

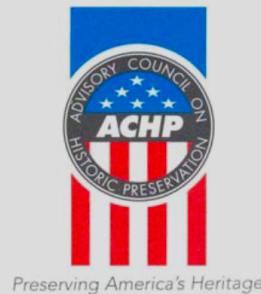
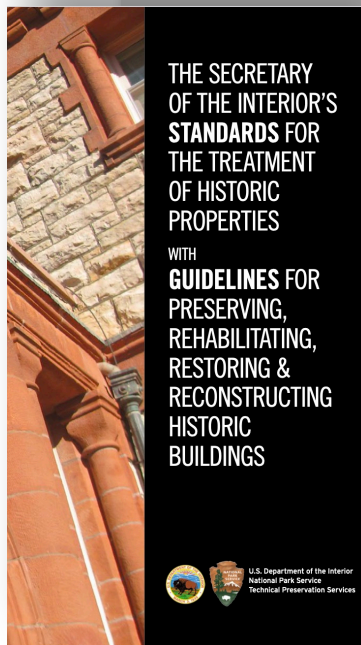
10 Ways Historic Preservation Policy Supports White Supremacy and 10 Ideas to End It

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Dear Mr. [REDACTED] :

On September 17, 2008, the Advisory Council on Historic Preservation notified you regarding notification and supporting documentation regarding properties listed or eligible for listing in the National Register of Historic Places. Based on the information you provided, we have concluded that your proposed project, as described in the *Reviewing Individual Section 106 Cases*, of our report dated September 17, 2008, does not apply to this undertaking. Accordingly, a public hearing and consultation to resolve adverse effects is needed. If you are the Michigan State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer, affected



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EXECUTIVE SUMMARY

In the United States, policy-driven work in historic preservation comprises about three-quarters of the field's work. Preservation policies, especially through rules and regulations, directly impact millions of Americans and redistribute billions of taxpayers' dollars each year. These policies principally revolve around federal regulations that arise from the National Historic Preservation Act of 1966: the National Register of Historic Places, the Secretary of the Interior's Standards, environmental (preservation) reviews of federal undertakings, and the Rehabilitation Tax Credit. At the local level, the most important policies are embodied in preservation ordinances that require property owners to retain the "historical integrity" (or authenticity) of locally-designated buildings when changes are proposed to these properties.

Support for White supremacy is a cultural practice that places a high value on perfectionism, the means justifying the end, protection of power, objectivity and measurability, dominance of the written word in communication, binary thinking, paternalism, fear of open conflict, workplaces that reward individuals and not teams, and a definition of "progress" that is synonymous with continual expansion. To be clear, this paper does *not* address contemporary individuals who hold or act upon racial bias; it only and very specifically focuses on how preservation policies *support* White supremacy.

Addressing issues of diversity, inclusion, and equity in federal and local preservation policies has usually been synonymous with the need to recognize the history of people with non-dominant racial or ethnic identities. While this omission is very much a policy problem, it is far from the only manifestation of how preservation policies support White supremacy. Moreover, the intersection of the field's pervasive regulatory climate and issues in equity and inclusion are largely unaddressed in the literature. This paper therefore explores *how* White supremacy manifests in the 70% of the field's practice that is driven by regulatory requirements, or, in a broader sense, the area of preservation practice that relates specifically to policy-related endeavors. Although important, this paper does not focus on the remaining areas of the preservation enterprise, which encompass site interpretation, advocacy, and construction/design/materials conservation, unless there is an explicit overlap with preservation policy.

The main themes that this paper therefore covers are as follows:

1. The vast majority of people who work or volunteer in policy-related preservation endeavors or who study in historic preservation degree programs are White. There is a significant lack of representation from African Americans, Asian Americans, Latinx people, or Indigenous people (among other possible groups with non-dominant identities) in policy-driven preservation work or in educational programs related to this work.
2. Preservation policy sustains the erasure of the place-based history of people with non-dominant racial or ethnic identities; policy is used as a paternalistic tool to force marginalized groups to adopt racially biased historical narratives.
3. Preservation policy makes it more difficult to document the lives and places of people associated with non-dominant racial or ethnic identities.
4. Historical integrity, as promulgated by rules and regulations for the National Register of Historic Places, is biased against people with non-dominant racial or ethnic identities.
5. Preservation policy supports placation and tokenism in its public "engagement" requirements related to planning efforts; there is too much emphasis in preservation policy to be an objective, check-the-box endeavor.

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6. Preservation policy reinforces many of the stereotypes around the field's support for White material and visual culture.
7. Preservation workplaces that primarily exist for the purposes of regulatory compliance suppress innovation and dissent, including efforts around diversity, inclusion, and equity.
8. Preservation policy makes little or no attempt to support affordable housing.
9. The doctrinal values that undergird preservation's rules, regulations, and guidelines originate entirely from the ideas of White men, some of whom espoused racial supremacy ideals.
10. There is very little, if any, funding to address the problems around how preservation policy supports and sustains White supremacy.

Using these ten problem areas, this paper then makes a recommendation for ways to solve some of these issues, with a central recommendation that the National Park Service and the Advisory Council on Historic Preservation need to open up the rule-making process around the National Register of Historic Places and the Secretary of the Interior's Standards. These federal agencies also need to create and support a platform for widespread engagement with a diverse public in addressing these issues. A secondary theme is to support people-centered changes to historic preservation policy, including more flexibility around what have often been dogmatic approaches to significance and integrity. Lastly, the end of this paper presents a table that gives example arguments that support White supremacy in preservation policy and some potentially useful responses.

INTRODUCTION

In the historic preservation field, since at least the early 1990s, addressing issues of diversity, inclusion, and equity in practice and research has usually been synonymous with the need to recognize the history of people with non-dominant racial or ethnic identities (e.g., Kaufman 2009; Hayden 1995; Dubrow 1998; Lee 1992).¹ While this omission is very much a problem in the field, it is far from the only manifestation of how historic preservation supports White supremacy. The field's association with paternalism, objectivity, avoidance of conflict, binary thinking, and protection of power are all factors that also need to be revealed and addressed in order to help solve the social justice issues in the field. Moreover, the intersection of the field's pervasive regulatory climate and issues in equity and inclusion are largely unaddressed in the literature.

Because of this gap in the literature, there is a lack of a consensus about *how* White supremacy manifests in the 70% of the field's practice that is driven by regulatory requirements (Wells 2018). I will therefore primarily focus on this area of practice, especially in how it is supported and sustained by preservation policy; thus, for the purposes of this paper, "preservation policy" refers not only to the actual policies (e.g., laws, rules, regulations, guidelines), but to how these policies are implemented. Although important, the focus of this paper will not be on the remaining areas of the preservation enterprise, which encompass site interpretation, advocacy, and construction/design/materials conservation, unless there is an explicit overlap with preservation policy as defined, above. Other authors have substantially covered these latter areas of practice, especially authors with non-dominant racial or ethnic identities, to which I direct the reader.

This paper is based on my two-decades of research into the ontological and epistemological origins of historic preservation in relation to the field's orthodox doctrines, laws, rules, and regulations. My interest in developing a people-centered preservation practice, which is founded on applied social science methods and community-based participatory research, also influences this paper's content. Through this work, I have long known that not only the practice of historic preservation, but its theoretical foundations, fundamentally support White supremacy. While the recent events around Black Lives Matter has made it easier to

Historic preservation impacts millions of Americans each year

- Preservation directly affects about a million private property owners in the US. More than [2,300 municipalities across the country have a preservation ordinance](#) and at least one local historic district.
- Preservation work is driven by hundreds of thousands of federal interventions each year. The Federal Communications Commission, alone, does more than [10,000 legally required preservation reviews each year](#).
- Each year about \$6 billion in taxpayer dollars is used to [fund private developers' building rehabilitation projects](#).
- Preservation provides a significant number of jobs to Americans. There are about 15,000 people who work in some aspect of policy work in historic preservation.

¹ Throughout this paper, I use the phrase "people with non-dominant racial or ethnic identities" instead of "people of color," or an acronym, such as BIPoC (Black, Indigenous, People of Color). Where it is possible to call out specific identities, I have done so. My wish is to avoid inadvertently overemphasizing one identity over another.

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discuss White supremacy and racism (and use these terms) in historic preservation, this is the space in which I have been operating for some time. It is deeply sad and disturbing that it required the loss of African American lives to embolden White preservationists to begin to directly discuss and address the issues described in this paper. I am as complicit as any other White person in waiting to discuss these topics, holistically, until now.

I started outlining the basis of this paper in the winter of 2019 to help me in writing a series of blog posts on my web site (heritagestudies.org) that addressed the way in which the regulatory environment and historic preservation supported White supremacy. In the summer of 2020, I joined with colleagues in my school to work on a “teaching innovation” grant where my main focus was on how to decolonize an historic preservation curriculum and engage in an anti-racist teaching pedagogy. I used these earlier notes from my blog posts to help me in my work, but realized that in order for me to understand how to decolonize historic preservation, I had to define, in much more detail, how historic preservation supports White supremacy. I therefore wrote this paper to help me in my decolonization/anti-racist pedagogy work. By June of 2020, a first draft of this paper was complete. In reflecting on what I had created, I realized that it appeared to be unique and perhaps of use to others, especially fellow preservation educators as well as policy makers and implementers.

As a preservation educator, my goal is to be an accomplice for racial justice (see Powell & Kelly 2017) and to leverage my privilege to destabilize the field’s tacit support of White supremacy. An accomplice is different from an ally; allies support a social justice cause, but may choose their activities for self-interest, thereby “profiting” from their allyship (*ibid.*, 45). An accomplice, on the other hand, accepts an increased level of risk in their work which may potentially result in self-harm. In my life, a couple of examples are salient: I gave up the security of tenure to go back on the tenure track so I could contribute to an historic preservation program that explicitly aligned itself with racial justice and equity. And, for more than 20 years, I have pushed for a people-centered preservation practice and endured verbal abuse, ridicule, and denial of opportunities and resources because I was not a “real” preservationist. (In this context, “real” preservationists express an unwavering allegiance to historic fabric, which may unintentionally place a higher importance on the treatment of fabric over the treatment of people.) Yet, in all this, I knew that my status as a White male made it less likely that I would “suffer” for my choices; I realize my experiences are trivial compared to many marginalized members of society. But, I did not have to choose to take these risks. I assumed them because I knew it was the right thing to do.

I am, to the best of my ability, trying to understand my role as a White male within two systems built on White supremacy: higher education and historic preservation. I recognize the possibility that my voice, because of my privilege, may be heard above the voices of my colleagues with non-dominant racial or ethnic identities, but this is a space with few voices, of any identity. When authors with non-dominant racial or ethnic identities begin to systematically address preservation policy with a central focus on rules and regulations, I would direct the reader to listen and learn from these individuals and put this paper aside as an historical record. I mention a number of authors with non-dominant identities in this paper whose work addresses some aspect of the preservation field and thus can inform the policy discussion. Please refer to their work.

Before I begin, I want to provide credit to others who have also attempted to broach this topic in related contexts, such as Frank Vagnone’s exposé on the [“Systemic Bias & Racism of Preservation”](#) and Bill White’s [observations on racism in archaeology](#). Their thinking has helped me in framing some of my arguments. I should also acknowledge that significant areas of my analysis apply to

other marginalized groups, such as people who identify as LGBTQ+ and women, but the fact that I have not included specific arguments or resources for these groups should not be interpreted as a lack of importance, but rather a reflection of the particular topic in which I am engaging. I encourage others to apply what I have done here to broaden the coverage of marginalized groups and historic preservation.

Because this paper is an attempt to define how preservation policy in the United States *supports* White supremacy, I therefore will not engage the question on whether or not there are White supremacists who work in historic preservation: my focus is very specifically on the system, not the people who implement the system. Before I present 10 ways that preservation policy supports White supremacy, however, I need to define the nature of White supremacy and the character of the preservation enterprise in relation to policy. I will then end this paper with 10 suggestions for ending preservation policy's support of White supremacy.

WHAT IS WHITE SUPREMACY IN A FIELD? A FOCUS ON CULTURE.

White supremacy describes an institutionalized system that positions the power and legitimacy of White people's ideas, actions, and social positions above other racial and cultural groups (Dei 2018; Martinez 2004; Okun 2010). It is a pervasive and socially embedded process that, as George Dei (2018, 27) describes, "is naturalized and reproduced through interlocking laws, policies, social norms, institutional and spatial arrangements, and knowledge production." Thus, White supremacy is a filter through which "legitimate" knowledge is certified thereby establishing an "objective" empirical reality that assures the views of people with non-dominant racial or ethnic identities are exposed to "perpetual subjectivity" (Bonilla-Silva & Zuberi, 2008, 17). Or, in another sense, the "White logic" at the core of White supremacy is used to "civilize" or "colonize" people with non-dominant racial or ethnic identities (ibid., 18).

White supremacy in a field is based on a common set of beliefs, values, and behavior that institutionalizes Whiteness and Western ideals as superior to other ways to knowing: Whiteness is normalized while the perspectives of people with non-dominant racial or ethnic identities are "othered." In White supremacist culture, these "othered" ontological and epistemological perspectives require extra justification for their validity and are external to normalized dialog in a field. More specifically, White supremacy manifests in a field, such as historic preservation, in two important ways: 1) a field's theory and philosophy is predominantly or entirely defined by White authors/intellectual leaders; and 2) the authors, practitioners, and teachers in a field are predominantly White, and thus fail to reflect the general population. The supremacy of this theory/philosophy and the authoritative power of its White practitioners and scholars is sustained through normative cultural practices and reproduced by institutions.

To understand White supremacist culture, I rely on the materials provided by dRworks' [Dismantling Racism Workshop](#) and Sharon Martin's [Challenging White Supremacy Workshop](#). For many years, both workshops have used materials created by Kenneth Jones and Tema Okun (2001) to understand the cultural reproduction of White supremacy, which I describe below, in relation to historic preservation.

Jones and Okun (2001) provide several key characteristics of White supremacist culture that I summarize below. I will use these characteristics to help identify White supremacy within historic preservation theory and practice as it relates to policy.

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Perfectionism: A focus on pointing out people's mistakes rather than appreciating their work, which discourages curiosity, open-mindedness, and understanding. Perfectionism is closely associated with objectivity (see below), in which only "objective" work is of the best caliber.

The means justify the end: Workplaces are often chronically short of time and resources. This situation is then used as an excuse to delay or not address inclusivity, democratic thinking, or long-term consequences.

Protection of power: Workplace systems and policies protect power and fail to prevent abuse, which encourages defensiveness. Power is conceptualized as a limited resource that can only be shared under exigent circumstances. People who have power are not encouraged to understand how it affects others. People who have power are more deserving of emotional and psychological comfort and have the unique right to blame others for failures.

Objectivity and measurability: Success must be measurable; if it can't be measured it doesn't exist. Because "success" in this context for process and democratic decision-making can't be measured, these attributes are not valued. The value of emotion and feelings in workplace interactions, practice, and research is ignored. People with power reprimand "illogical" or emotional communication.

Dominance of the written word in communication: Writing skills are more highly valued than other communication skills, including emotional intelligence and relationship building.

Binary, closed thinking: Forcing others to think that there is only one solution or one right way to address a problem or understand an issue. Complex problems are made artificially simple. People who fail to take the "correct" side are "wrong." This results in workplace cultures that do not respect divergent thinking or openness to try different processes.

Paternalism: Lack of transparency about who can make decisions and how they are made; only people who have power know how the system works.

Fear of open conflict: Powerful people choose to ignore conflict; they use this power to chastise others who express divergent thinking. Being polite is more important than helping people to understand and address conflict.

Individualism: Lack of respect for collective problem solving and idea generation; emphasis on individual action. Workplace rewards individuals and not teams. This perspective encourages isolation, competition, and a lack of accountability.

Progress is synonymous with continual expansion: This perspective undervalues how smaller projects have the potential to impact individuals more profoundly and personally. As the size of organizations and their projects increase, interaction with stakeholders becomes more depersonalized and less effective.

In discussions of environments, such as compliance-based preservation work, that support White supremacy, there may be an assumption that only White people can engage in behavior that sustains this kind of culture. As Dee Watts-Jones (2002, 592) explains, however, through a process of "internalized racism," it is possible for people of color to engage in the reproduction of "institutionalized emotional, cognitive, behavioral, and social policy practices that assume and/or promote the cultural, biological, and socioeconomic superiority of European decent." To provide additional context for this observation, Watts-Jones (ibid., 598) advises that while "it is important that people of Eu-

ropean descent look deeply into their [racial] anxiety to understand its source [and] be responsible for it,” it is not the responsibility of people of color to “try to detour or avoid” the racial anxiety of White people.

DEFINING PRESERVATION POLICY

Since the establishment of the National Historic Preservation Act in 1966 and its foundational regulations in the 1970s, historic preservation policy has been interchangeable with its mandate to implement rules and regulations in the areas of listing buildings, controlling interventions in the fabric of buildings, and administering financial incentives for preservation. This observation is justified by the fact that about 70% of historic preservation jobs would not exist without regulatory requirements around environmental review (Section 106 of the National Historic Preservation Act, focused on identifying properties on, or eligible for listing on, the National Register of Historic Places) and local design review (approval of changes to historic buildings by property owners, largely based on the Secretary of the Interior’s Standards) (Wells 2018).

The remaining 30% of historic preservation jobs in the United States exist outside of this policy framework and will not be the focus of this paper. More specifically, about 11% of preservation jobs are associated with architectural (design) firms, construction, and scientific materials conservation, 9% address historic site administration and interpretation, 6% focus on advocacy, and 4% center on downtown revitalization/regeneration (Wells 2018).

Although this paper will focus mostly on federal preservation regulations (e.g., National Register, Section 106), It is important to note that these regulations are ubiquitous across all levels of preservation practice in the US, including at state and local levels. More than 80% of all local preservation ordinances, for instance, either directly reference or are substantially duplicative of the National Register and Secretary of the Interior’s Standards (Avrami et al. 2018). Both of these regulations are also used by funding agencies (including non-profits) to control the kind of work preservation professionals do. And federal preservation regulations are part of the curriculum of historic preservation degree programs, presented as part of normative practice.

As some earlier commenters on this paper have rightfully noted, my focus on the primary work of the preservation enterprise in this paper—preservation policy and its implementation—is, in itself, helping to normalize the White supremacy supported by this practice by giving it continued life. It is difficult, however, to critique a system without describing the system and I know no reasonable way around this limitation. But, nothing in this paper would prevent the potential dismantling and rebuilding of the policy-centered work of the preservation enterprise to be something fundamentally different than it is today, including a much stronger focus on community-based planning and empowerment and less on regulation.

Now that the reader is grounded in the definitions of White supremacy and policy, I will now present 10 ways that preservation policy supports White supremacy.

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Reason 1: Most people who work, study, teach, or volunteer in activities created and sustained by preservation policy are White

Data show that there is an extreme lack of diversity among the people whose paid or volunteer work or studies exist because of preservation policy:

- 99% of preservation practitioners are White (Cep 2020);
- Most students in historic preservation degree and certificate programs are White. According to the US Department of Education, almost 85% of students who graduated between July 1, 2018 to June 30, 2019 with a preservation major at the undergraduate or graduate level identified as White/Non-Hispanic. Of these graduates, 1.0% identified as American Indian, 2.3% identified as Asian, 2.8% identified as African American, and 6.4% identified as Hispanic or Latino (figure 1). For reference, in this same time period, independent of major, about 60% of graduates identified as White/Non-Hispanic.
- As of December 2018, there were no African American tenured or tenure track faculty with at least a 50% teaching appointment in historic preservation degree programs, no indigenous people, and essentially no people of color (Wells 2020);
- Most people who volunteer in policy-related endeavors (e.g., preservation commissions) are White.

Outside of work created and sustained by preservation policy, there is evidence of much higher levels of participation by people with non-dominant racial or ethnic identities, such as African Americans, in place-based history endeavors. For instance, in her thesis, Aileen Alexis de la Tore (2003) discovered that, in many states, there are more organizations that focus on African American history than would strictly be expected based on a total share of the population of this group. One only need flip through a directory of the American Association for State and Local History to realize that there is significant representation from people with non-dominant racial or ethnic identities. But, critical for the inquiry here, the work of these organizations—although very important—is not created and sustained through preservation policy and is therefore outside the scope of this paper.

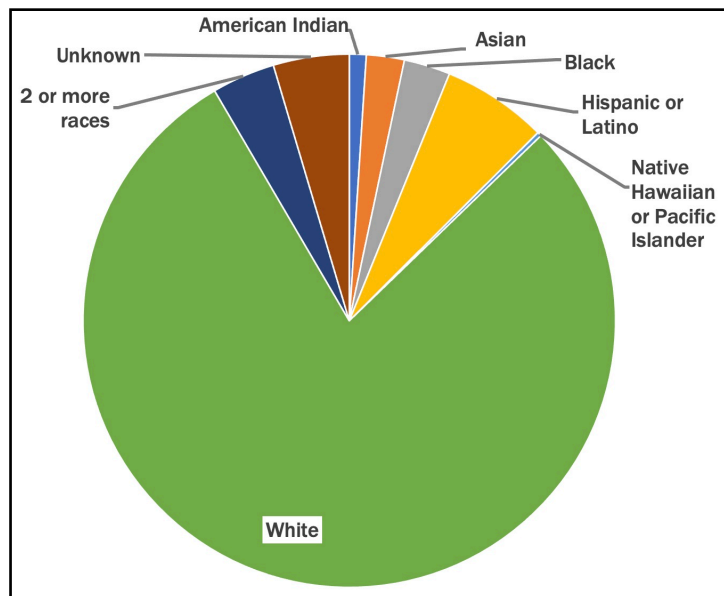


Figure 1. Race and ethnicity of graduates of historic preservation degree & certificate programs, July 1, 2018 to June 30, 2019. (Data from the US Dept. of Education.)

Since there is no research on the workplace culture created and sustained through preservation policy, it is difficult to know the precise reasons there is a lack of diversity. Historic preservation shares similar problems with a lack of diversity that also exists in architecture, landscape architecture, and archaeology (Syrkett, Warerkar, & Sisson 2017; Boone 2020; Odewale et al. 2018). But, it ap-

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pears likely that this lack of diversity is, in part, sustained because most prospective students never learn that the field exists. “Historic preservation” is not a well-known career field to guidance counselors, and the public is not particularly aware of its professional endeavors, especially in relation to policy. Architecture and archaeology, in comparison, do not suffer from this obscurity and are well known fields to students and the public, helped in no small part through popular movies that have featured these kinds of professionals.

There is some research on how African American students choose a career path that suggests why these students do not choose historic preservation. Carnevale et al. (2016) found that African Americans are “highly represented in majors associated with serving the community”: 20% select a major related to community organization and 19% select a major related to social work. Brown and Segrist (2016) found that African Americans are more likely to have successful careers and become leaders if they “placed a greater value on connections with their African heritage, African values and beliefs, and a sense of racial community.” Both of these studies suggest that compared to other types of students, African American students may be particularly attune to the needs and identity of their communities. This evidence suggests that African Americans may avoid historic preservation because of its association with the connoisseurship of White culture and White communities. Or, it may simply be that these prospective students have little interest in a field that appears to care more for buildings than people and communities. A third possibility exists: perhaps prospective students do not associate historic preservation with community-based endeavors, even though many such opportunities exist.

Research in other fields indicates that while seeing African American and Latinx professionals as role models does not seem to increase whether an African American or Latinx student will choose a major, having these kinds of professionals actively encourage these students to choose a major does make a significant difference (Jones & Larke 2001). Given how few people with non-dominant racial or ethnic identities work in some area of the preservation enterprise, this might explain, in part, why the lack of diversity in the field appears to be self-perpetuating.

For people with non-dominant identities who are aware of historic preservation, there may be additional factors to consider. I have found that as my students begin to learn about the field, the perception arises that many efforts to address diversity and inclusion in historic preservation appear to be token gestures that preserve the White dominance in the field. I have heard this perspective from other NCPE (National Council for Preservation Education) educators and it is a common criticism of the field by professionals with non-dominant racial or ethnic identities, as was recently seen in a group letter to NCPE.² Similarly, for any student or professional, already in the field, it is also easy to see that there is little visible path for advancement of people with non-dominant identities to higher paid positions of leadership: nearly all preservation leaders in well-paid and powerful positions, at the top of the power structures in their organizations, are White and male.

To be sure, the perception that there is no money in preservation drives many students away from considering the field, regardless of race or ethnicity (Lee 2003, 392). When I was teaching in an undergraduate historic preservation program, this perennial question was always one asked by the parents of prospective students who perceived the field to be more of a hobby than a career. Based on a census of all preservation job postings in the US that I collected from June 1, 2016 to May 31,

² “A response to the National Council for Preservation Education’s open letter on racial diversity” is available on the Asian & Pacific Islander Americans in Historic Preservation web site at <https://www.apiahip.org/research-advocacy>

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2017, the average salary shared by employers was just over \$60,000 per year. While this does not represent entry-level salaries, it does provide evidence that the field's compensation is not unusually low, compared to other fields in which students might consider majoring.

Since the inception of the first historic preservation degree program in the US in 1973 by Columbia University at the master's level, the assumption has been that one must have a graduate degree to succeed in the field. This assumption has been further sustained over many decades by the Secretary of the Interior's Professional Qualifications Standards that require graduate degrees for such work in the federal government. Many private companies also cite these Secretary of the Interior's Standards when seeking potential employees; my own research shows that most preservation employers require or prefer graduate degrees (Wells 2018).

Since the 1970s, however, this assumption of the need for a graduate degree to succeed in the field has been called into question by a number of scholars and many professionals. In 1978, Paul Sprague (1978) prepared a report on preservation education for the National Trust for Historic Preservation; this report was based on the interview of hundreds of professionals working in the preservation field. The results of his study were deeply unpopular with educators because Sprague questioned the need for a specific degree focusing on preservation, but more importantly for this inquiry, he also questioned the need for a graduate degree to succeed in the field. More recently, Robert Russell (2014) observed that undergraduate historic preservation programs are equally capable of producing professionals who can work in the field as are graduate programs.

To be sure, professionals produced by the few undergraduate degree programs in historic preservation (e.g., University of Mary Washington, Roger Williams University, Southeast Missouri State University, Goucher College) have gone on to work side by side with colleagues who have graduate degrees, doing the same work, and doing such work with equal skill. Having taught historic preservation in associate's (2-year), bachelor's (4-year), and master's programs, I can ascertain with certainty the rather broad overlap in topics and learning outcomes in all kinds of degree programs at all levels; in short, there does not seem to be a clear correlation between the level of degree program and what students are learning. This problem leads to difficulty in how the few institutions who have both undergraduate and graduate degrees in historic preservation differentiate their undergraduate and graduate programs. In most cases, graduate and undergraduate students take exactly the same courses (Wells & Stiefel, 2014).

Is, then, a potential barrier to increasing diversity in the preservation field this assumed requirement for a graduate degree? Considering that most wealth in the United States lies within White families (McIntosh et al. 2020), the cost to attend college for students with non-dominant racial or ethnic identities—especially an additional two years for a graduate degree—is not inconsequential. In sum, White students are more likely to afford college and especially the additional costs for a graduate degree than are students with non-dominant identities. While more specialized areas of preservation, such as architecture and materials conservation, will always likely require a graduate degree, the acceptance of the bachelor's degree for most work that is performed in preservation—especially the 70% of the field's work in the regulatory environment—is critical to improving the diversity of the field. Higher education should be working to develop and normalize bachelor's level historic preservation education if the goal is to address the field's diversity deficit.

Lastly, career redlining is an additional barrier toward diversifying the field. While I am not aware of any studies that address this topic in the preservation workplace, it is a frequent topic among professionals with non-dominant racial or ethnic identities in the field, including students

who complete internships. Career redlining manifests as an assumption that the only expertise people with non-dominant identities can bring to the table relates to their own race/ethnicity/heritage. Because of this stereotype, many such employees can only work on buildings and places that are associated with “their” history and are barred from other kinds of historical resources. And employees that assert their interest to not be stereotyped in this way often find themselves unjustly subject to discipline for creating “conflict” in the workplace.

Reason 2: Policy-enabled (mis)representation and historical erasures

The debate over the retention of Confederate monuments is relevant to this discussion because a preservation policy framework is often used to justify, or in some cases, legally protect these objects. Preservation policies at local, state, and federal levels enshrine “education” as one of the fundamental values of historic preservation. Since the rise of the Black Lives Matter movement, this policy-driven, educational argument has consistently been used to defend the preservation of Confederate monuments. These arguments are based on vague notions that saving these monuments will somehow objectively “teach” Americans about our history, while sidelining the arguments made by people with non-dominant racial or ethnic identities about their exigent reasons for the removal of these monuments.

This supposed ability of the historical object to “teach” is an old trope in historic preservation, going back at least as far as Wendell Phillips’s 1878 impassioned speech to save Boston’s Old South Meeting House because it would teach Americans how to be patriots (Committee on Federal Relations 1878). This is a preposterous and unscientific argument based on some kind of osmotic absorption of historical facts from building fabric. Historical objects can *support* interpretation of the past, but they cannot directly and independently communicate facts.

Even an argument for preservation based on artistic merit falls flat as most of these monuments were mass produced and far from the best examples of artistic craftsmanship.

Moreover, research consistently shows that the public does not seek out historical sites or museums to learn, but to feel and experience (Smith & Campbell 2015). And this is, indeed, the purpose of Confederate monuments: to allow White Americans to feel proud about a racist past and to remind Black people that they are still second-class citizens in this country. If retaining these

Policy controversies over preserving racist monuments

- [“As furor grows, NPS defends ties to Confederates”](#) by Rob Hotakainen (*E&E News*).
- [“Monument Men: Historic Preservation and Confederate Statues”](#) by Patrick Sisson (*Curbed*).
- [“States Are Using Preservation Laws to Block the Removal of Confederate Monuments”](#) by Naomi Shavin (*Art Sy*).
- [“POV: The Controversy over Confederate Civil War Monuments”](#) by Daniel Bluestone (*BU Today*).
- [“NC Historical Commission Agrees to Keep 3 Confederate Monuments On Capitol Grounds, Reinterpret Them”](#) by Jason deBruyn, Elizabeth Baier (*WUNC Public Radio*).
- [“Empty pedestals: What should be done with civic monuments to the Confederacy and its leaders?”](#) by Civil War Times (also in *Controversial Monuments and Memorials: A Guide for Community Leaders*, edited by David B. Allison).

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monuments in public places were to teach anything, it would be that White people continue to have the power to overrule the wishes of communities associated with non-dominant racial or ethnic identities. This is an extreme form of White paternalism—it is for their own good—and is an unethical and wrong position.

To be sure, in 2020, many preservation organizations, such as the National Trust for Historic Preservation, have released [statements in support of the removal of Confederate monuments](#), but this marks a shift in position for a number of these organizations. There are still historic preservationists, in the present, that defend the preservation of Confederate monuments. They are on the wrong side of history.

Within a preservation policy framework, most historical research is completed for National Register (NR) or local register nominations. This kind of research is also extensively used for the interpretation and documentation of historical sites. The creation of an objective, fact-based history of buildings and places is a core principle of this work and is, indeed, enshrined in preservation policy, especially as it related to designation. In the United States, the history of places associated with non-dominant racial or ethnic identities is all around us, but it often takes more effort to find it. Sometimes, preservation professionals and volunteers assume it is not there and do not bother to look or to talk to members of these communities, especially if this work takes too much time and resources or if it is not required by regulation. Occasionally, revealing this history is embarrassing to the dominant White community, which helps to suppress an interest in uncovering it.

Money also plays a significant role in assuring that the histories of White people are more represented in policy-driven preservation practice than the histories associated with marginalized

Policy-led erasures of history

There are numerous examples of how the erasure (or lack of recognition) of the histories associated with non-dominant racial or ethnic identities is a significant problem in historic preservation practice, especially as it is performed as a policy-based endeavor:

- [Michelle Magalong \(2020\) documents](#) how preservation policy presents a barrier in recognizing the histories of Asian Americans and Pacific Islanders.
- Little Manila in Stockton, California was nearly completely erased by unenlightened policies and White developers; [Dawn Bohulano Mabalon, who passed away in 2018, successfully led an effort to save what was left.](#)
- [An interview with Brent Leggs](#), Director of the African-American Cultural Heritage Action Fund at the National Trust for Historic Preservation, describes the challenges of recognizing African American history in preservation practice (Cep 2020).
- In San Antonio, the White community only knew La Gloria as an old gas station that had been abandoned. The Latinx community, through its oral traditions, remember this building as a place where their grandmothers and grandfathers socially connected to build and foster solidarity and identity. Even after repeated public protests by this group, White leaders in the city failed to protect the building under the city's preservation ordinance. Members of the Latinx community in San Antonio refer to this event as a “cultural genocide.” The history of La Gloria still waits to be fully documented. [The Esperanza Center documents what happened in this YouTube video.](#)

racial or ethnic identities. The fact is that it is cheaper to research the history of White people than it is to research the history of people with other identities because it takes less time to find and access records associated with the former group. Policies and guidelines that the National Park Service and State Historic Preservation Offices (SHPOs) promulgate, which emphasize the need for an “objective”, “factual” history, offer tacit support for more inexpensive fact-based archival sources such as census records, city directories, and fire insurance maps, while deprecating more expensive “subjective” historical data, such as oral history or personal manuscripts. Lived experiences are much more expensive to collect and interpret than a pile of historical facts; their use is also easier to undermine because they are not sufficiently “factual.” Cost becomes an even more critical factor considering that a significant number (around 20%) of National Register nominations are written by consultants for developers who want to receive a preservation tax credit for a building rehabilitation project.³ In most cases, developers have little interest in pursuing a more costly nomination for the sake of equity or social justice; the main driver is to obtain the tax credit.

To be sure, the preservation enterprise has greatly improved in this area over the past couple of decades due to the work of advocates like Antoinette Lee (1992), Dolores Hayden (1995), Gail Dubrow (1998), and Ned Kaufman (2009). More recently, Andrea Roberts (2019, 2020) and Catherine Fleming Bruce (2016) have shown the power of action research to help African American communities uncover and become empowered by their collective histories. And there is evidence that these grass-roots histories have led to the increased designation of places associated with people with non-dominant racial or ethnic identities. But, the problems with the erasure of history associated with these identities are far from resolved and remain a significant problem in historic preservation practice, especially as it is performed as a policy-based endeavor.

Within a preservation policy framework, most historical research is completed for NR or local register nominations. This kind of research is also extensively used for the interpretation and documentation of historical sites. Since the conception of historic preservation as a professional field of practice in the 1960s and 1970s, historical research in the field, including efforts related to nominations, has mostly focused on the material culture of rich White men. Over the past couple of decades, there has been an increased focus on historical research

Historical significance lacks representation in policy-led work

- Depending on the source, less than 5% of the nominations on the National Register account for the histories of people with non-dominant racial or ethnic identities, women, or LGBTQ+ people; about 2% addresses African American history, specifically.
- Research by Vincent Michael (2018), Ned Kaufman (2004, 2009), Gail Dubrow (1998), and Casey Cep (2020), among many others, provide additional evidence of the lack of historical narratives focusing on people with non-dominant racial or ethnic identities in the field.
- Research on important historical figures by intra-disciplinary historic preservation scholars from 1978 to 2018 only focused on White people who were mostly male, such as architects, architectural critics, planners, developers, and business entrepreneurs (Wells 2020).

³ See <https://www.nps.gov/tps/tax-incentives/reports.htm>

related to history associated with non-dominant racial or ethnic identities, both for NR and local nominations and the interpretation of sites and places, although there does not appear to be any research available that establishes just how much this increase represents. Regardless, even taking account for the fact that contemporary historical research focuses on more diverse figures from the past, this lack of recognition of a more inclusive history, which also considers LGBTQ+ and women's history, remains a significant problem in the field. And, when a more inclusive history is represented, it often paints individuals bereft

of agency. This perspective ignores many of the powerful, profound, and lasting contributions that people with non-dominant racial or ethnic identities have made, over time, in manifold areas. Or, in another sense, an inclusive history does not need a White context to justify its importance.

Especially within the context of listing buildings and districts, there is great emphasis on objective facts associated with events and people from the past; the collection of more facts means a greater amount of evidence, establishing a semi-quantitative (measurable) performance for establishing greater levels of significance. The method used to tell stories from these facts is archival research, in which the written record is much valued in the form of manuscripts, maps, tax records, deeds, etc. The goal is to present as "truthful," objective, and accurate a past as possible. When the written record is not available, oral history serves as a less desirable substitute, because it is less objective.

The emphasis in NR nominations (and often present in local nominations as well) on a very strong, singularly defined argument for significance is an example of the kind of binary thinking expected in historical research in the field. Significance either exists or it does not; historical integrity either exists or it does not. There is no room for gray areas.

State Historic Preservation Offices (SHPOs) enforce perfection in National Register (NR) nominations: all facts must be properly cited (and ideally based on primary, written sources), make a singularly powerful and cogent argument for significance above the ordinary, and there must be no grammar or spelling errors. Although anyone can submit a NR nomination, in practice most are written by professional historians or people trained in this area. The perfectionism expected in NR

Binary thinking about historical significance in preservation policy

Read the official [policy "bulletins" provided by the NPS in preparing NR nominations](#) (NPS 1997a, 1997b; O'Donnell 1998). All three strongly encourage binary thinking, extreme objectivity, and fact-finding in most aspects of preparing a nomination. None of them have been updated since the 1990s and they read very much like best practices in historical research—from 1970.

The perfectionism expected in National Register nominations is unrealistic

The NR is remarkable in that it was originally envisioned as a democratic process where any member of the public could submit a nomination. In the mid-1980s, however, the National Park Service audited every SHPO in the country to assure that NR nominations represented advanced academic standards in historical research. Since that time, SHPOs have reinforced this perfectionistic goal in the nominations they review. Anecdotally, many of us who work in the field have seen the result of SHPO's redlining nominations through a process that looks more like producing peer-reviewed scholarship than a process meant for the public's benefit.

nominations presents a barrier to members of the public, many of whom are unable to perform to this unrealistically high degree. Most members of the public are not professional historians yet they are expected to perform like one.

Reason 3: Policy that privileges the written historical records of White people

In historic preservation, we need to ask how our narratives support, or do not support, communities who have a stake in their own historical places. Oral history is an effective way at collecting, understanding, and enabling this community-based narrative, yet it is too often neglected in practice. Preservationists, enabled through preservation policy, have largely ignored community stories by over-emphasizing the written record, which is a missed opportunity to help make such communities feel that they are important and valued.

A fact, regardless of historical time periods, is that the more wealthy someone is, the more likely that this individual will leave behind a substantial written record about his/her/their life. In the past, in addition to wealth, men were also more likely to leave behind a substantial written record about their life. Conversely, the less material wealth someone had, the less likely that written historical records will exist for this person.

Given preservation policy's strong preference for written records, this one factor clearly explains why it is so much easier to establish the historical significance for the material culture associated with rich, White men. For many people with non-dominant racial or ethnic identities, however, who often were of more modest means, the written record can be quite thin or altogether absent. With no historical record, there's little possibility to "prove" with historical facts that a particular resource is significant for its association with a person associated with a minority group.

In many cases, however, there is still an oral history record that can be collected by interviewing people with non-dominant racial or ethnic identities. Because preservation policy emphasizes or requires perfection, objectivity, and over-valuing the written record, oral history is consistently devalued. Moreover, policy guidance, such as from the NPS, has a tendency to place the people who are the sources of oral history, and who may not be conventional intellectuals, as untrustworthy, unreliable, or incapable of complex reasoning. This perspective is increasingly being challenged as biased and fundamentally inaccurate; for instance, Keisha Blain's (2019) research on Black women and the global struggle for freedom convincingly presents her oral history participants as being equally capable of complex reasoning and theorizing as are conventional (academic) intellectuals and theorists.

Yet, even where written historical records do exist from people with non-dominant racial or ethnic identities, they tend to be given lower importance than records from White people. Because the activities of communities associated with non-dominant racial or ethnic identities may not nar-

Preservation policy positions oral history as an inherently inferior tool in conducting historical research

- Officials from New Jersey's state historic preservation office [won't accept a National Register nomination](#) for a rowhouse associated with Martin Luther King, Jr. in Camden because too much of the evidence relies on oral history.
- The [New York Landmarks Preservation Commission has dragged its feet](#) on the designation of 227 Duffield Street, a site associated with abolition in Brooklyn for the same reason.

rowly fit into orthodox research questions and topics, White researchers may not bother to look at these kinds of historical records. In addition, written historical records associated with non-dominant identities are much less likely to be neatly catalogued with readily accessible finding aids.

Reason 4: Push for perfection in historical integrity assessments

Built environments associated with wealthy people are, because of their high aesthetic value, less likely to change over time. In comparison, the vernacular, historical landscapes associated with most people can change substantially over time. Because White people, over history, are most often associated with wealth, their material culture tends to have a higher degree of historical integrity (as defined by the NR) than vernacular landscapes, which are more likely to be associated with non-dominant racial or ethnic identities (Bronin 2021).

The lack of historical integrity is one of the most frequent problems that communities associated with non-dominant racial or ethnic identities have in achieving official recognition of their historic places and access to financial resources. The NPS's (1997a, 1997b) documentation for NR nominations makes a binary argument that properties either have, or do not have, historical integrity. NR nominations are required to present objective documentation to prove that integrity exists. Unfortunately, for vernacular resources, it is an NPS policy to disallow integrity arguments that are entirely based on the more subjective "feeling" and "association" aspects; this policy is widely adopted across all aspects of preservation practice.

The field's training and documentation stress finding perfect examples of historic resources that embody historical integrity; relatively minor changes to buildings that are more recent, such as vinyl siding, are used regularly to disqualify them from [listing in the NR](#) or on [local registers](#).

The policy problem with historical integrity

In [Princeville, North Carolina](#), African Americans have undergone a decades-long struggle for the State Historic Preservation Office and federal agencies to recognize their town as officially historic; professionals from these agencies have repeatedly denied the community's requests because the buildings supposedly lack historical integrity.

Reason 5: Planning processes that discourage, prevent, or ignore public participation

Most statutory engagement with the public for planning processes associated with historic preservation are on the low end of Arnstein's (1969) ladder of citizen participation, which is a measure commonly used in planning practice. I will not go into full details here, but would refer the reader to Gibson, Hendricks, and Wells (2020) for how preservation practice lacks meaningful public participation in its processes. The perception of the field as elitist and disconnected from people may, in part, make meaningful engagement with more diverse communities more difficult. In her work in Cleveland, Ohio, Stephanie Ryberg-Webster (2017, 7, 8) observes that members of the African American community believe historic preservation is "costly and elitist, that high-style architecture is valued more than everyday landscapes, and that material integrity trumps social or cultural significance."

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Section 106 review, while promising to offer a higher level of “consultation” with members of the public, is beholden to developers who pay the fees of CRM professionals, and its emphasis on check-the-box processes discourages efforts to reach out and talk to affected community members. In order to reduce workloads, SHPOs and the Advisory Council on Historic Preservation have done little to implement a system that would make it easier for Americans to find out if a federal undertaking might impact their heritage places. Not that this change would necessarily make it easier for members of the public to be a consulting party: the professional actors in the Section 106 process have complete authority to choose who to include or exclude as a consulting party.

The Section 106 process (as defined in 36 CFR 800) protects the power of the (mostly White) professionals who drive this process, relies extensively on the written word (and obfuscating jargon) for most communication, exemplifies binary thinking (something is or is not eligible for the NR), and the lack of public transparency in the process is an example of paternalism. The actors who have power in the Section 106 process are also highly conflict adverse in order to avoid political situations that are embarrassing; when combined with NEPA (National Environmental Policy Act), however, there is sometimes a greater opportunity to consider the intangible heritage of communities.

Preservation planning protects the power given to its conventionally trained experts or appointed committee members. Laurajane Smith’s (2006) description of the “authorized heritage discourse” that “sidelines” the meanings and values of the public is one manifestation of how this power is exercised. And, as Melissa D. Hargrove (2009, 100) notes, this control often manifests explicitly as “White power”: “There is no mystery in the fact that historic status remains a tool of White power, often ‘preserving’ aspects of one culture (White) at the expense of others (minority).” Preservation professionals (who, again, are usually White; see above) use their regulatory authority to recognize

Consultation failings with the Section 106 (preservation/ environmental review) process

- In Silver Spring, Maryland, the Talbot Avenue Bridge linked two communities: Lyttonsville, which was predominately African American, and Rosemary Hills, which was a White, sundown neighborhood. African Americans would regularly cross the bridge into Rosemary Hills during the day, and return home at night. [When a new light rail line was planned that would potentially impact the bridge](#), the involvement of federal funds required a Section 106 review. The CRM professional, SHPO, and county all determined that the bridge was not sufficiently historic to save; none of the residents of either neighborhood were contacted or involved as consulting parties. When the residents found out about the plans to demolish the bridge, they started a protest movement. Unfortunately, the bridge was not saved, but the communities have continued to collaborate on the interpretation of the African American history associated with the area (Rotenstein 2019).
- [The Section 106 review for the Dakota Access pipeline was botched](#), which included fundamental failures to consult with Native American tribes that were affected; the CRM professional overseeing the work was compromised by a conflict of interest (Horn 2016).
- Thomas King’s (2009) book, *Our Unprotected Heritage: Whitewashing the Destruction of our Cultural and Natural Resources* documents many other Section 106 failings.

and control interventions about heritage that is not their own, including the heritage of people with non-dominant racial or ethnic identities. In preservation policy work, the public's meanings and values can only be considered if they are communicated in the language of preservation doctrine and regulations.

“Public hearings” associated with the designation of local buildings and districts are another example of very limited public participation in which only certain forms of discourse are valid. While these processes consistently provide the public a chance to “comment” (usually for a short period of time, such as 3 minutes), in order for their input to be considered as valid, members of the public must speak in the preservation language of experts (e.g., contributing/noncontributing resources, eligibility criteria). And design review processes usually have no opportunity for public comment, much less public participation.

Sidelining people who can't or don't want to speak in the doctrinal language of preservation policy

- King (2009) documents the necessity of the public to use accepted preservation terminology in Section 106 review processes, including [in his blog](#).
- Sharon Milholland (2010) [describes similar issues](#) with how the language and concepts that are required in the Section 106 review process are incompatible with Native American meanings and values.
- The City of Denver directs that [“the public is strongly encouraged to provide comments that focus on a projects’ consistency with Denver’s Design Guidelines for Denver Landmark Structures & Districts and the character-defining features of the district or designated landmark property.”](#)

Reason 6: Preservation’s relationship to property and White, high-style visual culture

No aspect of historic preservation policy can be divorced from the treatment of property and its ownership; and, in the United States, White people own significantly more property than any other racial or ethnic group. According to [the US Census Bureau](#), in 2019, the White (non-Hispanic) homeownership rate is the highest in the United States at 73.3%, which is about one-third higher than the rate for African American, Latinx, Asian American, and Indigenous home ownership. And, statistical trends indicate that this gap has been increasing over the past decade. Similarly, ownership of business and industrial property is highest among White people. Because of these demographics, preservation policy will tend to benefit White people the most simply because this group owns—by far—the most property in the United States. In addition, all of this property was stolen from the first peoples of North America and, by extension, preservation policy, because of its failure to engage with land repatriation efforts, helps to support settler colonialism (McLean 2020). To be sure, many properties currently owned by White people were also stolen from other, marginalized groups, such as African Americans (Kahrl 2019). Preservation policy fails to take any of these property and social justice issues into account.

While not specific to preservation policy *per se*, media related to all aspects of the preservation enterprise over-emphasizes White, high-style visual culture, and most Americans recognize this

fact. A recent study by Zhao, Nyaupane, and Timothy (2016) shows, with statistically sound, generalizable results, that most Americans characterize historic preservation, including activities supported by policy, primarily as an aesthetically-driven endeavor. This emphasis manifests in photos of monumental buildings, palatial interiors, sumptuous details, elaborate landscaping, and artistic ornamentation. And, in these photos, there are often no people; people, when present, are usually from the distant past and frequently White and wealthy. Images that represent cultural landscapes—especially those associated with non-dominant racial or ethnic identities—are underrepresented. When such images are present, they tend to stereotype certain resources such as the cabins lived in by enslaved people or sharecroppers.

Preservation's visual culture, in addition to emphasizing the dominant social class, may have more direct, psychological impacts on marginalized groups. Environmental psychology research shows that African Americans experience psychological trauma, in comparison to White people, when viewing some kinds of White material culture, such as antebellum plantation houses (Driskell & Trawalter 2021). Similarly, Chase Quinn, [in an article for *The Guardian*](#), explores the parallels between this architectural style and Confederate monuments.

Lastly, White visual culture is also the basis for design guidelines used at the local level by historic preservation commissions in order to issue “certificates of appropriateness” as required by law when an owner makes changes to a property. The guidelines are typically based on the Secretary of the Interior's Standards, which are in turn based on the international Venice Charter of 1964. Thus, while nearly all of these design guidelines were written by White people, they are in turn based on more than a half century of White men's aesthetic judgements. In a case study of Fremont, California, Willow Lung-Amam (2013), a planner specializing in social justice issues, observed that far from being impartial, cities used preservation design guidelines to enforce the dominant, White, perspectives of “good” and “appropriate” design under the guise of preserving neighborhood “character.”

See for yourself how White material culture defines the primary visual identity of historic preservation

- [Google images for the keywords “historic preservation.”](#) Note what you see.
- Look at any printed materials associated with historic preservation advocacy organizations, preservation degree programs, and government agencies' work supporting preservation. You should notice most images are of monumental, high-style buildings associated with White material culture.

Reason 7: Workplace culture that rewards conformity and punishes innovation

Innovation is required in order to address the social justice issues that are inherent to built heritage conservation practice (Gibson, Hendricks, & Wells 2019). But, do the policy environments in which most historic preservationists work support innovation? The answer is troubling.

Research since the 1970s has consistently shown that rigid and dogmatic thinking inhibits creative thinking and stifles innovation. As William Haskins (1996), an expert on employee empowerment, explains, “When people become dogmatic they rarely are open to a discussion of issues, even with themselves [because they] already know the truth. ... They already know the answer, so why waste time discussing the problem or solution with themselves or other organizational members.” Dogmatic thinking is based on defense mechanisms that reject evidence counter to accepted truths

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(Ambrose and Sternberg 2012); when an employee comes to the realization that an element of a preservation law runs counter to known evidence, say from the social sciences, the only acceptable reaction is to reject this evidence, because failure to do so results in the potential of being branded as a trouble-maker in the workplace. Why raise a point that invalidates a portion of an ordinance that must be followed, without fail? These interactions will inevitably be branded as unproductive discussions because the employee feels utterly powerless to go up against not only a law, but a workplace culture that rejects critical thinking about the law.

Because historic preservation practice is mostly driven by the regulatory environment, the job descriptions of employees who work in these areas are also largely defined in a statute, rule, or ordinance. Consider, for instance, that the work of local preservation “planners” is more directly related to building code enforcement than urban planning, the former of which requires the rote application of code versus a more open-ended exploration of ideas. But, more importantly, is there evidence that employees in preservation compliance work in these kinds of dogmatic environments? Unfortunately, as with so much of the preservation workplace, there are no studies upon which to make solid claims. There is some evidence, however, that employees are being told that they are “not paid to think” when creative, outside-of-the-box approaches to their work are attempted (Elliott 2019, 95). From my anecdotal experience I have observed that preservation planners are sometimes afraid that their critique of a regulatory regime may result in retributions from their employer; when such plan-

Preservation policy workplace culture supports White supremacy through:

- **Perfectionism:** Preservation workplaces discourage curiosity and open-mindedness in deference to “just getting the work done.”
- **The means justify the end:** There are insufficient resources to address social justice issues; we “just need to get the work done.”
- **Protection of power:** Preservation leaders have failed to understand how their power, granted through the regulatory system, impacts employees and the public. Too many such leaders become defensive when confronted with social justice issues.
- **Objectivity and measurability:** Preservation workplaces discourage a focus on emotions and feelings related to people’s relationship with the built environment; objectivity is paramount even if it may harm the public.
- **Dominance of the written word:** If an activity is not spelled out in a rule or regulation, then we can’t do it.
- **Binary thinking:** Places are or are not significant/eligible for the NR; a resource has or does not have historical integrity; a resource is or is not contributing; you help buildings or people.
- **Paternalism:** Preservation experts know best about why a place is historically significant and how to preserve this resource’s authenticity/ integrity. The public is ignorant about historic preservation so they need to be taught how to think properly.
- **Fear of open conflict:** Preservation regulations are designed to reduce or eliminate political conflict by short-circuiting public involvement and political discourse. By narrowly focusing preservation work only on what is required by law, politically uncomfortable or embarrassing conflicts are minimized.

ners have presented in conferences I have organized, they fold over their name badges to hide their employer's identity.

Some academic contexts exhibit anti-intellectual tendencies that, in a similar sense, create environments that suppress dissent and innovation (Wells 2020). Preservation scholars who question the status quo are sometimes chastised by their peers for not being “real” preservationists and sidelined; in a number of cases, these scholars choose to leave historic preservation, and instead research and teach in more supportive, but allied programs, such as planning, American studies, or public history. This is another example of binary thinking: the perception that one can either support helping buildings OR people, but taking a balanced approach emphasizing both perspectives is not possible.

Reason 8: Not enough focus on affordable housing and helping lower-income property owners

Studies consistently show that the designation of local historic districts and preservation tax credit projects are associated with an increase in household income and housing costs that might lead to displacement of lower-income households (e.g., McCabe & Ellen 2016; Coulson & Leichenko 2004; Grevstad-Nordbrock & Vojnovic 2019; Been et al. 2016; Kinahan 2019). Most of this work, however, does not support the contention that historic preservation policies (e.g., designation, tax credits) result in less racially or ethnically diverse communities. While displacement is certainly occurring because of lack of affordability, this issue is shared across the entire built environment and not just places targeted for historic preservation activity.

Research in preservation economics inevitably runs into problems with endogeneity bias: it is difficult, if not impossible, to determine if historic preservation policies *cause* neighborhood change or if this change would have happened independently of the preservation policy (Noonan & Krupka 2011; Heintzelman & Altieri 2013). People are more likely to choose areas of a city for historic district designation that have high aesthetic value and monumental buildings; they might also be equally as likely to choose these areas for investment, regardless of historic designation or tax credit availability. Because it is not possible to set up an experiment to control for when an independent variable (e.g., historic preservation) is jointly determined with a dependent (e.g., neighborhood change) variable, the precise relationship between preservation policies and gentrification and displacement will continue to be opaque.

What is clearer, however, among communities associated with non-dominant racial or ethnic identities, is the dominant *perception* that historic preservation is correlated with gentrification, and more importantly, displacement: where there are historic preservation activities, there is a concern that neighborhoods become increasingly White, less diverse, and, especially, less affordable (Noonan & Krupka 2011; Meskell 2019; Weiner 2020). For this reason alone, the historic preservation enterprise needs to center itself as a tool to address the affordable housing crisis, which affects more than just historic areas in the US.

As McCabe and Ellen (2017) and Glaeser (2011) advocate, preservation policy should take responsibility for its role in either reducing or not creating sufficient affordable housing and then do as much as it can to address the problem. In short, whether or not you agree that historic preservation causes affordable housing issues is largely immaterial to this argument: from an ethical perspective, the field needs to place affordable housing—especially increased supply—at the core of everything it does [as should every other field that works in the built environment](#).

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The preservation field also needs to broaden the discussion beyond just the affordability of property and consider this question more holistically, as Willow Lung-Amam advocates: “Affordable means can I not only live here and be able to pay my rent or mortgage, but can I get to my job, can I afford daycare, can I afford the transportation costs? And then, at the end of the day, do I have some money left over?” (qtd. In Simons 2020). The field must start looking at how other costs, such as transportation, childcare, utilities, food, medical care, and self-care, change in response to historic preservation activities. In many ways, this is consistent with the need to shift preservation’s focus from things (buildings) to people.

In addition to the affordable housing crisis, [income inequality is increasing as well](#). While the top income earners in the United States have increasingly been doing better over the past decade, those on the bottom end of the scale have seen their income stagnate or decrease. In addition, the Black-White income gap has increased. Many families in the US have seen their housing cost increase while their income has decreased.

Within this context, let’s examine the federal Rehabilitation Tax Credit (preservation tax credit). This credit represents the largest public expenditure for historic preservation projects in the US. In 2019 alone, this amounted to about [\\$6 billion in taxpayer dollars](#). The majority of these projects rehabbed non-residential, commercial properties and multi-family properties while single-family, residential properties were a smaller portion of the total. In terms of finance, 17% of the projects had a budget under \$250k. In comparison, [a study conducted on Virginia’s state historic preservation tax credit](#) indicated that about 10% of the tax credit projects over the period of 1997 to 2014 had a budget of \$100k or less (accounting for inflation, this percentage would be lower, today). [According to the NPS](#), in 2019, the average preservation tax credit project was \$5.54 million while the median cost of a project was \$1.03 million, which means that there are a small number of very high budget projects that skew the average.

All of this begs the question: On what kinds of buildings does the preservation tax credit focus? While there are no data in terms of architectural style, some useful information can be gleaned from available data on the use and overall budget of the projects. In the US, there are about twice as many single-family investment properties as there are non-residential commercial properties, which means that these former properties are probably under-represented in preservation tax credit work.⁴ And, we already know that while the median budget for a rehab project is not unusually excessive (compared to other real estate investment projects), it is also not within the range of many of the values of smaller, vernacular buildings that comprise much of the built landscape associated with marginalized groups. When considering this information, a case can begin to be made that, compared to the ordinary built environment, tax credit projects seem to be more associated with larger buildings, wealth, and thus, White material culture. And, whether they are representative or not, NPS’s own brochures that promote the preservation tax credit feature large, high style buildings over smaller vernacular ones (see figures 2 and 3). To be sure, more study is warranted on this question, but a trend seems apparent.

⁴ The [US Department of Energy estimates](#) that there are 5.9 million non-residential commercial properties that serve the needs of lodging, health care, public order and safety, food service, mercantile, warehouse and storage, food sales, service public assembly, office, education, and religious worship. [According to Richard Florida](#), Professor at the University of Toronto’s School of Cities and Rotman School of Management, there are 12 million single-family investment properties in the US.

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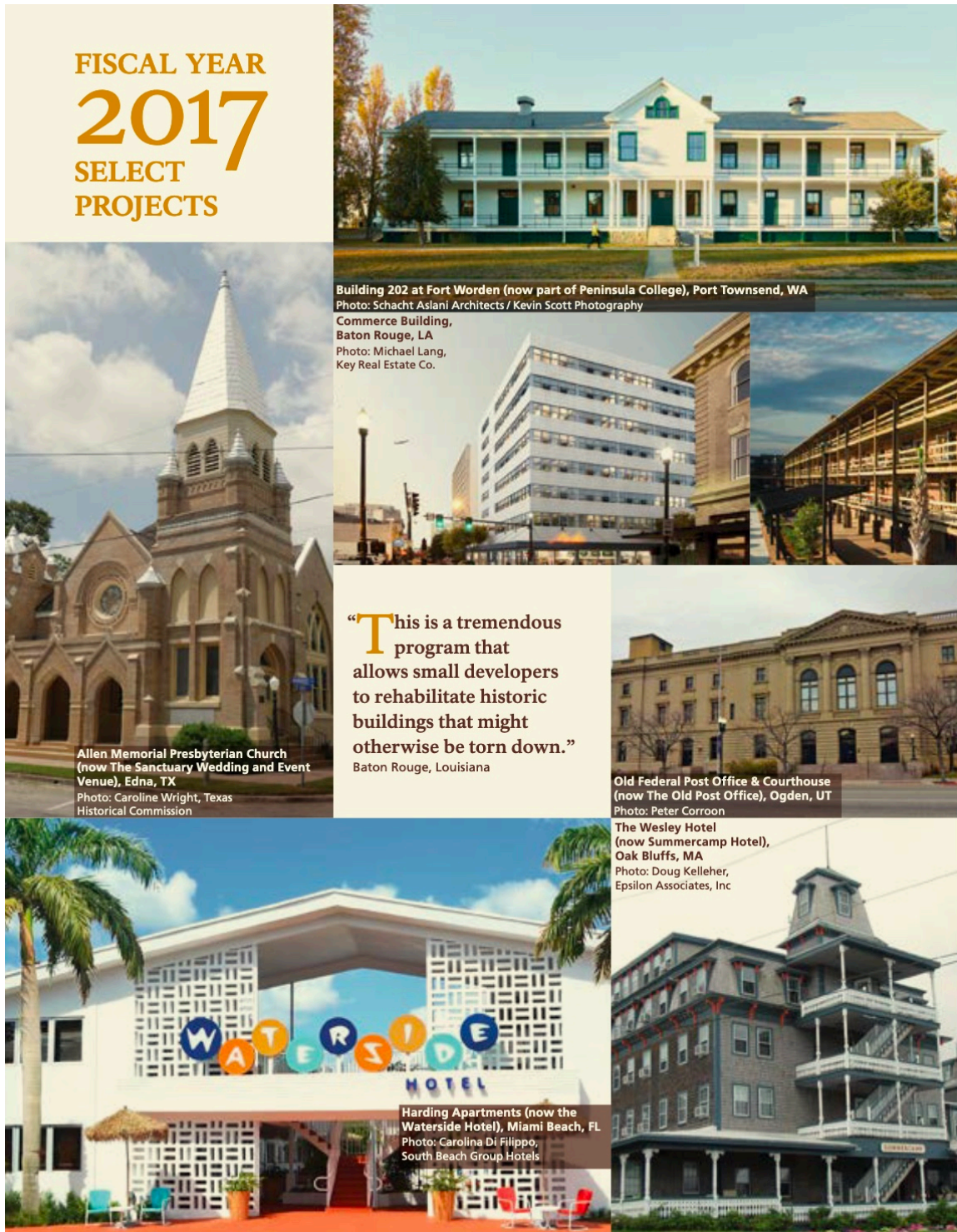


Figure 2. Buildings featured in the National Park Service’s 2017 annual report on the federal Rehabilitation Tax Credit. Of note is that none of these buildings represent the history of marginalized groups. (From [Federal Tax Incentives for Rehabilitating Historic Buildings: Annual Report for Fiscal Year 2017](#) by the US National Park Service.)

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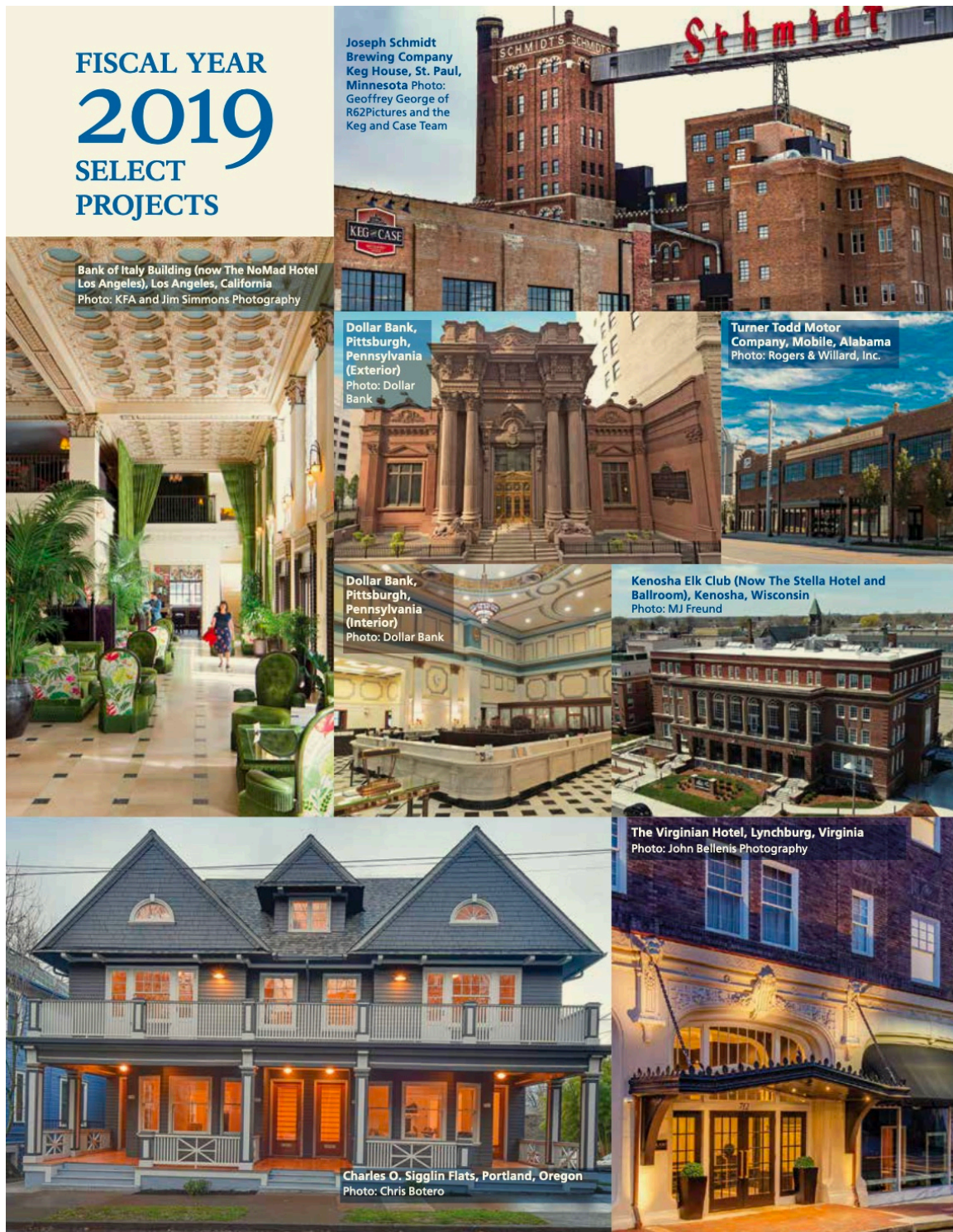


Figure 3. Buildings featured in the National Park Service's 2019 annual report on the federal Rehabilitation Tax Credit. Of note is that none of these buildings represent the history of marginalized groups. (From [Federal Tax Incentives for Rehabilitating Historic Buildings: Annual Report for Fiscal Year 2019](#) by the US National Park Service.)

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Another important and related question is who are the people using these tax credits? Again, these data do not appear to readily exist, so some suppositions need to be drawn on what we do know. Given that it is difficult to attract outside equity on a tax credit project that does not exceed about \$5 million, it is reasonable to assume that most of these projects were financed directly by the property owner. While such investors are not likely to represent very large, and wealthy, entities (such as REITs), the amount of these investments are beyond the capabilities of most small businesses and individuals. Real estate finance requires significant capital and the ability to assume a great deal of risk, often through short-term, high interest loans. In particular, the rehabilitation of existing buildings is notoriously more risky than other types of business ventures, which is a primary reason that new construction is easier to finance. Building and zoning codes are also biased against rehabilitation adding additional uncertainty to the process. As with any investment, wealth and thus stability tend to correlate with a greater ability to assume risk.

But, in the United States, as with personal wealth, [business wealth is over-represented by White-owned enterprises](#). A case in point are businesses owned by African American women, which [comprise about 35% of all such businesses](#) in the US. These businesses earned nearly six times *less* net revenue than similar businesses owned by White women (American Express 2019). Critically, African American business owners are much less likely to have access to capital than White business owners in all forms, including small business loans and credit cards. On average, 80.2% of White-owned businesses receive loans they've requested versus only 66.4% of businesses owned by people with non-dominant racial or ethnic identities. When these businesses do receive funding, it is about \$30,000 less than similar White-owned businesses and the interest charged is about 1.4% higher (Goldschein 2021). Moreover, 37.9% of African American business owners believe that they are discouraged from applying for loans versus 12.7% of White business owners (ibid.). Lastly, 59% of White business owners report that they receive assistance from loan officers to help complete a loan application versus only 18% of African American business owners (ibid.). It is little wonder [more African American small business owners use cash](#) to start a new business than do White business owners. In sum, for many of these reasons, individuals who utilize the preservation tax credit are much more likely to be White and the stakeholders who benefit from such credits are more likely to be more wealthy (and White) as I will explain.

Lower income families and individuals benefit, to some extent, from preservation tax credits through a trickle-down process. The most obvious example is when these projects increase the availability of affordable housing, especially when paired with the federal Low-Income Housing Tax Credit. According to a study by Rutgers University, from 1977 to 2016, historic preservation tax credit projects resulted in the rehabilitation of 549,005 housing units; 50% of these units were newly created housing units (Center for Urban Policy Research 2017). 153,255 of the total units (28%) were affordable housing (usually created by pairing preservation and low-income housing tax credits), although the study did not report how many of these units were newly created. For reference, as of 2017, there was a shortage of about 8 million units of affordable housing in the United States (Aurand et al. 2017). In the 39 years referenced in the Rutgers study, the preservation tax credit produced less than 2% of the number of units currently needed; assuming that some of these units were already affordable housing, this number is even less, perhaps substantially so. This is a proverbial drop in the bucket.

Most critical for communities associated with non-dominant racial or ethnic identities, however, is that the federal preservation tax credit does nothing to directly help lower-income property

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owners—business or residential. The main issue is that the federal credit can only be used on income-producing properties. The other issue is that these households are unlikely to have the kind of liquidity needed to pay for house repairs/upgrades out of pocket, and then wait for the credit. But, this liquidity problem also impacts the income-producing properties of small business owners; in many cases, the kind of minor repairs that are needed (e.g., roof repair, repainting) would not exceed the adjusted basis of the building, as required by law.

Of course, a number of states do allow homeowners to take advantage of a state historic preservation tax credit. But, using the tax credit still requires homeowners to have large amounts of liquidity in order to initially fund rehabilitation work, and as represented from [Virginia's example](#), these homeowners are more wealthy. For lower-income individuals, this is simply not possible, so it doesn't get used in this context. Again, grants would be far more usable for these kinds of property owners.

In sum, the financial benefits for historic preservation were designed by wealthy White men (first in 1977, revised in the early 1980s) to benefit people who are already wealthy, and are highly likely to be White. In all of this discussion, it is also important to point out that all preservation tax credits – federal and state – require the use of the Secretary of the Interior's Standards, which, as detailed elsewhere in this document, is a White supremacist regulation based on White supremacist doctrine.

To be sure, another way to increase the number of affordable housing units is through new construction. And the most effective way to increase the number of any kind of housing unit is through densification, including accessory dwelling units. But, the problem is that historic preservation has long been used by White communities as a tool to preserve single family zoning. In addition to preventing densification, the origins of single-family zoning are rooted in racism and exclusion (Manville, Monkkonen, & Lens 2020), which are factors that influence the motivation of White homeowners in their use of historic preservation as a tool to stop densification.

But, this kind of landscape change is incompatible with historic preservation theory and practice, which renders such changes as an affront to retaining the integrity of historic neighborhoods. There are many examples of savvy, White, wealthy homeowners who use historic preservation as an excuse to prevent the densification of their neighborhoods.

The way in which the historic preservation enterprise fails to support the increase in affordable housing—either in ways that are empirically substantiated or in ways that the public perceives—is an example of the means justify the end: while beautiful, historic urban landscapes are preserved and downtowns are revitalized, communities associated with non-dominant racial or ethnic identities lose access to affordable housing. There is little discussion of affordable housing in the preservation field, especially compared to other built environment disciplines.

Preservation policy as a tool for wealthy, White NIMBYism

- [“Historic Preservation: NIMBYism for the Rich?”](#) by Joe Cortright (*City Commentary*).
- [“True historic preservation would respect the homes of poor people, too”](#) by Michael Andersen (*Open Housing*).

Perceptions that preservation policy sustains problems with housing affordability

What is important about the opinion pieces, below, is not necessarily if they are true or correct, but rather they are evidence of the *perception* about how historic preservation and affordable housing are at odds with each other:

- “[How Discussions of 'Neighborhood Character' Reinforce Structural Racism](#)” by Gretchen Brown (*Rewire*).
- “[When Historic Preservation Clashes with Housing Affordability](#)” by Dan Bertolet (*Sightline Institute*).

Reason 9: There are no voices from people with non-dominant racial or ethnic identities in preservation doctrine, rules, regulations, and guidelines

The innate values of historic preservation expertise are encoded in its accepted doctrine, which represents the field’s accepted theory and philosophy. Doctrine is fundamentally important in how students are educated and it underpins every single preservation regulation. Critically, there are no voices from people with non-dominant racial or ethnic identities in preservation doctrine or the regulations that drive three-quarters of the preservation enterprise in the US. Some authors, such as Kenyatta McLean (2020), note that in addition to supporting White supremacy, orthodox preservation doctrine and regulations also sustain and continue to justify colonialist ideals, especially settler colonialism and its history of property theft.

Every preservation student learns of the founding White fathers of preservation doctrine, such as John Ruskin, Eugène Viollet-le-Duc, William Sumner Appleton, Charles Peterson, and James Marston Fitch, among many others. But, usually absent from the curriculum is that many of preservation’s founders were racists. Most disciplines are based on the ideas of racist White men, such as [environmental conservation](#), so preservation is not unique. This aspect of the history of historic preservation is important as it helps to explain how the field’s values supports the connoisseurship of White material culture in the present.

For instance, John Ruskin vigorously defended slavery in the nineteenth century using the same religious fervor he used to support the preservation of Gothic cathedrals (Arthur 2001). William Sumner Appleton was a eugenicist who used historic sites associated with northern Europeans to “prove” that White culture was superior to others (Lindgren 1996). And Albert Rains, a racist congressman who was instrumental in helping pass the National Historic Preservation Act, vigorously supported segregation and the annihilation of Native Americans while opposing public school integration; Rains saw preservation as a tool for supporting Southern White supremacy (Haeuser 2018). There are many other examples, including some that likely still remain to be discovered.

An open question that historical research needs to more firmly address is the degree to which historic preservation arose as a tool to express northern European cultural supremacy over other groups, especially during an era of intensive immigration. There are many clues in existing historical research, but reframing the origins of historic preservation in this way opens a new understanding of the racist and political origins of the field.

The racist, founding fathers of environmental conservation

While there is evidence that some of the White men who created the foundations for historic preservation policy held racist and White supremacist views, there has been little or no discussion, especially in the popular press, about this history and its relation to preservation policy today. The field of environmental conservation, however, is engaging in this kind of debate on their founding fathers:

- [“American Environmentalism’s Racist Roots Have Shaped Global Thinking about Conservation”](#) by Prakash Kashwan (*The Conversation*).
- [“Environmentalism’s Racist History”](#) by Jedediah Purdy (*New Yorker*).
- [“Sierra Club Grapples with Founder John Muir’s Racism”](#) by Alex Fox (*Smithsonian Magazine*).

This emphasis on aristocratic White men from the nineteenth and early twentieth centuries in the consideration of ways to change the preservation field is problematic, however. While this is a natural direction, given that orthodox doctrine, policy, and specific regulations are justified through these founding fathers of preservation, such debates are necessarily grounded in White logic (as defined at the beginning of this paper): namely the assumption that the ideas of the founding fathers of preservation are inherently objective. Beginning a discussion from this grounding then assumes that the meanings and values from people associated with non-dominant racial or ethnic identities are inherently inferior. What if, instead, one took the position that the founding fathers of preservation were not inherently objective, but rather that their viewpoints, as a product of their historical sociocultural and economic context, were inherently biased and subjective—indeed, more biased and subjective than the contemporary perspectives of people with non-dominant identities? This is an example of a process that could be used to decolonize preservation theory and center the voices of people with non-dominant racial or ethnic identities in its work.

These questions are fundamentally important when we begin to look at the preservation rules and regulations that drive most practice in the US, because they were all authored by White experts (e.g., architects, archaeologists, historians) who were predominantly men: The National Historic Preservation Act, Secretary of the Interior’s Standards, the National Register and its associated criteria, the Rehabilitation Tax Credit, and Section 106 review. And most local preservation ordinances (about 80%, according to Erica Avrami et al. [2018]) are more or less repeating federal regulations at the local level.

The Secretary of the Interior’s Standards is the international Venice Charter of 1964 written for a US context (Hudgins 2012). The Venice Charter was written by White people (mostly men), which in turn was based on the 1931 Athens Charter that was written by White men. The Athens Charter was in turn based on the Society for the Protection of Ancient Building’s 1877 Manifesto, also written by White men.

What we have in US preservation law is a literal preservation of the state of thinking in the 1960s. Because preservation laws have not been substantially updated in a half-century, they preserve a racist past. When we uncritically teach students about the preservation doctrine that underpins these laws, we perpetuate a system based in White supremacy.

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It is important to note that while US preservation law was frozen in the mid-twentieth century, the rest of the (Western) world went on developing more enlightened doctrines that began to incorporate the perspectives of people with non-dominant racial or ethnic identities (including non-Western perspectives) on heritage, people, and places. One of the most important examples is the international Nara Document on Authenticity (1994), which if incorporated in US preservation laws, today, would address many of the problems in US preservation practice. The reason why this doctrine is so important is because it allows for authenticity (in US practice, historical integrity) to be defined in non-material terms. The Australian Burra Charter (originally written in 1979, and updated many times since), if implemented in US preservation law, would result in the elimination of period of significance and the acceptance of ethnographic research methods in creating a non-fact-based NR nomination (or determination of NR eligibility).

The lack of evolution of US preservation law is a social justice issue and needs to be recognized as such.

The failure of US historic preservation degree programs to universally *require* students to learn about and critically interpret international preservation/conservation doctrine is indefensible because it supports White supremacy. Many of the authors of these later (post Venice Charter) doctrines are people of color, often from non-Western cultures.

The issues around the lack of voices from people with non-dominant racial or ethnic identities in preservation represent the following characteristics of White supremacist culture:

- Justifying a means to an end: Time after time, arguments by leaders in the field are that changing preservation rules and regulations is too political, too time consuming, or will take too many resources. Leaders in preservation degree programs cite issues with not enough space in the curriculum to teach international doctrines or that there are few qualified individuals to teach in this area.
- Protection of power: The continual direction of evolving international preservation doctrine is to support bottom-up, grass roots efforts at historic preservation. Unfortunately, this is often perceived as a threat to conventional experts in the field (loss of power) rather than an opportunity to enact social justice.
- Objectivity and measurability: Post-Venice Charter preservation doctrine emphasizes qualitative meanings and subjective, non-measurable methods for engaging in preservation work.
- Dominance of the written word: Later doctrine, like the Burra Charter, normalizes oral history and ethnographic methods based on oral communication, music, dance, drawing, etc.
- Paternalism and fear of open conflict: The National Park Service and the Advisory Council on Historic Preservation have long been complacent about the current state of the field and have shown little or no interest in addressing White supremacy in preservation rules and regulations. Doing so would mean making these processes more transparent and accessible to the public and would likely generate conflict through necessary political processes.
- Progress defined as continual expansion: The field's measure of success is through its rules and regulations is too dependent on measures of how many buildings were rehabilitated and how many listings were added to the NR. Broader, social measures of success are needed.

Reason 10: Funding to address issues of preservation policy's support of White supremacy is nearly entirely absent

Nearly all funding for historic preservation work, in the form of grants, credits, etc., is for bricks and mortar work or to support the designation of historic places. Given the field's object of attention, this made perfect sense in 1970s, but today the funders of research and innovation in practice in historic preservation need to move into other areas, including:


- Addressing any of the issues described in this article;
- Work in the social sciences, or action/participatory research;
- Community engagement;
- Policy analyses;
- Engagement with international colleagues to support innovation in the field;
- Competitive awards for graduate students who have theses or dissertations that will advance knowledge of places important to people with non-dominant racial or ethnic identities or advance preservation policy.

I would encourage funders who traditionally work in the area of social justice and social policies to consider funding this kind of transformative research in historic preservation.

Now that I have explored 10 reasons why historic preservation policy supports White supremacy, how might these issues be addressed? I will now present 10 ideas to end preservation policy's support of White supremacy, informed by this context.

10 IDEAS TO END PRESERVATION POLICY'S SUPPORT OF WHITE SUPREMACY


These ideas are primarily intended to empower people who work or volunteer in the preservation field to take action where they are able, but could also inform any policy-related changes made by preservation advocates, including those individuals charged with legislative or rule-making endeavors. These ideas, while informed by others, represent my perspective on the field. For this reason, the ideas presented here are not meant to be an all-inclusive or definitive list of solutions. I present these ideas primarily to start a discussion of how policy change might happen in the field. Others will likely have better and more refined solutions; my contribution is to simply start the discussion.

 **Engage in political and policy action.** (Idea 1) The NPS and ACHP have, for the past fifty years, been widely acknowledged as the historic preservation policy leaders in the US, even at the local level. They must engage the public in a discussion on how their policies promote White supremacy with the objective of rule and overall policy changes. Contact your congressional representatives and encourage them to hold the NPS and ACHP accountable for their leadership role. Contact members in the [Historic Preservation Caucus](#) and help them understand the importance of this endeavor. Contact your city council members and help them understand these issues; encourage them to introduce revised/new ordinances. If you have a leadership role in government, support policy change.

Policy action

Through public pressure, on July 15, 2020, the San Francisco Historic Preservation Commission adopted [Resolution No. 1127](#) “centering Preservation Planning on racial and social equity,” which is [fully supported by the San Francisco Planning Commission](#).

The national preservation framework, encapsulated in the National Historic Preservation Act of 1966, arose from grassroots political advocacy, and as such, represented the values and meanings associated with the White, dominant group. This context is important, because today, grassroots advocacy continues to drive legislation, including topics addressing historic preservation (Bruhn, Howard, & Paxton 2009), and as such, the interests of the White, dominant group tend to be emphasized and protected over other groups. For this reason, it is important to learn about the political process for enacting laws at the local, state, and federal levels, and which groups/people have the most influence in these processes. There are many useful grassroots organizing guides for political change, such as Jeffrey Stout's [Grassroots Democracy in America](#) (2013), to which I will direct the reader.

 **Empower histories and places associated with non-dominant racial or ethnic identities.** (Idea 2) Be part of the process of normalizing the use of oral histories as a way to center the preservation story in specific communities, especially when these stories intersect with rules and regulations. It is also important to recognize that members of these communities have agency to document and understand their own histories. Look to other fields, such as folklore, for how this has worked successfully (Magat 2016).

Consider publishing your research in places that are more accepting of oral history and ethnographic methods than the NR as a model for which policy makers can be inspired. Publicize your efforts widely; involve communities associated with non-dominant racial or ethnic identities in

Empowering histories

- Andrea Roberts from Texas A&M University created the [Texas Freedom Colonies Project](#) to assure African American history is on policy agendas and at the center of Texas history. Her work uses oral histories and community-based participatory methods to “make freedom colonies more visible to those who can influence their chances of survival.”
- [BlackSpace developed a community toolkit](#) to help African American residents of Brownsville, Brooklyn to engage in neighborhood conservation. This toolkit emphasizes gathering and understanding the shared, lived experiences of this neighborhood’s residents.

documenting/discovering/interpreting their own heritage as much as possible. Go beyond regulatory requirements for public participation; encourage grass-roots efforts. Listen and facilitate more; use your authority less; be especially wary of paternalistic arguments from authority. Support/develop programs in which communities associated with non-dominant identities can learn about the Section 106 process, especially ways to have their voices included in mitigation proposals.



Put people before place. (Idea 3) As an endeavor that fundamentally benefits the public, preservation policy should be envisioned as how places should serve the needs of people and not as how people should serve the needs of places. Part of this vision includes how work in the field can contribute to cultural continuity through a focus on intangible heritage.

People before place

[UNESCO’s Historic Urban Landscape approach](#) “moves beyond the preservation of the physical environment and focuses on the entire human environment.” Pilot cities, such as [Ballarat, Australia](#) have successfully used this approach to re-envision what built heritage conservation can be when it is more people-centered.



Recruit employees, volunteers, and students that represent non-dominant racial or ethnic identities. (Idea 4) Every preservation-related organization, especially those charged with implementing preservation policy, should prioritize recruiting people with non-dominant racial or ethnic identities. Consider funding volunteers associated with this group to make participation easier. Part of this endeavor should recognize how White supremacy manifests in the workplace with associated work to proactively address the identified issues. Respect the agency of people with non-dominant racial or ethnic identities to choose areas of focus for history/heritage research, independently of their own culture, ethnicity, and race.

Preservation degree programs should prioritize recruiting students from non-dominant racial or ethnic groups, including funding these students, while realizing that not making fundamental changes to remove White supremacy from their curricula will impair the success of this endeavor. These programs need to make systemic changes to their curriculum to recognize and address White supremacy or else these efforts will largely be wasted. Programs that focus on community engagement, housing affordability, and the role of the built environment in fostering health, identity, and justice will likely be more successful.

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Recruitment efforts should begin with an organization's or program's self-assessment of the kind of messages that it may intentionally or unintentionally be sending its potential recruits. Is there any possibility that these messages might be reinforcing White supremacy in some way, especially from a semiotic (visual message) perspective (see reason 7)? Are inclusion and diversity issues addressed in a token fashion (see reason 1) or are they systemic throughout all of the organization's/program's work? Does the organization/program exhibit critical self-reflexivity in relation to racism and White supremacy? If your organization/program has no answers to these questions or has never bothered to ask them, then it may become all too easy to "blame the victim" (see Ferber 2013, 584-585): the false conclusion that your organization/program lacks diversity because of some failing on the part of people with non-dominant racial or ethnic identities and not a failing of your organization/program. This perspective is insidious because it provides justification to avoid accountability for how your organization/program perpetuates its support of White supremacy.

Recruiting individuals with non-dominant identities

- The National Trust for Historic Preservation's [Mildred Colodny Diversity Scholarship](#) provides students from marginalized racial, ethnic, and sexual/gender groups funds to help study historic preservation.
- The National Trust for Historic Preservation created the [Hands-On Preservation Experience \(HOPE\) Crew](#) to train young people in preservation crafts. The Trust specifically focused on the recruitment of people with non-dominant racial or ethnic identities youth to support an "inclusive, multifaceted preservation movement that represents the full range of American experience."
- The [ARCUS Leadership Program Fellowship](#) focuses on "understanding and developing an inclusive and antiracist approach to cultural heritage work."



Be flexible with arguments for historical integrity. (Idea 5) Become more accepting of integrity arguments that don't seek unattainable standards for unaltered fabric and allow more of these arguments to focus on "feeling" and "association." If you are a preservation leader with power, normalize this approach within your organization. Push back against others when they disagree with your approach; help them understand how this perpetuates White supremacy in the field.

Integrity flexibility

Thomas King has extensively written [in his books](#) and [in his blog](#) about ways to satisfy the regulatory requirements of historic preservation less dogmatic, including arguments for historical integrity.



Promote an inclusive visual culture of historic preservation and support land repatriation efforts. (Idea 6) Resist efforts to conflate historic preservation with images of high style buildings associated with wealth and White men in your brochures, publications, and web site. Help to foster a visual culture of historic preservation that is, instead, inclusive of places important to people with non-dominant racial or ethnic identities; include photographs of people in places. Avoid using

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stereotypical depictions of buildings, landscapes, and people/groups associated with specific racial and/or ethnic identities. Engage in dialogs about land repatriation, especially in how these efforts overlap with preservation policy.

Normalizing an inclusive visual culture and land repatriation discussions

- Materials produced by [Latinos in Heritage Conservation](#) promote visuals that celebrate Latinx people and their culture.
- Ellis and Perry (2020) explore how to [treat indigenous knowledge as an equal to Western science](#) to inform preservation policies that support land repatriation.



Reward innovation and critical thinking in your policy-based preservation organization. (Idea 7) Normalize respectful conflict which is a required part of this process. Provide space and time for employees to think and innovate. Recognize and allow the agency of people with non-dominant racial or ethnic identities to flourish both within your organization and in the communities and constituencies you serve. Encourage an open dialog about the problems of White supremacy in the field. Make changes! No one should feel threatened in his/her/their workplace for speaking truth to power.

Rewarding innovation and critical thinking

The Pacific Science Center, a non-profit museum, officially [encourages its employees to engage in “curiosity and critical thinking”](#) to support anti-racism in its workplace and in the implementation of its mission.



Focus on affordable housing policy. (Idea 8) Focus your organization’s efforts on ways that preservation policy can support increasing affordable housing, including more flexible thinking about allowing densification. Because housing security is linked to environmental justice, there is an unrealized, catalytic opportunity in allying with affordable housing organizations such as the [Citizens’ Housing & Planning Association](#) and the [National Low Income Housing Coalition](#).

Affordable housing policy

Although listing the local Pilsen Landmark District, a Latinx majority neighborhood, failed, it is one of the first times that [proponents of local historic district designation promised policy changes](#) focusing on improving affordable housing contingent with preservation work in the neighborhood.



Center the voices of people with non-dominant racial or ethnic identities in preservation doctrine. (Idea 9) If you are associated with an educational institution, make sure that people with non-dominant racial or ethnic identities voices are the core of the history, theory, and philosophy of preservation you teach. Look to and require non-Western contexts for authors and ideas. Sideline orthodox, White male preservation doctrine; present this doctrine as history and not as received wisdom from the past that must justify what we do in the present. Hire and nurture teachers with non-dominant racial or ethnic identities; teach little known historical events, in which people with non-

dominant identities played a leading/important role, and that are a fundamental part of American history.

Increasing the diversity of voices in preservation doctrine

- The preservation programs at [Columbia University](#) and the [University of Pennsylvania](#), led by Erica Avrami and Randall Mason, respectively, created public bibliographies that focus on authors with non-dominant identities and their ideas.
- In 2020-21, a number of virtual conferences/ symposia featured authorities associated with non-dominant identities including the “Deconstructing Preservation Conference” organized by Sarah Marsom, “Beyond Allyship: Advocating for Latinx Heritage” session organized by Latinos for Heritage Conservation, and “Re-Centering the Margins: Justice and Equity in Historic Preservation” organized by Michelle Magalong.



Create, promote, and use funding to address these issues. (Idea 10) If your organization supports preservation funding (e.g., grants), prioritize funding that will help to address how preservation policy supports White supremacy. Encourage other organizations with allied interests in the built environment to do the same.

Policy funding

The National Trust for Historic Preservation’s [African American Cultural Heritage Action Fund](#) program provides organizations with funding for work that overlaps with policy and racial inclusion, equity, and justice.

IN CONCLUSION, HOW TO USE, AND NOT USE, THIS PAPER

Beyond contributing to the understanding of how preservation policy supports White supremacy, how can this paper be relevant and useful to the social challenges in the second decade of the twenty-first century? The answer is that the issues and potential directions outlined here should embolden educators and policy makers and implementers to make needed changes. The platform outlined in this paper represents the perspective of about fifty or so diverse individuals who work or teach in historic preservation and this, alone, should lend some credence to the weight of the issues and the need for them to be addressed.

To be clear, however, my first recommendation is to not use this paper unless you have no other choice. I view this paper as a temporary stopgap until other, more relevant voices than mine join this space. Look to where preservationists with non-dominant racial or ethnic identities are discussing, presenting, and publishing their work. Listen and understand and from this understanding, make changes. As the diversity of people who work and research in the policy-driven areas of historic preservation increases, there will be publications from these authors that will be more relevant than this paper. Look for these publications and read them. In other words, do what is right and just, on many levels, to make this paper irrelevant.

Follow what advocacy organizations are doing, read their materials, and attend their conferences. Some organizations that are discussing and addressing social justice issues in historic preservation include:

- Latinos in Heritage Conservation (<https://www.latinoheritage.us/>)
- Asian & Pacific Islander Americans in Historic Preservation (<https://www.apiahip.org/>)
- Black in Historic Preservation (@BlackInHistPres – Twitter and Instagram)
- The Society of Black Archaeologists (<https://www.societyofblackarchaeologists.com/>)

For now, however, my hope is that this paper can be used as a tool to catalyze needed change in preservation policy and education. There are several social justice scenarios that I have outlined in table 1 to provide some examples of how the ideas in this paper could be used. Again, I want to emphasize that these are just suggestions and far from the only possibilities; my intent is to support a critical, thoughtful, and respectful discussion that leads to change. In many workplaces, even bringing up the question, “how does our work support White supremacy?” is impossible. A paper like this might just, hopefully, crack the door open so that it is acceptable to ask a question like this, leading to an exploration of resolutions to the problems that are identified.

Finally, even in light of the social justice issues I have presented, I am not pessimistic about the future of historic preservation; rather, I am emboldened by today’s social justice context that is moving the field toward a long needed, people-focused center. I have spent the past two-decades, though my research, practice, and advocacy, in moving the bar in this direction, and for the first time, discussions on enabling this people-centered focus appear to be on the verge of becoming normalized. Change, however, will take time, but it can no longer be ignored. We must accept that historic preservation will likely evolve into something that may be quite different than today. This is a bright future we should boldly embrace with confidence.

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Table 1. Social justice scenarios, what is at stake, and potential solutions.

Claim	What is at stake (reason[s] to dispute claim)	Potential ideas
Our organization/policy doesn't support White supremacy/is not racist because we have (late-ly) nominated/listed lots of buildings/places to the local/national register associated with diverse racial and ethnic groups.	Implies that the only issue is a lack of representation on historical registers; as this paper outlines, there are many more systemic issues. This kind of statement supports tokenism and is dismissive of the larger social justice issues in the field. (Any of the 10 reasons.)	Any of the 10 ideas.
We can solve most of our lack of diversity and inclusion issues by nominating buildings/places associated with diverse racial and ethnic groups to the local/national register.	See above.	See above.
Our preservation policy isn't racist/doesn't support White supremacy.	Claim ignores the historical genesis of preservation policy and who created it. Also trivializes issues around how archival research has been normalized in policy. (Reasons 2, 3, 9.)	Ideas 2, 3, 5, 6, 7, 8, 9.
We must save this (racist) monument to educate people in the future.	Claim privileges the voice of the few who have power; ignores the inherent social injustice in retaining monuments whose intent was to suppress marginalized peoples; monuments do not "educate." (Reasons 2, 5.)	Ideas 2, 3, 7.
If African American, Latinx, Indigenous, Asian American (...) people really care about their built heritage/places, they would show up to our meetings.	Claim does not consider the fact that planning processes are biased against marginalized groups; claim also assumes that there is only one way for people to recognize/protect their heritage—i.e., through official preservation policy and regulations. (Reason 5.)	Ideas 2, 3.
It's not your job to solve the social ills of the world. Just do your job as it's written in the regulation/ordinance.	A fundamental characteristic of workplaces that support White supremacy is the suppression of dissent/conflict; everyone needs to participate in policy change for social justice reasons. (Reason 7.)	Ideas 4, 7.
It's not our job, per the policy/ regulation, to consider how designation will impact non-property owners or economically marginalized owners.	Preservation policy benefits property owners with means while ignoring the economically marginalized and those who do not own property. (Reason 8.)	Ideas 7, 8.
You're not taking the fabric/integrity/ authenticity of this building/place seriously enough: Are you a "real" preservationist?	Preservation policy serves the needs of buildings/places first and then people; inverse is needed to address social justice issues. (Reasons 4, 6, 8, 9.)	Ideas 3, 7.
Our historic preservation education curriculum doesn't support White supremacy.	Teaching orthodox preservation policy cannot be divorced from its support of White supremacy. (All 10 reasons.)	All 10 ideas.
We want a just world, but we only fund the designation of properties/bricks and mortar work; policy is not our focus.	Preservation policy is the locus of social justice issues in the field. Focusing on only on fabric and/or designation perpetuates social justice issues. (All 10 reasons.)	Idea 10.
We need to educate people who aren't White about the "value of preservation."	Perspective forces people with non-dominant racial or ethnic identities to adopt White supremacist doctrine/policy and fails to recognize the agency of these individuals in defining their own heritage and processes. (Reasons 2, 3, 4, 5, 6, 7, 8, 9.)	Ideas 2, 3, 5, 6, 7, 8, 9.

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