and Carolyn Pitts, an architectural historian from the Historic American Buildings Survey. Historians Harry Butowsky and Laura Feller contributed to the program while performing

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[79]Levy interview; P.L. 96-515, Secs. 206, 201(a).

[80]Memorandum, Chairman Robin W. Winks to Secretary of the Interior, Mar. 13, 1982, in Minutes, 86th Advisory Board Meeting, Mar. 12-13, 1982. The Advisory Board and its History Areas Committee now served as the sole outside reviewers of landmark nominations, the separate consulting committee having been abolished for reasons of cost.

other duties. As of mid-1984 50 new landmarks had been designated, bringing the total to some 1600. Among the latest were such diverse properties as the Peavy-Haglin Experimental Concrete Grain Elevator in Minneapolis, Little Rock Central High School in Arkansas, U.S.S. Nautilus at Groton, Connecticut, the Whitney M. Young, Jr., Birthplace and Boyhood Home near Louisville, Kentucky, and the American Legation in Tangier, Morocco (the only landmark designated in a foreign country).[81]

Many of the new landmarks resulted from special studies pressed for by members of Congress and local interest groups. But the thematic approach favored by the professional staff and Advisory Board was revived as well. Theme studies got underway for sites associated with World War II in the Pacific, the space program, further aspects of historic architecture, and the history of recreation. The Service arranged for the Society for American Archeology and the American Society of Civil Engineers to identify more potential archeological and engineering landmarks. Enlisting the support of Chief Justice Warren E. Burger, Edwin Bearss advanced plans for a study of places important in constitutional history to commemorate the forthcoming bicentennial of the United States Constitution.

Other Park Service preservation programs responded to the renewed emphasis on national significance by turning their attention to national landmarks and parks. The Historic American Buildings Survey and Historic

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[81]Designation of the American Legation, technically on U.S. soil as a diplomatic installation, was initiated by State Department rather than landmarks program personnel. The Advisory Board recommended that the plaque be installed inside the building so as not to offend Moroccan sensibilities. Fort San Lorenzo in the Panama Canal Zone, among the first landmarks announced in 1960, was quietly dropped from listing after the U.S. relinquished control over the zone in 1978.

American Engineering Record gave increased prominence to park and landmark structures in their documentation work. Associate Director Jerry Rogers viewed landmark monitoring and safeguarding action by the Preservation Assistance Division as components of the landmarks program equal in importance to the identification and designation functions, and he pressed for more funding for these activities.[82]

Reviewing its preservation role beyond the parks, Rogers saw the Service as having taken "a major left turn" away from the traditional focus on national significance in 1967, when the Office of Archeology and Historic Preservation was formed and began to expand the National Register. The resulting infrastructure of state programs and other interests caring for locally significant properties, supported by federal tax policy and guided by Service standards, had raised state, local, and private preservation awareness and capability to such an extent that the Service could now pay more attention to its traditional focus.[83] For the national historic landmarks program, the signs were positive.

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[82]Rogers interview.

[83]Ibid.

A PROGRAM FOR ALL SEASONS

Although bureaucratic longevity is not always proof, the existence of the Historic Sites Survey and its offspring, the national historic landmarks program, over a half-century timespan suggests that they have served useful purposes. Not surprisingly, given shifting administration policies and objectives since the mid-1930s, those purposes have varied. To no small degree, the survival of the survey is attributable to its flexibility of purpose--its ability to support whatever the policy of the moment dictates.

In the beginning, when the National Park Service was seeking to augment its thematically imbalanced collection of historical areas with new and different kinds of parks, the survey was viewed chiefly as a means of identifying suitable additions to the National Park System. There was talk of using the survey results to assist state, local, and private preservation efforts, but such cooperative activity as followed was considered a by-product.

Resumption of the survey during Mission 66 was also justified as helping to round out the Park System with appropriate additions. The even greater volume of areas being proposed for the System during the 1950s heightened the value of the comparative theme study approach in disqualifying those that failed to measure up to System standards.

The granting of official public recognition--national historic landmark designation--to large numbers of sites outside the Park System beginning in 1960 significantly enlarged the value and purpose of the survey.

Landmark designation furthered the educational objective of the Historic Sites Act. It encouraged owners and interest groups to preserve and protect designated properties. And it offered the sponsors of some sites opposed by the Service a palatable alternative to Park System addition. With George Hartzog's reemphasis on building the System in the late 1960s and early 70s, landmark status was highlighted as a qualification for park establishment, linking the survey and landmarks program closely to the Service's expansionist policy.

Organizational changes in 1973 and 1978 progressively distanced the landmarks program from the Park System. With the tie all but broken under the Heritage Conservation and Recreation Service, the survey lost what had traditionally been its most important reason for being and nearly ceased to function. When it returned to the Park Service in 1981, the Service had reversed its posture on expanding the Park System, and there was little need or desire for an activity that served to identify potential additions. But converse purposes of the landmarks program could be argued for its increase: giving park petitioners an alternative, providing professional briefs against deficient park proposals, and encouraging private preservation. Again, under contrary circumstances, the value of the program was manifest.

Even under more favorable budgetary conditions, it is unlikely that the survey and landmarks program will ever attain their former magnitude. In terms of identification and designation, most of their legitimate mission has been accomplished. The most clearly outstanding places--the Mount Vernons and Monticellos--have been "landmarked," and national historical significance can only be stretched so far (one hopes). But history will go on, sites worthy of recognition will remain and appear, and battles

against the unworthy will need to be fought. As long as an official mechanism for assessing national historical significance is deemed useful, the national historic landmarks program will serve the future as well as the past.

APPENDIX

THE HISTORIC SITES ACT OF 1935

[PUBLIC—NO. 292—74TH CONGRESS]

[S. 2073]

AN ACT

To provide for the preservation of historic American sites, buildings, objects, and antiquities of national significance, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That it is hereby declared that it is a national policy to preserve for public use historic sites, buildings and objects of national significance for the inspiration and benefit of the people of the United States.

SEC. 2. The Secretary of the Interior (hereinafter referred to as the Secretary), through the National Park Service, for the purpose of effectuating the policy expressed in section 1 hereof, shall have the following powers and perform the following duties and functions:

(a) Secure, collate, and preserve drawings, plans, photographs, and other data of historic and archaeologic sites, buildings, and objects.

(b) Make a survey of historic and archaeologic sites, buildings, and objects for the purpose of determining which possess exceptional value as commemorating or illustrating the history of the United States.

(c) Make necessary investigations and researches in the United States relating to particular sites, buildings, or objects to obtain true and accurate historical and archaeological facts and information concerning the same.

(d) For the purpose of this Act, acquire in the name of the United States by gift, purchase, or otherwise any property, personal or real, or any interest or estate therein, title to any real property to be satisfactory to the Seoretary: *Provided*, That no such property which is owned by any religious or educational institution, or which is owned or administered for the benefit of the public shall be so acquired without the consent of the owner: *Provided further*, That no such property shall be acquired or contract or agreement for the acquisition thereof made which will obligate the general fund of the Treasury for the payment of such property, unless or until Congress has appropriated money which is available for that purpose.

(e) Contract and make cooperative agreements with States, municipal subdivisions, corporations, associations, or individuals, with proper bond where deemed advisable, to protect, preserve, maintain, or operate any historic or archaeologic building, site, object, or property used in connection therewith for public use, regardless as to whether the title thereto is in the United States: *Provided*, That no contract or cooperative agreement shall be made or entered into which will obligate the general fund of the Treasury unless or until Congress has appropriated money for such purpose.

(f) Restore, reconstruct, rehabilitate, preserve, and maintain historic or prehistoric sites, buildings, objects, and properties of national historical or archaeological significance and where deemed desirable establish and maintain museums in connection therewith.

(g) Erect and maintain tablets to mark or commemorate historic or prehistoric places and events of national historical or archaeological significance.

(h) Operate and manage historic and archaeologic sites, buildings, and properties acquired under the provisions of this Act together with lands and subordinate buildings for the benefit of the public, such authority to include the power to charge reasonable visitation fees and grant concessions, leases, or permits for the use of land, building space, roads, or trails when necessary or desirable either to accommodate the public or to facilitate administration: *Provided*, That such concessions, leases, or permits, shall be let at competitive bidding, to the person making the highest and best bid.

(i) When the Secretary determines that it would be administratively burdensome to restore, reconstruct, operate, or maintain any particular historic or archaeologic site, building, or property donated to the United States through the National Park Service, he may cause the same to be done by organizing a corporation for that purpose under the laws of the District of Columbia or any State.

(j) Develop an educational program and service for the purpose of making available to the public facts and information pertaining to American historic and archaeologic sites, buildings, and properties of national significance. Reasonable charges may be made for the dissemination of any such facts or information.

(k) Perform any and all acts, and make such rules and regulations not inconsistent with this Act as may be necessary and proper to carry out the provisions thereof. Any person violating any of the rules and regulations authorized by this Act shall be punished by a fine of not more than $500 and be adjudged to pay all cost of the proceedings.

SEC. 3. A general advisory board to be known as the "Advisory Board on National Parks, Historic Sites, Buildings, and Monuments" is hereby established, to be composed of not to exceed eleven persons, citizens of the United States, to include representatives competent in the fields of history, archaeology, architecture, and human geography, who shall be appointed by the Secretary and serve at his pleasure. The members of such board shall receive no salary but may be paid expenses incidental to travel when engaged in discharging their duties as such members.

It shall be the duty of such board to advise on any matters relating to national parks and to the administration of this Act submitted to it for consideration by the Secretary. It may also recommend policies to the Secretary from time to time pertaining to national parks and to the restoration, reconstruction, conservation, and general administration of historic and archaeologic sites, buildings, and properties.

SEC. 4. The Secretary, in administering this Act, is authorized to cooperate with and may seek and accept the assistance of any Federal, State, or municipal department or agency, or any educational or scientific institution, or any patriotic association, or any individual.

(b) When deemed necessary, technical advisory committees may be established to act in an advisory capacity in connection with the restoration or reconstruction of any historic or prehistoric building or structure.

(c) Such professional and technical assistance may be employed without regard to the civil-service laws, and such service may be established as may be required to accomplish the purposes of this Act and for which money may be appropriated by Congress or made available by gifts for such purpose.

SEC. 5. Nothing in this Act shall be held to deprive any State, or political subdivision thereof, of its civil and criminal jurisdiction in and over lands acquired by the United States under this Act.

SEC. 6. There is authorized to be appropriated for carrying out the purposes of this Act such sums as the Congress may from time to time determine.

SEC. 7. The provisions of this Act shall control if any of them are in conflict with any other Act or Acts relating to the same subject matter.

Approved, August 21, 1935.

NATIONAL HISTORIC PRESERVATION ACT
AMENDMENTS OF 1980--EXCERPTS

Public Law 96-515
96th Congress

An Act

To amend the National Historic Preservation Act of 1966, and for other purposes.

Dec. 12, 1980
[H.R. 5496]

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That this Act may be cited as the "National Historic Preservation Act Amendments of 1980".

National Historic Preservation Act Amendments of 1980.

TITLE II—HISTORIC PRESERVATION PROGRAM

National Register of Historic Places, expansion and maintenance. 16 USC 470a.

SEC. 201. (a) Section 101 of the National Historic Preservation Act is amended to read as follows:

"SEC. 101. (a)(1)(A) The Secretary of the Interior is authorized to expand and maintain a National Register of Historic Places composed of districts, sites, buildings, structures, and objects significant in American history, architecture, archeology, engineering, and culture.

National Historic Landmarks.

Publication in Federal Register. Submittal to congressional committees. *Ante,* p. 2987.

"(B) Properties meeting the criteria for National Historic Landmarks established pursuant to paragraph (2) shall be designated as 'National Historic Landmarks' and included on the National Register, subject to the requirements of paragraph (6). All historic properties included on the National Register on the date of the enactment of the National Historic Preservation Act Amendments of 1980 shall be deemed to be included on the National Register as of their initial listing for purposes of this Act. All historic properties listed in the Federal Register of February 6, 1979, as 'National Historic Landmarks' or thereafter prior to the effective date of this Act are declared by Congress to be National Historic Landmarks of national historic significance as of their initial listing as such in the Federal Register for purposes of this Act and the Act of August 21, 1935 (49 Stat. 666); except that in cases of National Historic Landmark districts for which no boundaries have been established, boundaries must first be published in the Federal Register and submitted to the Committee on Energy and Natural Resources of the United States Senate and to the Committee on Interior and Insular Affairs of the United States House of Representatives.

16 USC 450m.

Criteria and regulations.

"(2) The Secretary in consultation with national historical and archaeological associations, shall establish or revise criteria for properties to be included on the National Register and criteria for National Historic Landmarks, and shall also promulgate or revise regulations as may be necessary for—

"(A) nominating properties for inclusion in, and removal from, the National Register and the recommendation of properties by certified local governments;

"(B) designating properties as National Historic Landmarks and removing such designation;

"(C) considering appeals from such recommendations, nominations, removals, and designations (or any failure or refusal by a nominating authority to nominate or designate);

"(D) nominating historic properties for inclusion in the World Heritage List in accordance with the terms of the Convention concerning the Protection of the World Cultural and Natural Heritage;

"(E) making determinations of eligibility of properties for inclusion on the National Register; and

"(F) notifying the owner of a property, any appropriate local governments, and the general public, when the property is being considered for inclusion on the National Register, for designation as a National Historic Landmark or for nomination to the World Heritage List.

Regulations. Owner concurrence or objections.

"(6) The Secretary shall promulgate regulations requiring that before any property or district may be included on the National Register or designated as a National Historic Landmark, the owner or owners of such property, or a majority of the owners of the properties within the district in the case of an historic district, shall be given the opportunity (including a reasonable period of time) to concur in, or object to, the nomination of the property or district for such inclusion or designation. If the owner or owners of any privately owned property, or a majority of the owners of such properties within the district in the case of an historic district, object to such inclusion or designation, such property shall not be included on the National Register or designated as a National Historic Landmark until such objection is withdrawn. The Secretary shall review the nomination of the property or district where any such objection has been made and shall determine whether or not the property or district is eligible for such inclusion or designation, and if the Secretary determines that such property or district is eligible for such inclusion or designation, he shall inform the Advisory Council on Historic Preservation, the appropriate State Historic Preservation Officer, the appropriate chief elected local official and the owner or owners of such property, of his determination. The regulations under this paragraph shall include provisions to carry out the purposes of this paragraph in the case of multiple ownership of a single property.

Review.

Direct grants.

"(3)(A) In addition to the programs under paragraphs (1) and (2), the Secretary shall administer a program of direct grants for the preservation of properties included on the National Register. Funds to support such program annually shall not exceed 10 per centum of the amount appropriated annually for the fund established under section 108. These grants may be made by the Secretary, in consultation with the appropriate State Historic Preservation Officer—

16 USC 470h.

"(i) for the preservation of National Historic Landmarks which are threatened with demolition or impairment and for the preservation of historic properties of World Heritage significance,

"(f) Prior to the approval of any Federal undertaking which may directly and adversely affect any National Historic Landmark, the head of the responsible Federal agency shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark, and shall afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on the undertaking.

NATIONAL HISTORIC LANDMARKS PROGRAM REGULATIONS
INCLUDING CRITERIA OF NATIONAL SIGNIFICANCE

(From Code of Federal Regulations, Title 36, 1983)

PART 65—NATIONAL HISTORIC LANDMARKS PROGRAM

Sec.
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AUTHORITY: 16 U.S.C. 461 et seq., 16 U.S.C. 470 et seq.

SOURCE: 48 FR 4655, Feb. 2, 1983, unless otherwise noted.

§ 65.1 Purpose and authority.

The purpose of the National Historic Landmarks Program is to identify and designate National Historic Landmarks, and encourage the long range preservation of nationally significant properties that illustrate or commemorate the history and prehistory of the United States. These regulations set forth the criteria for establishing national significance and the procedures used by the Department of the Interior for conducting the National Historic Landmarks Program.

(a) In the Historic Sites Act of 1935 (45 Stat. 666, 16 U.S.C. 461 *et seq.*) the Congress declared that it is a national policy to preserve for public use historic sites, buildings and objects of national significance for the inspiration and benefit of the people of the United States and

(b) To implement the policy, the Act authorizes the Secretary of the Interior to perform the following duties and functions, among others:

(1) To make a survey of historic and archeological sites, buildings and objects for the purpose of determining which possess exceptional value as commemorating or illustrating the history of the United States;

(2) To make necessary investigations and researches in the United States relating to particular sites, buildings or objects to obtain true and accurate historical and archeological facts and information concerning the same; and

(3) To erect and maintain tablets to mark or commemorate historic or prehistoric places and events of national historical or archeological significance.

(c) The National Park Service (NPS) administers the National Historic Landmarks Program on behalf of the Secretary.

§ 65.2 Effects of designation.

(a) The purpose of the National Historic Landmarks Program is to focus attention on properties of exceptional value to the nation as a whole rather than to a particular State or locality. The program recognizes and promotes the preservation efforts of Federal, State and local agencies, as well as of private organizations and individuals and encourages the owners of landmark properties to observe preservation precepts.

(b) Properties designated as National Historic Landmarks are listed in the National Register of Historic Places upon designation as National Historic Landmarks. Listing of private property on the National Register does not prohbit under Federal law or regula-

tions any actions which may otherwise be taken by the property owner with respect to the property.

(c) Specific effects of designation are:

(1) The National Register was designed to be and is administered as a planning tool. Federal agencies undertaking a project having an effect on a listed or eligible property must provide the Advisory Council on Historic Preservation a reasonable opportunity to comment pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. The Advisory Council has adopted procedures concerning, *inter alia*, their commenting responsibility in 36 CFR Part 800.

(2) Section 110(f) of the National Historic Preservation Act of 1966, as amended, requires that before approval of any Federal undertaking which may directly and adversely affect any National Historic Landmark, the head of the responsible Federal agency shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark, and shall afford the Advisory Council a reasonable opportunity to comment on the undertaking.

(3) Listing in the National Register makes property owners eligible to be considered for Federal grants-in-aid and loan guarantees (when implemented) for historic preservation.

(4) If a property is listed in the National Register, certain special Federal income tax provisions may apply to the owners of the property pursuant to Section 2124 of the Tax Reform Act of 1976, the Economic Recovery Tax Act of 1981 and the Tax Treatment Extension Act of 1980.

(5) If a property contains surface coal resources and is listed in the National Register, certain provisions of the Surface Mining and Control Act of 1977 require consideration of a property's historic values in determining issuance of a surface coal mining permit.

(6) Section 8 of the National Park System General Authorities Act of 1970, as amended (90 Stat. 1940, 16 U.S.C. 1-5), directs the Secretary to prepare an annual report to Congress which identifies all National Historic Landmarks that exhibit known or anticipated damage or threats to the integrity of their resources. In addition, National Historic Landmarks may be studied by NPS for possible recommendation to Congress for inclusion in the National Park System.

(7) Section 9 of the Mining in the National Parks Act of 1976 (90 Stat. 1342, 16 U.S.C. 1980) directs the Secretary of the Interior to submit to the Advisory Council a report on any surface mining activity which the Secretary has determined may destroy a National Historic Landmark in whole or in part, and to request the advisory Council's advice on alternative measures to mitigate or abate such activity.

§ 65.3 Definitions.

As used in this rule:

(a) "Advisory Council" means the Advisory Council on Historic Preservation, established by the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470 *et seq.*). Address: Executive Director, Advisory Council on Historic Preservation, 1522 K Street NW, Washington, DC 20005.

(b) "Chief elected local official" means the mayor, county judge or otherwise titled chief elected administrative official who is the elected head of the local political jurisdiction in which the property is located.

(c) "Advisory Board" means the National Park System Advisory Board which is a body of authorities in several fields of knowledge appointed by the Secretary under authority of the Historic Sites Act of 1935, as amended.

(d) "Director" means Director, National Park Service.

(e) "District" means a geographically definable area, urban or rural, that possesses a significant concentration, linkage or continuity of sites, buildings, structures or objects united by past events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history.

(f) "Endangered property" means a historic property which is or is about to be subjected to a major impact that will destroy or seriously damage the resources which make it eligible for

National Historic Landmark designation.

(g) "Federal Preservation Officer" means the official designated by the head of each Federal agency responsible for coordinating that agency's activities under the National Historic Preservation Act of 1966, as amended, including nominating properties under that agency's ownership or control to the National Register.

(h) "Keeper" means the Keeper of the National Register of Historic Places.

(i) "Landmark" means National Historic Landmark and is a district, site, building, structure or object, in public or private ownership, judged by the Secretary to possess national significance in American history, archeology, architecture, engineering and culture, and so designated by him.

(j) "National Register" means the National Register of Historic Places, which is a register of districts, sites, buildings, structures and objects significant in American history, architecture, archeology, engineering and culture, maintained by the Secretary. (Section 2(b) of the Historic Sites Act of 1935 (49 Stat. 666, 16 U.S.C. 461) and Section 101(a)(1) of the National Historic Preservation Act of 1966 (80 Stat. 915; 16 U.S.C. 470), as amended.) (Address: Chief, Interagency Resource Management Division, 440 G Street NW, Washington, DC 20243.)

(k) "National Historic Landmarks Program" means the program which identifies, designates, recognizes, lists, and monitors National Historic Landmarks conducted by the Secretary through the National Park Service. (Address: Chief, History Division, National Park Service, Washington, DC 20240; addresses of other participating divisions found throughout these regulations.)

(l) "Object" means a material thing of functional, aesthetic, cultural, historical or scientific value that may be, by nature or design, movable yet related to a specific setting or environment.

(m) "Owner" or "owners" means those individuals, partnerships, corporations or public agencies holding fee simple title to property. "Owner" or "owners" does not include individuals, partnerships, corporations or public agencies holding easements or less than fee interests (including leaseholds) of any nature.

(n) "Property" means a site, building, object, structure or a collection of the above which form a district.

(o) "Secretary" means the Secretary of the Interior.

(p) "Site" means the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined or vanished, where the location itself maintains historical or archeological value regardless of the value of any existing structure.

(q) "State official" means the person who has been designated in each State to administer the State Historic Preservation Program.

(r) "Structure" means a work made by human beings and composed of interdependent and interrelated parts in a definite pattern of organization.

§ 65.4 National Historic Landmark Criteria.

The criteria applied to evaluate properties for possible designation as National Historic Landmarks or possible determination of eligibility for National Historic Landmark designation are listed below. These criteria shall be used by NPS in the preparation, review and evaluation of National Historic Landmark studies. They shall be used by the Advisory Board in reviewing National Historic Landmark studies and preparing recommendations to the Secretary. Properties shall be designated National Historic Landmarks only if they are nationally significant. Although assessments of national significance should reflect both public perceptions and professional judgments, the evaluations of properties being considered for landmark designation are undertaken by professionals, including historians, architectural historians, archeologists and anthropologists familiar with the broad range of the nation's resources and historical themes. The criteria applied by these specialists to potential landmarks do not define significance nor set a rigid standard for quality. Rather, the criteria establish the qualitative framework in which a com-

parative professional analysis of national significance can occur. The final decision on whether a property possesses national significance is made by the Secretary on the basis of documentation including the comments and recommendations of the public who participate in the designation process.

(a) Specific Criteria of National Significance: The quality of national significance is ascribed to districts, sites, buildings, structures and objects that possess exceptional value or quality in illustrating or interpreting the heritage of the United States in history, architecture, archeology, engineering and culture and that possess a high degree of integrity of location, design, setting, materials, workmanship, feeling and association, and:

(1) That are associated with events that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained; or

(2) That are associated importantly with the lives of persons nationally significant in the history of the United States; or

(3) That represent some great idea or ideal of the American people; or

(4) That embody the distinguishing characteristics of an architectural type specimen exceptionally valuable for a study of a period, style or method of construction, or that represent a significant, distinctive and exceptional entity whose components may lack individual distinction; or

(5) That are composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition but collectively compose an entity of exceptional historical or artistic significance, or outstandingly commemorate or illustrate a way of life or culture; or

(6) That have yielded or may be likely to yield information of major scientific importance by revealing new cultures, or by shedding light upon periods of occupation over large areas of the United States. Such sites are those which have yielded, or which may reasonably be expected to yield, data affecting theories, concepts and ideas to a major degree.

(b) Ordinarily, cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings and properties that have achieved significance within the past 50 years are not eligible for designation. Such properties, however, will qualify if they fall within the following categories:

(1) A religious property deriving its primary national significance from architectural or artistic distinction or historical importance; or

(2) A building or structure removed from its original location but which is nationally significant primarily for its architectural merit, or for association with persons or events of transcendent importance in the nation's history and the association consequential; or

(3) A site of a building or structure no longer standing but the person or event associated with it is of transcendent importance in the nation's history and the association consequential; or

(4) A birthplace, grave or burial if it is of a historical figure of transcendent national significance and no other appropriate site, building or structure directly associated with the productive life of that person exists; or

(5) A cemetery that derives its primary national significance from graves of persons of transcendent importance, or from an exceptionally distinctive design or from an exceptionally significant event; or

(6) A reconstructed building or ensemble of buildings of extraordinary national significance when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other buildings or structures with the same association have survived; or

(7) A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own national historical significance; or

(8) A property achieving national significance within the past 50 years if it is of extraordinary national importance.

§ 65.5 Designation of National Historic Landmarks.

Potential National Historic Landmarks are identified primarily by means of theme studies and in some instances by special studies. Nominations and recommendations made by the appropriate State officials, Federal Preservation Officers and other interested parties will be considered in scheduling and conducting studies.

(a) *Theme studies.* NPS defines and systematically conducts organized theme studies which encompass the major aspects of American history. The theme studies provide a contextual framework to evaluate the relative significance of historic properties and determine which properties meet National Historic Landmark criteria. Theme studies will be announced in advance through direct notice to appropriate State officials, Federal Preservation Officers and other interested parties and by notice in the FEDERAL REGISTER. Within the established thematic framework, NPS will schedule and conduct National Historic Landmark theme studies according to the following priorities. Themes which meet more of these priorities ordinarily will be studied before those which meet fewer of the priorities:

(1) Theme studies not yet begun as identified in "History and Prehistory in the National Park System," 1982.

(2) Theme studies in serious need of revision.

(3) Theme studies which relate to a significant number of properties listed in the National Register bearing opinions of State Historic Preservation Officers and Federal Preservation Officers that such properties are of potential national significance. (Only those recommendations which NPS determines are likely to meet the landmarks criteria will be enumerated in determining whether a significant number exists in a theme study.)

(4) Themes which reflect the broad planning needs of NPS and other Federal agencies and for which the funds to conduct the study are made available from sources other than the regularly programmed funds of the National Historic Landmarks Program.

(b) *Special Studies.* NPS will conduct special studies for historic properties outside of active theme studies according to the following priorities:

(1) Studies authorized by Congress or mandated by Executive Order will receive the highest priority.

(2) Properties which NPS determines are endangered and potentially meet the National Historic Landmarks criteria, whether or not the theme in which they are significant has been studied.

(3) Properties listed in the National Register bearing State or Federal agency recommendations of potential national significance where NPS concurs in the evaluation and the property is significant in a theme already studied.

(c)(1) When a property is selected for study to determine its potential for designation as a National Historic Landmark, NPS will notify in writing, except as provided below, (i) the owner(s), (ii) the chief elected local official, (iii) the appropriate State official, (iv) the Members of Congress who represent the district and State in which the property is located, and, (v) if the property is on an Indian reservation, the chief executive officer of the Indian tribe, that it will be studied to determine its potential for designation as a National Historic Landmark. This notice will provide information on the National Historic Landmarks Program, the designation process and the effects of designation.

(2) When the property has more than 50 owners, NPS will notify in writing (i) the chief elected local official, (ii) the appropriate State official, (iii) the Members of Congress who represent the district and State in which the property is located, and, (iv) if the property is on an Indian reservation, the chief executive officer of the Indian tribe, and (v) provide general notice to the property owners. This general notice will be published in one or more local newspapers of general circulation in the area in which the potential National Historic Landmark is located and will provide information on the National Historic Landmarks

Program, the designation process and the effects of designation. The researcher will visit each property selected for study unless it is determined that an onsite investigation is not necessary. In the case of districts with more than 50 owners NPS may conduct a public information meeting if widespread public interest so warrants or on request by the chief elected local official.

(3) Properties for which a study was conducted before the effective date of these regulations are not subject to the requirements of paragraphs (c) (1) and (2) of this section.

(4) The results of each study will be incorporated into a report which will contain at least

(i) A precise description of the property studied; and

(ii) An analysis of the significance of the property and its relationship to the National Historic Landmark criteria.

(d)(1) Properties appearing to qualify for designation as National Historic Landmarks will be presented to the Advisory Board for evaluation except as specified in paragraph (h) of this section.

(2) Before the Advisory Board's review of a property, NPS will provide written notice of this review, except as provided below, and a copy of the study report to (i) the owner(s) of record; (ii) the appropriate State official; (iii) the chief elected local official; (iv) the Members of Congress who represent the district and State in which the property is located; and, (v) if the property is located on an Indian reservation, the chief executive officer of the Indian tribe. The list of owners shall be obtained from official land or tax record, whichever is most appropriate, within 90 days prior to the notification of intent to submit to the Advisory Board. If in any State the land or tax record is not the appropriate list an alternative source of owners may be used. NPS is responsible for notifying only those owners whose names appear on the list. Where there is more than one owner on the list each separate owner shall be notified.

(3) In the case of a property with more than 50 owners, NPS will notify, in writing, (i) the appropriate State official; (ii) the chief elected local official; (iii) the Members of Congress who represent the district and State in which the property is located; (iv) if the property is located on an Indian reservation, the chief executive officer of the Indian tribe; and, (v) will provide general notice to the property owners. The general notice will be published in one or more local newspapers of general circulation in the area in which the property is located. A copy of the study report will be made available on request. Notice of Advisory Board review will also be published in the FEDERAL REGISTER.

(4) Notice of Advisory Board review will be given at least 60 days in advance of the Advisory Board meeting. The notice will state date, time and location of the meeting; solicit written comments and recommendations on the study report; provide information on the National Historic Landmarks Program, the designation process and the effects of designation and provide the owners of private property not more than 60 days in which to concur in or object in writing to the designation. Notice of Advisory Board meetings and the agenda will also be published in the FEDERAL REGISTER. Interested parties are encouraged to submit written comments and recommendations which will be presented to the Advisory Board. Interested parties may also attend the Advisory Board meeting and upon request will be given an opportunity to address the Board concerning a property's significance, integrity and proposed boundaries.

(5) Upon notification, any owner of private property who wishes to object shall submit to the Chief, History Division, a notarized statement that the party is the sole or partial owner of record of the property, as appropriate, and objects to the designations. Such notice shall be submitted during the 60-day commenting period. Upon receipt of notarized objections respecting a district or an individual property with multiple ownership it is the responsibility of NPS to ascertain whether a majority of owners have so objected. If an owner whose name did not appear on the list certifies in a written notarized statement that the

party is the sole or partial owner of a nominated private property such owner shall be counted by NPS in determining whether a majority of owners has objected. Each owner of private property in a district has one vote regardless of how many properties or what part of one property that party owns and regardless of whether the property contributes to the significance of the district.

(6) The commenting period following notification can be waived only when all property owners and the chief elected local official have agreed in writing to the waiver.

(e)(1) The Advisory Board evalutes such factors as a property's significance, integrity, proposed boundaries and the professional adequancy of the study. If the Board finds that these conditions are met, it may recommend to the Secretary that a property be designated or declared eligible for designation as a National Historic Landmark. If one or more of the conditions are not met, the Board may recommend that the property not be designated a landmark or that consideration of it be deferred for further study, as appropriate. In making its recommendation, the Board shall state, if possible, whether or not it finds that the criteria of the landmarks program have been met. A simple majority is required to make a recommendation of designation. The Board's recommendations are advisory.

(2) Studies submitted to the Advisory Board (or the Consulting Committee previously under the Heritage Conservation and Recreation Service) before the effective date of these regulations need not be resubmitted to the Advisory Board. In such instances, if a property appears to qualify for designation, NPS will provide notice and a copy of the study report to the parties as specified in paragraphs (d)(2) and (3) of this section and will provide at least 30 days in which to submit written comments and to provide an opportunity for owners to concur in or object to the designation.

(3) The Director reviews the study report and the Advisory Board recommendations, certifies that the procedural requirements set forth in this section have been met and transmits the study reports, the recommendations of the Advisory Board, his recommendations and any other recommendations and comments received pertaining to the properties to the Secretary.

(f) The Secretary reviews the nominations, recommendations and any comments and, based on the criteria set forth herein, makes a decision on National Historic Landmark designation. Properties that are designated National Historic Landmarks are entered in the National Register of Historic Places, if not already so listed.

(1) If the private owner or, with respect to districts or individual properties with multiple ownership, the majority of such owners have objected to the designation by notarized statements, the Secretary shall not make a National Historic Landmark designation but shall review the nomination and make a determination of its eligibility for National Historic Landmark designation.

(2) The Secretary may thereafter designate such properties as National Historic Landmarks only upon receipt of notarized statements from the private owner (or majority of private owners in the event of a district or a single property with multiple ownership) that they do not object to the designation.

(3) The Keeper may list in the National Register properties considered for National Historic Landmark designation which do not meet the National Historic Landmark criteria but which do meet the National Register criteria for evaluation in 36 CFR Part 60 or determine such properties eligible for the National Register if the private owners or majority of such owners in the case of districts object to designation. A property determined eligible for National Historic Landmark designation is determined eligible for the National Register.

(g) Notice of National Historic Landmark designation, National Register listing, or a determination of eligibility will be sent in the same manner as specified in paragraphs (d)(2) and (3) of this section. For properties which are determined eligible the Advisory Council will also be notified. Notice

will be published in the FEDERAL REGISTER.

(h)(1) The Secretary may designate a National Historic Landmark without Advisory Board review through accelerated procedures described in this section when necessary to assist in the preservation of a nationally significant property endangered by a threat of imminent damage or destruction.

(2) NPS will conduct the study and prepare a study report as described in paragraph (c)(4) of this section.

(3) If a property appears to qualify for designation, the National Park Service will provide notice and a copy of the study report to the parties specified in paragraphs (d)(2) and (3) and will allow at least 30 days for the submittal of written comments and to provide owners of private property an opportunity to concur in or object to designation as provided in paragraph (d)(5) of this section except that the commenting period may be less than 60 days.

(4) The Director will review the study report and any comments, will certify that procedural requirements have been met, and will transmit the study report, his and any other recommendations and comments pertaining to the property to the Secretary.

(5) The Secretary will review the nomination and recommendations and any comments and, based on the criteria set forth herein, make a decision on National Historic Landmark designation or a determination of eligibility for designation if the private owners or a majority of such owners of historic districts object.

(6) Notice of National Historic Landmark designation or a determination of eligibility will be sent to the same parties specified in paragraphs (d)(2) and (3) of this section.

§ 65.6 Recognition of National Historic Landmarks.

(a) Following designation of a property by the Secretary as a National Historic Landmark, the owner(s) will receive a certificate of designation. In the case of a district, the certificate will be delivered to the chief elected local official or other local official, or to the chief officer of a private organization involved with the preservation of the district, or the chief officer of an organization representing the owners of the district, as appropriate.

(b) NPS will invite the owner of each designated National Historic Landmark to accept, free of charge, a landmark plaque. In the case of a district, the chief elected local official or other local official, or the chief officer of an organization involved in the preservation of the district, or chief officer of an organization representing the owners of the district, as appropriate, may accept the plaque on behalf of the owners. A plaque will be presented to properties where the appropriate recipient(s) (from those listed above) agrees to display it publicly and appropriately.

(c) The appropriate recipient(s) may accept the plaque at any time after designation of the National Historic Landmark. In so doing owners give up none of the rights and privileges of ownership or use of the landmark property nor does the Department of the Interior acquire any interest in property so designated.

(d) NPS will provide one standard certificate and plaque for each designated National Historic Landmark. The certificate and plaque remain the property of NPS. Should the National Historic Landmark designation at any time be withdrawn, in accordance with the procedures specified in § 65.9 of these rules, or should the certificate and plaque not be publicly or appropriately displayed, the certificate and the plaque, if issued, will be reclaimed by NPS.

(e) Upon request, and if feasible, NPS will help arrange and participate in a presentation ceremony.

§ 65.7 Monitoring National Historic Landmarks.

(a) NPS maintains a continuing relationship with the owners of National Historic Landmarks. Periodic visits, contacts with State Historic Preservation Officers, and other appropriate means will be used to determine whether landmarks retain their integrity, to advise owners concerning accepted preservation standards and techniques and to update administrative records on the properties.

(b) Reports of monitoring activities form the basis for the annual report submitted to Congress by the Secretary of the Interior, as mandated by Section 8, National Park System General Authorities Act of 1970, as amended (90 Stat. 1940, 16 U.S.C. 1a-5). The Secretary's annual report will identify those National Historic Landmarks which exhibit known or anticipated damage or threats to their integrity. In evaluating National Historic Landmarks for listing in the report, the seriousness and imminence of the damage or threat are considered, as well as the integrity of the landmark at the time of designation taking into account the criteria in Section 65.4.

(c) As mandated in Section 9, Mining in the National Parks Act of 1976 (90 Stat. 1342, 16 U.S.C. 1980), whenever the Secretary of the Interior finds that a National Historic Landmark may be irreparably lost or destroyed in whole or in part by any surface mining activity, including exploration for, removal or production of minerals or materials, the Secretary shall (1) notify the person conducting such activity of that finding;

(2) Submit a report thereon, including the basis for his finding that such activity may cause irreparable loss or destruction of a National Historic Landmark, to the Advisory Council; and

(3) Request from the Council advice as to alternative measures that may be taken by the United States to mitigate or abate such activity.

(d) Monitoring activities described in this section, including the preparation of the mandated reports to Congress and the Advisory Council are carried out by NPS regional offices under the direction of the Preservation Assistance Division, NPS [Address: Chief, Resource Assistance Division, National Park Service, 440 G Street NW, Washington, DC 20243] in consultation with the History Division, NPS.

§ 65.8 Alteration of National Historic Landmark boundaries.

(a) *Two justifications exist for enlarging the boundary of a National Historic Landmark:* Documentation of previously unrecognized significance or professional error in the original designation. Enlargement of a boundary will be approved only when the area proposed for addition to the National Historic Landmark possesses or contributes directly to the characteristics for which the landmark was designated.

(b) *Two justifications exist for reducing the boundary of a National Historic Landmark:* Loss of integrity or professional error in the original designation. Reduction of a boundary will be approved only when the area to be deleted from the National Historic Landmark does not possess or has lost the characteristics for which the landmark was designated.

(c) A proposal for enlargement or reduction of a National Historic Landmark boundary may be submitted to or can originate with the History Division, NPS. NPS may restudy the National Historic Landmark and subsequently make a proposal, if appropriate, in the same manner as specified in § 65.5 (c) through (h). In the case of boundary enlargements only those owners in the newly nominated but as yet undesignated area will be notified and will be counted in determining whether a majority of private owners object to listing.

(d)(1) When a boundary is proposed for a National Historic Landmark for which no specific boundary was identified at the time of designation, NPS shall provide notice, in writing, of the proposed boundary to (i) the owner(s); (ii) the appropriate State official; (iii) the chief elected local official; (iv) the Members of Congress who represent the district and State in which the landmark is located, and (v) if the property is located on an Indian reservation, the chief executive officer of the Indian tribe, and shall allow not less than 30 nor more than 60 days for submitting written comments on the proposal. In the case of a landmark with more than 50 owners, the general notice specified in § 65.5(d)(3) will be used. In the case of National Historic Landmark districts for which no boundaries have been established, proposed boundaries shall be published in the FEDERAL REGISTER for comment and be submitted to the Committee on Energy and Natural Resources of the United States Senate and to the Com-

mittee on Interior and Insular Affairs of the United States House of Representatives and not less than 30 nor more than 60 days shall be provided for the submittal of written comments on the proposed boundaries.

(2) The proposed boundary and any comments received thereon shall be submitted to the Associated Director for National Register Programs, NPS, who may approve the boundary without reference to the Advisory Board or the Secretary.

(3) NPS will provide written notice of the approved boundary to the same parties specified in paragraph (d)(1) of this section and by publication in the FEDERAL REGISTER.

(4) Management of the activities described in paragraphs (d)(1), (2), and (3) of this section is handled by the National Register of Historic Places, NPS, [Address: National Register of Historic Places, National Park Service, Department of the Interior, Washington, DC 20240].

(e) A technical correction to a boundary may be approved by the Chief, History Division, without Advisory Board review or Secretarial approval. NPS will provide notice, in writing, of any technical correction in a boundary to the same parties specified in (d)(1).

§ 65.9 Withdrawal of National Historic Landmark designation.

(a) National Historic Landmarks will be considered for withdrawal of designation only at the request of the owner or upon the initiative of the Secretary.

(b) Four justifications exist for the withdrawal of National Historic Landmark designation:

(1) The property has ceased to meet the criteria for designation because the qualities which caused it to be originally designated have been lost or destroyed, or such qualities were lost subsequent to nomination, but before designation;

(2) Additional information shows conclusively that the property does not possess sufficient significance to meet the National Historic Landmark criteria;

(3) Professional error in the designation; and

(4) Prejudicial procedural error in the designation process.

(c) Properties designated as National Historic Landmarks before December 13, 1980, can be dedesignated only on the grounds established in paragraph (a)(1) of this section.

(d) The owner may appeal to have a property dedesignated by submitting a request for dedesignation and stating the grounds for the appeal as established in subsection (a) to the Chief, History Division, National Park Service, Department of the Interior, Washington, DC 20240. An appellant will receive a response within 60 days as to whether NPS considers the documentation sufficient to initiate a restudy of the landmark.

(e) The Secretary may initiate a restudy of a National Historic Landmark and subsequently a proposal for withdrawal of the landmark designation as appropriate in the same manner as a new designation as specified in § 65.5 (c) through (h). Proposals will not be submitted to the Advisory Board if the grounds for removal are procedural, although the Board will be informed of such proposals.

(f)(1) The property will remain listed in the National Register if the Keeper determines that it meets the National Register criteria for evalution in 36 CFR 60.4, except if the property is redesignated on procedural grounds.

(2) Any property from which designation is withdrawn because of a procedural error in the designation process shall automatically be considered eligible for inclusion in the National Register as a National Historic Landmark without further action and will be published as such in the FEDERAL REGISTER.

(g)(1) The National Park Service will provide written notice of the withdrawal of a National Historic Landmark designation and the status of the National Register listing, and a copy of the report on which those actions are based to (i) the owner(s); (ii) the appropriate State official; (iii) the chief elected local official; (iv) the Members of Congress who represent the district and State in which the landmark is located; and (v) if the landmark is located on an Indian res-

ervation, the chief executive officer of the Indian tribe. In the case of a landmark with more than 50 owners, the general notice specified in § 65.5(d)(3) will be used.

(2) Notice of withdrawal of designation and related National Register listing and determinations of eligibility will be published periodically in the FEDERAL REGISTER.

(h) Upon withdrawal of a National Historic Landmark designation, NPS will reclaim the certificate and plaque, if any, issued for that landmark.

(i) An owner shall not be considered as having exhausted administrative remedies with respect to dedesignation of a National Historic Landmark until after submitting an appeal and receiving a response from NPS in accord with these procedures.

§ 65.10 Appeals for designation.

(a) Any applicant seeking to have a property designated a National Historic Landmark may appeal, stating the grounds for appeal, directly to the Director, National Park Service, Department of the Interior, Washington, DC 20240, under the following circumstances:

Where the applicant—

(1) Disagrees with the initial decision of NPS that the property is not likely to meet the criteria of the National Historic Landmarks Program and will not be submitted to the Advisory Board; or

(2) Disagrees with the decision of the Secretary that the property does not meet the criteria of the National Historic Landmarks Program.

(b) The Director will respond to the appellant within 60 days. After reviewing the appeal the Director may: (1) deny the appeal;

(2) Direct that a National Historic Landmark nomination be prepared and processed according to the regulations if this has not yet occurred; or

(3) Resubmit the nomination to the Secretary for reconsideration and final decision.

(c) Any person or organization which supports or opposes the consideration of a property for National Historic Landmark designation may submit an appeal to the Director, NPS, during the designation process either supporting or opposing the designation. Such appeals received by the Director before the study of the property or before its submission to the National Park System Advisory Board will be considered by the Director, the Advisory Board and the Secretary, as appropriate, in the designation process.

(d) No person shall be considered to have exhausted administrative remedies with respect to failure to designate a property a National Historic Landmark until he or she has complied with the procedures set forth in this section.

IN REPLY REFER TO:
L58-IBH

UNITED STATES
DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
WASHINGTON 25, D. C.

JUN 30 1959

Memorandum

To: Secretary of the Interior

From: Director, National Park Service

Subject: National Survey of Historic Sites and Buildings

Problem: To utilize most effectively the results of the National Survey of Historic Sites and Buildings.

Background and Discussion: The Historic Sites Act of August 21, 1935 (49 Stat. 666) directs the Secretary of the Interior to "make a survey of historic and archeologic sites, buildings, and objects for the purpose of determining which possess exceptional value as commemorating or illustrating the history of the United States."

To carry out this Congressional mandate, the National Survey of Historic Sites and Buildings was initiated in 1935. Substantial progress had been made in the survey when it was suspended at the outbreak of World War II. The product of this partially finished survey was a series of reports and a list of sites classified as of exceptional value by the Advisory Board on National Parks, Historic Sites, Buildings, and Monuments. So far as coverage was complete, the survey supplied historical data for:

1. Selection of additions to the National Park System.

2. Rejection of proposed areas that did not meet the criteria.

3. Presidential proclamations, National Historic Sites designations, Departmental reports on proposed legislation, replies to Presidential and Congressional inquiries, and replies to private and semi-public requests regarding the preservation of historic sites and buildings.

4. Advising the General Services Administration as required by law on the disposition of Government surplus property,

such as historic forts and military posts.

5. Assisting the Department of the Army, the Bureau of Reclamation, the Corps of Engineers, and the Office of Territories in matters affecting the preservation of the American heritage in historic sites, buildings, and archeological resources.

The extensive reports and the classified list of sites and buildings of exceptional value were not made public. Much invaluable material has languished in the Government files, unused. Consequently, the full effective value of the survey for State agencies, regional historical organizations, and semi-public preservation groups and for the Nation as a whole was not realized.

As part of the MISSION 66 program, we are now in the early stages of the renewed Survey of Historic Sites and Buildings. The survey is conducted in a scholarly manner, approved by the Advisory Board on National Parks, Historic Sites, Buildings, and Monuments. For purposes of this survey, our history has been divided into 21 themes or phases, such as English Colonization, the American Revolution, Westward Expansion, and the Civil War. Three or four of these 21 studies are being completed each year, and it is planned to submit each to you as it is finished.

With the help of the Advisory Board, criteria for the survey have been developed (see Appendix A attached), and several theme studies have been completed which are being submitted to you under separate memoranda.

We make the following recommendations:

1. That in order fully to utilize the results of the survey for the public benefit, there be created a category of historic sites and buildings under the Historic Sites Act to be known as Registered National Historic Landmarks. The owner of any site or building determined as a result of the survey "to possess exceptional value" would be issued a certificate by the Secretary of the Interior attesting to its importance, upon application and agreement to certain simple conditions.

The only cost to the Federal Government would be that of issuing and administering the certificate system. Sites awarded certificates would not come into Federal jurisdiction and would not be considered units of the National Park System. The vast majority of sites found by the survey to possess "exceptional value" would be placed in this category of Registered National Historic Landmarks.

The issuance of certificates in this manner will encourage preservation. It will supply historic data helpful to the National Trust, State authorities, and historical and patriotic organizations. It will provide an official and impartial basis for averting encroachments and other indiscriminate threats to preservation.

2. That the small number of historic sites and buildings found by the survey to possess superlative national importance and which are not adequately protected, or which are already in Federal ownership, be recommended for addition, when timely, to the National Park System as National Historic Sites. For inclusion in the National Park System such sites would also have to meet criteria of suitability and feasibility for park purposes, and be needed to fill gaps in the National Park System.

3. That this plan for utilizing the results of the survey for the public benefit, together with several sample theme studies, be transmitted to the Bureau of the Budget and the Congressional Committees on Interior and Insular Affairs as soon as they can be made ready, and that such meetings be arranged for discussion of these plans as may be necessary. This is recommended in order that the views of those bodies may be secured while the survey is still in its relatively early stages. It is also recommended that the same material be transmitted simultaneously to the National Trust for Historic Preservation in accordance with the cooperative agreement between that organization and the Department.

4. That a press release be issued when the above material is transmitted to the Congress, and that copies of the supporting studies be made available at that time for examination by the press. Thereafter, if this plan meets with a favorable response, it is recommended that the results of the survey of each historic phase or period be made available to the public as soon as they have been acted upon by the Service, the Advisory Board, and the Department rather than wait until all parts are completed several years hence.

The Advisory Board on National Parks, Historic Sites, Buildings, and Monuments at its meeting, April 20-22, 1959, considered and approved an earlier draft of this memorandum with which this is consistent, although this memorandum carries the

earlier concept of certified historic sites one step further to give the name Registered National Historic Landmark.

Conrad L. Wirth
Director

Attachment

Approved in Principle: NOV 19 1959

Fred A. Seaton
Secretary of the Interior

SURVEY THEMES

The first theme structure, adopted in 1936:

Historical Themes

Colonial Period of American History

I. European Background and Discovery
II. Spanish Exploration and Settlement
III. Russian Colonization
IV. The Establishment of the French Colonies
V. The Dutch and Swedish Settlements
VI. English Exploration and Colonization
VII. The Development of the English Colonies to 1763

Period from 1783-1830

VIII. The Preliminaries of the Revolution
IX. The War for American Independence
X. Domestic Affairs from 1789-1830
XI. Foreign Affairs from 1789-1830
XII. The Advance of the Frontier
XIII. Commerce, Industry, and Agriculture
XIV. Architecture and Literature

Pattern of American History, 1830-1936

XV. Relations of the White Man with the Indians
XVI. Westward Expansion and the Extension of National Boundaries
XVII. Means of Travel and Communication
XVIII. Exploitation of Natural Resources
XIX. Industrial Development
XX. Political Events and Leaders
XXI. Military Events and Leaders
XXII. Human Relations
XXIII. The Arts and Sciences

Archeological Culture Groupings

I. Southwestern National Monuments
II. Upper Mississippi Valley Cultures
III. Middle Mississippi Valley Cultures
IV. Lower Mississippi Valley Cultures
V. Southeastern Cultures
VI. Tennessee Valley Cultures
VII. Ohio Valley Cultures

VIII. Northeastern Cultures
IX. Northern Plains Cultures
X. The Arctic Cultures
XI. Gulf Coast and Peninsula Cultures
XIII. Sites not included in preceding groups

The current theme structure, adopted in 1970:

I. The Original Inhabitants

A. The Earliest Americans
B. Native Villages and Communities
C. Indian Meets European
D. Contemporary Native Cultures
E. Native Cultures of the Pacific
F. Aboriginal Technology

II. European Exploration and Settlement

A. Spanish Exploration and Settlement
B. French Exploration and Settlement
C. English Exploration and Settlement
D. Other European Exploration and Settlement

III. Development of the English Colonies, 1700-1775

IV. Major American Wars

A. The American Revolution
B. The War of 1812
C. The Mexican War
D. The Civil War
E. The Spanish-American War
F. World War I
G. World War II

V. Political and Military Affairs

A. Political and Military Affairs, 1783-1830
B. Political and Military Affairs, 1830-1860
C. Political and Military Affairs, 1865-1914
D. Political and Military Affairs after 1914
E. The American Presidency

VI. Westward Expansion, 1783-1898

A. Great Explorers of the West
B. The Fur Trade
C. Military-Indian Conflicts
D. Western Trails and Travelers

E. The Mining Frontier
F. The Farmers' Frontier
G. The Cattlemen's Empire

VII. America At Work

A. Agriculture
B. Commerce and Industry
C. Science and Invention
D. Transportation and Communication
E. Architecture
F. Engineering

VIII. The Contemplative Society

A. Literature, Drama, and Music
B. Painting and Sculpture
C. Education
D. Intellectual Currents

IX. Society and Social Conscience

A. American Ways of Life
B. Social and Humanitarian Movements
C. Environmental Conservation
D. Recreation

ILLUSTRATIONS

The proto-landmark: Blair House, Washington, D.C., and its national historical marker, placed December 1940. (Photos by the author, 1984)

THE BLACK HOUSE

The first national historic landmark: the Sergeant Floyd Monument, Sioux City, Iowa, designated June 30, 1960. (Photo by Jonathan Blair, 1964)

A recent national historic landmark: Steam Schooner Wapama, San Francisco, California, designated April 20, 1984. (Photo by Richard Frear, 1981)

Octagon House, Washington, D.C., designated December 19, 1960, and bearing one of the early landmark plaques with the names of the Secretary of the Interior and Director of the National Park Service. (Photos by the author, 1984)

THE COTTAGE

The State, War, and Navy (Old Executive Office) Building, Washington, D.C., designated November 11, 1971, situated across Pennsylvania Avenue from Blair House and from the former Carnegie Endowment for International Peace headquarters, designated May 30, 1974. The latter bears a custom interpretive landmark plaque procured by the recipients. (Photos by the author, 1984)

CARNEGIE ENDOWMENT
FOR INTERNATIONAL PEACE
700 JACKSON PLACE
HAS BEEN DESIGNATED
A
NATIONAL HISTORIC LANDMARK
UNITED STATES OF AMERICA
NATIONAL PARK SERVICE
1974

Cleveland Abbe House, Washington, D.C., designated May 15, 1975. The design and text of its landmark plaque reflect current practice. Like many other landmarks, it also bears a privately placed plaque describing its historical associations. (Photos by the author, 1984)