

POSITION PAPER

Appropriate records

The United States has documented its historic buildings continuously since 1933, under a statutory duty, in the largest architectural archive in the world. That documentation records what was built. It does not record how it was built, and no federal program does. This paper sets out the evidence for that claim, identifies the exact point at which the narrowing occurs, and shows that the narrowing is administrative rather than statutory.

In short. Federal law requires that "appropriate records" be made of historic properties before they are substantially altered or demolished. Neither the statute nor the Secretary of the Interior's Standards defines those records as a record of fabric. The restriction to fabric is made one level further down, in program guidelines, and one program — the engineering record — has already departed from it. What is missing is therefore reachable by amendment rather than by legislation.

What is recorded

The Historic American Buildings Survey began in 1933. With its later companions for engineering and landscape, it holds more than five hundred and eighty thousand measured drawings, large-format photographs and written histories, covering in excess of forty-three thousand structures, deposited at the Library of Congress and free to the public. It is federally mandated, professionally staffed, ninety-three years old, and by any measure a success at what it sets out to do.

What it sets out to do is recorded in its own guidance. The Survey's guidelines for historical reports direct the documenter to the "physical aspects of the building, complex of buildings, or site," and describe the written material as existing to supplement the measured drawings and photographs. On the people who made the thing, the outline asks for one item: the construction firm or the source of the building materials. Who built it, and where the stone came from.

It never asks how the stone was worked. A measured drawing will give coursing, joint dimensions, stone sizes and wall sections — the evidence of method frozen in its result. The inference from that evidence back to the method belongs to the reader; the record does not carry it. After ninety-three years, the sequence in which a wall was built, the tools used on it, the cues the mason read and the judgments made are nowhere in the archive.

The exception, and its limits

The engineering record is different, and the difference is instructive. Its outline format for manufacturing and industrial sites requires a part titled Operations and Process, covering the processes that created the end product, the machines and technology used, the workers, and the product itself. The guidance calls this a critical part of the report. Its format for engineering structures separately requires information on how a structure was constructed and what construction techniques were used.

So a federal documentation program already records making, where its own guidance compels it. In practice the yield for stone is patchy and must be checked record by record, and it reaches only extraction and fabrication — the quarry face, the sawing mill, the tool works. **Wall-building on site, the mason's own work of laying and jointing, is absent from the buildings record, the engineering record and the landscape record alike.**

THE EVIDENCE

What each federal source carries

A survey was made of the federal publications that might reasonably be expected to hold craft method in one trade, stonemasonry, chosen because it is among the trades the published condition assessment measures and because its literature is comparatively well developed. The results are set out below. Every source named is a work of the United States Government and carries no copyright.

Source	What it carries
Conservation Treatment for Period Masonry, Unified Facilities Guide Specification 04 03 00 (2025)	The most operationally precise federal document located. Repointing, in-situ retooling, dutchman repair, crack injection; mortar consistency, lift depths, curing cycles. Written as a specification binding a contractor, not as a record of how any individual works.
Preservation Brief 2, Repointing Mortar Joints in Historic Masonry Buildings (1998)	Mix proportions, cutting depth and geometry, a ranked order of tools, lift sequence, tooling timing and the visible signs that it is wrong, curing schedule, failure modes. The densest federal guidance on historic pointing, and directed at repair.
Concrete and Masonry, TM 3-34.44 / FM 5-428 (2012, 1998)	Approximately three pages on rubble stonework — bedding, bonding-stone frequency, sighting by eye against building to a line, and the instruction to lift a stone clear rather than slide it back. The only federal source located that describes laying stone at all.
Studies of Stone-Setting Mortars, Building Materials and Structures Report 139 (1953)	Laboratory evidence that bond in vertical joints is weaker and more variable than in horizontal ones. Not method: the measured reason behind a rule masons had followed by habit.
Builder 3 & 2, NAVEDTRA 14043 (1993)	Opens by observing that masonry was originally the art of building from stone, then covers concrete block and brick and contains no stone masonry section at all.
National Guidelines for Apprenticeship Standards, masonry occupations (2013)	Names the covered occupations and allocates hours to categories. Carries no technique. Developed by a private industry body and registered by the Department of Labor rather than authored by it.
Historic Preservation Training Center and the Traditional Trades Advancement Program	The place where the federal government still teaches these trades. No public curriculum or training manual was located. The knowledge is transmitted hand to hand and is absent from the documentary record.

The pattern is consistent. Where federal method exists it is written to bind a contractor performing a repair, or to instruct a soldier building a field structure. Neither form records what a particular practitioner knows. A specification states the outcome required and the tolerance permitted; it does not state how a person who can achieve that outcome does so, and it is not written down by anyone who can.

Five gaps

Extending the survey to published literature outside copyright — works of the United States Government, and works published in 1930 or earlier — leaves five areas in which no source of any kind was located.

- **Tool preparation.** The best published English manual names more than sixty hand tools and what each is for. No source found describes how a mason sharpens or tempers one, to what geometry, or how a tool signals that it is going. This is the first thing an apprentice learns and the first thing lost.
- **Laying cut stone.** Repair is documented thoroughly and rubble work briefly. The setting of ashlar as craft — sequence, sighting, the decisions made on the wall — appears nowhere.

- **The federal curriculum.** The Historic Preservation Training Center publishes nothing. The strongest evidence for this register's premise is that the government's own craft knowledge is undocumented.
- **Contemporary practice.** The most recent English-language manual located that records hand method rather than specification was published in 1929. Nothing comparable has been published since, in or out of copyright.
- **The moment of judgment.** Every source consulted states what to do. None records how a practitioner knows which thing to do, which is the knowledge that does not survive its holder.

A guild that wrote everything except the craft

One body of documents is routinely assumed to hold what the rest does not. It does not, and the way in which it does not is the clearest available statement of the problem.

The Constitutions of the Free-Masons, published in 1723, runs to some two hundred thousand characters. It contains no occurrence of the words mortar, chisel, quarry, dressing, bedding, banker, scaffold, plumb or trowel. Its single mallet appears in a foundation-stone ceremony. The Regius Poem of about 1390 and the Cooke Manuscript of about 1450, the oldest documents the tradition holds, consist of apprenticeship terms, wage rules, conduct toward the master and the lodge, dispute resolution, and a legendary descent of the craft. The closest either comes to a technical statement is a prohibition on working at night, which is a labor regulation.

The usual account is that craft secrets were later spiritualized. The evidence says the technique was never in these documents at all. A guild that wrote down its wage scales, its apprenticeship terms and its claim to antiquity, and kept writing them for six centuries, never wrote down how to cut a stone. The institution survived. The method did not, and it did not survive precisely because the institution never treated it as the thing to record.

WHERE THE NARROWING HAPPENS

The statute does not say fabric

Federal agencies are required, where a historic property is to be substantially altered or demolished as a result of an agency action, to ensure that appropriate records are made and deposited in the Library of Congress. That duty sits at 54 U.S.C. §306103, carried forward from section 110(b) of the National Historic Preservation Act. Section 106 of the same Act, at 54 U.S.C. §306108, is the process by which an adverse effect is identified, and documentation is routinely stipulated as its mitigation in a memorandum or programmatic agreement.

The statute does not define appropriate records. It names no medium, no subject matter and no level of detail.

The definition is supplied by the Secretary of the Interior's Standards for Architectural and Engineering Documentation, published at 68 Federal Register 43159 on July 21, 2003, superseding the version published at 48 Federal Register 44730 on September 29, 1983. There are four Standards. Documentation shall adequately explain and illustrate the significance of the property; shall be prepared accurately from reliable sources with limitations stated so that it can be independently verified; shall be on durable, reproducible materials in standard sizes; and shall be clearly and concisely produced.

None of the four excludes a record of method. The first is the only one that reaches subject matter at all, and it speaks of significance, which is not a synonym for fabric. The accompanying guidance then illustrates significance by reference to drawings and photographs, and the program guidelines below it fix the content — the outline that asks for the builder's name and the source of the stone and stops there.

Level	Instrument	What it does
Statute	54 U.S.C. §§306103, 306108	Requires appropriate records. Defines nothing further. Amendment requires an Act of Congress.
Standards	68 Fed. Reg. 43159 (2003)	Four standards of adequacy, accuracy, durability and clarity. None restricts subject matter to fabric. Amendment is by the Secretary, through notice in the Federal Register.
Guidelines	Program outline formats	Fix what is actually recorded. This is where the restriction to fabric is made — and where the engineering record has already departed from it by mandating a process narrative. Amendment is administrative.

What an amendment would say

The change required is narrow and has precedent inside the same programs. Where documentation is stipulated as mitigation, and the property embodies a craft practice assessed as at risk, the record would include an account of method obtained from a practitioner holding it: the sequence, the tools and their preparation, the cues read, the failure modes and the conditional judgment. The engineering record already requires an equivalent for industrial process, in the same archive, under the same Standards, reviewed by the same offices.

The cost is not the obstacle. A method record obtained from a living practitioner is a fraction of the cost of the measured drawings already produced for the same property, and the mitigation budget already exists. The obstacle is that nobody has written down what such a record should contain, to a depth at which a later practitioner could work from it, or demonstrated that it can be obtained at a cost a working shop can carry.

That is the gap this register exists to close, and closing it is a precondition of the amendment rather than a consequence of it. A specification that has never been tested is not a specification an agency can adopt. The published Standard and the conformance trial conducted under it are directed at exactly this: establishing, on the record and including the failures, whether a method record meeting a stated depth test can be produced at a stated cost.

What is claimed and what is not

- **Claimed.** The federal documentary record of historic property is a record of fabric, not of method, and the restriction is administrative rather than statutory.
- **Claimed.** No published source, federal or out of copyright, was located that records the preparation of hand tools, the laying of cut stone as craft, or the moment of judgment in any of the trades surveyed.
- **Not claimed.** That the existing programs are deficient at their own purpose. They are not. The measured drawing is the correct instrument for recording fabric and has no substitute.
- **Not claimed.** That a survey of one trade establishes the position in every trade. It does not, and the survey is published in full so that it can be re-run and contradicted.
- **Not claimed.** That the amendment described is imminent, agreed, or under consideration by any agency. It is not. It is the path this analysis indicates, stated so that it can be argued with.

Root & Branch Register Inc. · Position paper, September 2026. Sources are cited in the accompanying survey, which lists every publication consulted, the assessment made of each, and the copyright status of each. Statutory and regulatory citations are given so that they may be checked; nothing in this paper is legal advice. The condition assessment referred to is published separately, together with the rule by which it is computed, so that any party may re-run it against the same federal sources and reach the same result.