



THE
PRESERVATION SOCIETY
OF NEWPORT COUNTY

April 30, 2019

Ms. Joy Beasley
Deputy Associate Director
Cultural Resources, Partnerships and Science
National Park Service
1849 C. Street NW, MS 7228
Washington, DC 20240

RE: RIN (1024-AE49) National Register of Historic Places Proposed Rule Changes

Dear Ms. Beasley,

The Preservation Society of Newport County is a non-profit organization accredited by the American Alliance of Museums and dedicated to preserving and interpreting Newport County's historic architecture, landscapes, decorative arts, and social history. Preservation advocacy and policy have been at the core of the Preservation Society's mission since the organization was founded in 1945.

The Preservation Society of Newport County is based in Newport, Rhode Island, a city noted as one of the most historically intact cities in America. The City of Newport was fortunate that years before national policies were enacted, grassroots preservation organizations like The Preservation Society of Newport County were established—saving several of the city's architectural gems from demolition. Although Newport continues to have strong community support for preservation, continued preservation efforts would not be possible without tools like the local historic districts, the National Register of Historic Places and Historic Tax Credit Programs.

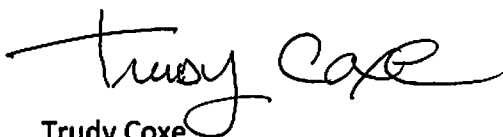
Preservation grew out of the efforts of a few dedicated individuals into a national movement. Its success is driven by collaboration and coordination between federal, state, and municipal agencies with non-profit organizations and private individuals. The proposed rule changes undermine this collaborative nature by giving federal agencies sole authority over federal properties and removing the public appeal process for nominations. Just as the Newport Mansions define Newport, federal properties are a key historic resource within many communities and contribute to their sense of place. The proposed rule changes would result in fewer federal properties being added to the National Register, placing these important

resources at a higher risk of loss. Once we lose part of our tangible heritage, we can never get it back.

The National Register is more than a database of the Nation's most significant cultural and architectural heritage; it is an important tool for economic development and community planning. The research and documentation used to evaluate historic properties is the basis for determining if a property qualifies for the Historic Tax Credit program and informs rehabilitation projects. The Historic Tax Credit program encourages investment in the rehabilitation and reuse of historic buildings. As stewards of the Newport Mansions, we understand the cost of preserving a community's sense of place. Access to these types of financial incentives can be the difference between preservation-minded revitalization or not. The proposed rule changes could effectively obstruct access for properties eligible for tax credits by giving federal agencies and large property owners the unequal weight to object to a nomination and prevent a historic district from being listed. If a community is unable to preserve its historic properties, it will eventually lose its unique character.

The proposed changes by the National Park Service (NPS) to the sections of the Code of Federal Regulations (36 CFR 60, 36 CFR 63) governing nomination to the National Register of Historic Places would substantially impact preservation and revitalization in communities across the United States. Changes to the rules should avoid undermining such an important economic driver like historic preservation. It is strongly urged that the changes be reconsidered, and future revisions maintain the effectiveness of these important preservation tools.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Trudy Coxé". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

Trudy Coxé

CEO & Executive Director

The Preservation Society of Newport County