

Rep. Tsongas (H.R. 10970)
additional comments for the record of the
Subcommittee on National Parks and Insular Affairs

Designation as a National Park

The Lowell Historic Canal District Commission has found that creation of a National Park is the appropriate means to preserve and interpret the industrial revolution, as symbolized in Lowell, for the benefit of the nation. I am pleased and gratified that the Department of Interior concurs in this finding. There is, by now, no doubt that Lowell is the best place in the country to vividly portray the manifest effects of industrialization on American life.

However, I do not agree with the changes in the plan which the National Park Service has presented to this Committee. Alternative management structures for the park and alternative development configurations were explored in depth over the last two years, with extensive input from citizens as well as state, local and federal agencies. All of the options suggested by the National Park Service have been previously considered, documented, and rejected. The Park Service was actively represented during this process. To raise such options without the extensive consultation which characterized the work of the Lowell Historic Canal District Commission contradicts the type of planning the type of planning process which Congress envisioned when it created the Commission. Furthermore, if the Park Service radically alters the plan, all those agencies -- state, local, and private -- who have concurred with the current plan as reported by the Commission will feel that much of the positive momentum of the last two years will be lost.

Why did the plan take its present form?

The plan is a direct result of the unique nature of the resource represented in Lowell --

1) The resource is not connected with famous people or political events. It is, rather, the embodiment of an era, a change in the American way of life by the development of industry and the creation of an industrial society. This idea cannot be illustrated in a few isolated historic structures, but is reflected in the city-scope of Lowell, and the interrelationship of buildings and spaces to cultural mores and activities.

2) The physical nature of the resource is unusual, and without precedent for the Park Service. The millions of square feet of mills and the community infrastructure of a 19th century community pose unique problems.

First, the extent of buildings is vast; they are not well-suited to traditional fee acquisition approaches to preservation. A way must be found to engage the maximum participation of the private sector in preservation, through adaptive reuse. The plan selects areas and buildings which can maximize this process.

Second, the essence of understanding the resource is the interrelationship of the many types of natural features, buildings, canals and structures, which symbolizes the cultural development of industrial society. The plan is concentrated in an area of the city where these relationships can be seen.

Third, because the resource is the city, the park must be developed sensitively. It should not disrupt normal urban activities.

It should encourage intensive visitor use within discrete areas. It must be physically manageable and inviting to the prospective visitor. The intensive use zone of the plan, with two key mills and many other structures which portray an understandable cross-section of 19th century Lowell, has been designated to meet these needs.

3) Park management in such an urban area cannot be traditional. The plan includes a balanced and carefully crafted package of physical development actions and management mechanisms. The intensive use zone has been designed to include those sites and structures critical to visitor interpretation and use, without the need for major property acquisition. Other significant resources, where direct involvement of the Secretary is not likely to be essential, have been included in the park boundary, but with a different management mechanism. The proposed federal commission is an integral part of the park plan. It offers an inter-governmental mechanism to protect the preservation zone which includes significant historical resources. The Commission -- because of its structure and its independent funding -- would be able to encourage preservation and to control the quality of development in this zone. The Commission, as a special purpose, representative entity, is far better suited to discharge these than a federal, local, or state agency. Alternates to this approach were considered, and were discussed in detail with federal, state, and local agencies. The Lowell Historic Canal District Commission considered alternative approaches to these functions and concluded that --

- 1) the entity could not simply be advisory;
- 2) state or local sponsorship was not feasible or desirable;
- 3) existing mechanisms were inadequate.

The Federal Commission offers the distinct advantages of --

- 1) centralizing administrative reporting through the Secretary of the Interior;

- 2) limiting Park Service involvement to those functions for which the agency is best equipped; and

- 3) broadening the participatory base for planning and implementation.