

# Our Speakers

What's Happening at the National Park Service: Reviewing NPS Guidance and Its Impact on Project Design and Finance



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# NPS Updates

- Annual Report
- Staffing
- Frequent User Training
- 2025 Work Plan
- NC SHPO Updates and Report



# NPS UPDATES



# Fiscal Year 2024 at a Glance

**1,307** Certifications of significance (Part 1)

**1,099** Preliminary certifications of rehabilitation (Part 2)

Estimated rehabilitation costs ..... \$10.70 billion  
 Median project QRE ..... \$1.66 million  
 Average project QRE ..... \$9.74 million

**853** Certifications of completed work (Part 3)

Estimated rehabilitation costs ..... \$6.15 billion  
 Median project QRE ..... \$1.30 million  
 Average project QRE ..... \$7.21 million  
 Rehabilitated housing units ..... 4,957  
 New housing units ..... 9,482  
 Low- and moderate-income housing units ..... 6,172

QRE = Qualified rehabilitation expenditures

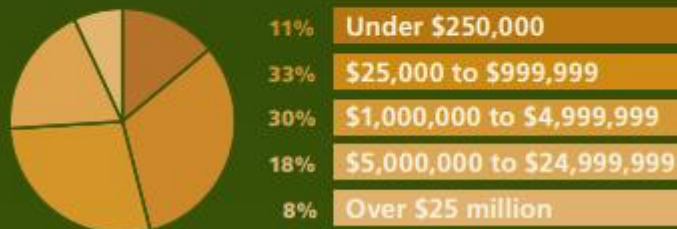
Over \$6.15 billion in private investment in historic preservation and community revitalization.

Projects both big and small—44% of all completed projects (Part 3) were under \$1 million QRE and 11% were under \$250,000 QRE.

New National Register nominations—about 15% of projects involved properties not yet listed in the National Register of Historic Places.

Thirty-nine states have state historic tax credits that can be used in tandem with the Federal historic tax credit.

## FY 2024 Size of Projects



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# FREQUENT USER TRAINING: THE STANDARDS

- Flooring
- Schools, Theaters, Houses of Worship
- 20<sup>th</sup> Century Office Buildings
- Main St. Buildings
- Industrial Buildings
- Accessibility
- Additions/New Construction



# NPS 2025 WORK PLAN

- Administrative Program Guidance
  - PDIL, Phasing, Preliminary Consultation, White Box
- Guidance on the Standards
  - LVT, Solar Film, Furring, Atriums, ITS Bulletins
- Training and Education
  - Frequent Users, SHPO
- Other Guidance
  - Wildfires, Brief 24 HVAC, Brief 32 Accessibility, Windows, Brief 2 Repointing, Snapshot Series



January 13, 2025

Brian Goeken  
Chief, Technical Preservation Services  
National Park Service  
Technical Preservation Services  
1849 C Street NW, Mail Stop 7243  
Washington, DC 20240

RE: Fiscal Year 2025 Technical Preservation Services (TPS) Annual Work Plan – Guidance, Publications, Training, and Outreach

Dear Brian,

Thank you for the opportunity to comment on the FY 2025 Technical Preservation Services (TPS) Annual Work Plan (the "Plan"). The Historic Tax Credit Coalition (HTCC) appreciates the publication of the Plan and your request for comments. We also welcome continued collaboration between you, the TPS staff and our NPS Committee, especially through our quarterly meetings.

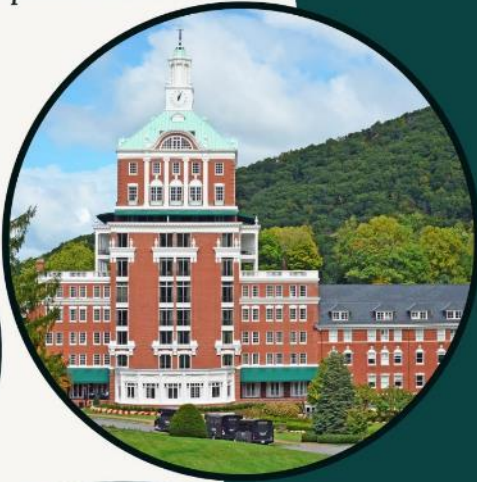
The Plan does an excellent job of addressing the major areas that we have discussed with you. We agree that these areas will benefit from TPS guidance, and the Plan will be very helpful to preserving America's historic buildings and assisting program users. In this letter, we offer some suggestions as to how specific items in each of the areas might be addressed.

Before addressing the substance of the Plan, we have one question: Many of the topics identified in the Plan as provided on the website (<https://www.nps.gov/orgs/1739/upload/tps-fy25-workplan-guidance-publications-training-outreach.pdf>) have hot links to existing content. Does this indicate that some of these items have *already* been addressed in the Plan? Or that the items found at these links are expected to be augmented or modified?



# The Secretary of the Interior's *Standards for Rehabilitation:*

An Examination of Views and  
Recommendations for Improvement



**MARCH  
2025**



**NCSHPO**

National Conference of  
State Historic Preservation Officers

<https://ncshpo.org/2025/03/06/ncshpo-releases-soi-standards-report/>

- **Executive Summary**
- **Full Report | SOI Standards**
  - **Appendices:**
    - **a. Bibliography**
    - **b. Literature Review**
    - **c. Stakeholders Survey Questions**
    - **d. SHPO Survey Questions**
    - **e. CLG**

# Overarching Themes

- The majority of respondents surveyed do not take issue with the Standards and agree that they lead to positive preservation outcomes.
- Respondents generally feel that the Standards lend themselves to interpretation, encourage flexibility and creativity.
- Respondents have a strong need for both updated and new guidance and training in various accessible formats; many think reviewers should expand their own knowledge by partaking of training on a broad array of topics.
- Respondents noted process and program concerns, including evaluating the impact of financial incentives and challenges related to project costs, assisting applicants in making complete submittals, ensuring preservation reviews occur early in the project planning process, and maintaining good working relationships across parties.
- Respondents noted the need for additional outreach that shows positive preservation outcomes and help in countering myths and misinformation.

# Summary of Recommendations

- NPS Technical Preservation Services (TPS) should host biannual listening sessions on the Standards, inviting a variety of subject matter experts.
- NPS TPS should open regular comment periods on the Standards.
- NPS and NCSHPO should invite stakeholders to a convening specifically focused upon the degree to which the Standards can and should be applied with flexibility.
- NPS TPS should work with stakeholders to transparently and regularly update its guidance on the Standards.
- Preservation agencies and organizations should develop training on the Standards that is appropriate to a variety of audiences, including beginners and the general public; reviewers need a broad range of training related to the Standards along with other topics related to project management, financing, and construction.
- NPS TPS should develop a definition of, and guidance about evaluating “economic and technical feasibility” (36 CFR 67.7b)

# Summary of Recommendations, continued

ACHP, NPS, SHPOs, THPOs and Agencies should work together to develop guidance on Section 106 Adverse Effect and National Register DOEs

- Funding organizations and agencies, as well as advocates, should explore complementary funding, incentives programs, and partnerships to address rehabilitation needs not met by existing preservation programs.
- For Historic Tax Credit and Section 106 review projects, encourage and engage in early and frequent coordination and communication while providing clear explanations of decisions, challenges and opportunities.
- For Historic Tax Credit projects, to address concerns of timelines, consistency and redundancy, NCSHPO, SHPOs, and NPS TPS should examine and evaluate the necessity and effectiveness of the SHPO/NPS dual review process.
- Enhance legislation as needed to continue to simplify and incentivize historic preservation and to increase funding for SHPO offices to provide the needed technical assistance for tax projects, National Register nominations, and other related projects.
- Conduct more outreach on the positive aspects of preservation to combat perception that preservation reviews cause project delays.

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