

BOSTON PRESERVATION ALLIANCE

April 18, 2019

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Gregory J. Galer, Ph.D.

National Register of Historic Places

National Park Service

1849 C Street NW, MS 7228

Washington, DC 20240

Re: NPS-2019-0001, National Register of Historic Places (RIN 1024-AE49)

Dear National Park Service,

The Boston Preservation Alliance is Boston's primary, non-profit advocacy organization that protects and promotes the use of historic buildings and landscapes in all of the city's neighborhoods. With 40 Organizational Members, 125 Corporate Members, and a reach of 35,000 friends and supporters we represent a diverse constituency advocating for the thoughtful evolution of the city and celebration of its unique character. We appreciate the opportunity to offer comments on projects that impact the historic character of the city.

We appreciate the opportunity to comment on these critical rule changes that negatively impact the historic preservation process. We firmly OPPOSE the proposed changes and strongly urge the department to consult with tribal and preservation professionals across the country to refine any potential proposal. The changes proposed undermine the intent and the proven successes of the National Historic Preservation Act (NHPA). Decisions about the country's historic places should be made by preservation professionals with extensive knowledge and experience in the field, not federal agencies attempting to execute their own goals which often contradict those of the NHPA.

Boston is one of the country's most historically significant cities and we are stewards of many of our nation's earliest extant buildings and public spaces. This rule change would make it harder for us to protect these spaces from private interests and to offer access to the funding that is required to maintain these historic resources for future generations.

The proposal simply puts too much power in the hands of large land owners and federal agencies, who do not always operate for the benefit of the American people without the current oversight of the NHPA.

Any revisions to the NHPA should emerge via a collaborative, transparent process with tribal and preservation professionals across the country. The current proposals must be rejected and reassessed by this collective group.

Sincerely,



Greg Galer
Executive Director