

National Park Service
U.S. Department of the Interior
National Historic Landmarks Program



NHL BULLETIN

GUIDELINES FOR PREPARING NATIONAL HISTORIC LANDMARK NOMINATIONS



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Medgar and Myrlie Evers House,
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NHL BULLETIN

GUIDELINES FOR PREPARING NATIONAL HISTORIC LANDMARK NOMINATIONS

WASHINGTON, DC:
U.S. DEPARTMENT OF THE INTERIOR
NATIONAL HISTORIC LANDMARKS PROGRAM
NATIONAL PARK SERVICE

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**STABLER-LEADBEATER APOTHECARY
SHOP, ALEXANDRIA, VIRGINIA**
(DESIGNATED JANUARY 13, 2021)

This remarkably intact building conveys the history of drug stores in the United States and the evolving role of pharmacists in the 19th and early 20th centuries. NPS IMAGE BY ANNA FRAME, OCTOBER 2016

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**SPACE ENVIRONMENT SIMULATION
LABORATORY, CHAMBERS A AND B,
HOUSTON, TEXAS**

(DESIGNATED OCTOBER 3, 1985)

Constructed in 1965, the laboratory was designed, built, and used for thermal-vacuum testing for all US-manned spacecraft during the Apollo-era programs. The laboratory's two chambers, along with instrumentation and data systems and support facilities, are housed in Building 32 at the Lyndon B. Johnson Space Center. NPS IMAGE BY BILL STANFORD AND LAUREN HARNETT, APRIL 2013



ACKNOWLEDGMENTS

The National Park Service, in cooperation with the National Conference of State Historic Preservation Officers (NCHSPO), prepared this update to the 1999 publication *National Register Bulletin: How to Prepare National Historic Landmark Nominations*. NCSHPO administered the contracts for this project through a cooperative agreement with the National Park Service; the work was prepared for and conducted under the guidance of National Historic Landmarks (NHL) Program staff.

Dr. James (Jamie) Jacobs, consultant and former NHL Program Historian, was the primary author of the updated NHL bulletin, with contributions from Dr. Adam Fracchia, archeologist; Judith Cox, consultant, prepared its design and layout. Christopher Hetzel, former NHL Program Manager, and Caridad de la Vega, former NHL Program Historian, directed and coordinated this work, and assisted in its editing. The program guidelines also reflect many comments and suggestions provided by National Park Service and NHL Program staff, including select members of the NHL Landmarks Committee. Dr. Lisa Pfueller Davidson, NHL Program Manager, directed final editing and completion, with assistance from NHL program staff Patty Henry, Dr. Evelyn Causey, Dr. Astrid Liverman, Dr. Michael Roller, and Sherry A. Frear, Chief National Register and National Historic Landmarks Programs and Deputy Keeper of the National Register.

Special thanks are extended to former members of the NHL Landmarks Committee, who served in an advisory capacity during the update project and regularly reviewed and offered feedback on the document in the course of its development. These individuals (and their affiliations while serving as advisors) are: Dr. James M. Allan, RPA, Principal, William Self Associates, and Adjunct Professor, Anthropology Department, St. Mary's College of California; Mary Hopkins, State Historic Preservation Officer, Wyoming; Luis Hoyos, AIA, Assistant Professor of Architecture and Urban Design, California State Polytechnic University-Pomona; and David Young, Executive Director, Delaware Historical Society. We would also like to recognize the contributions of Paul Loether, former Chief of the National Register and National Historic Landmarks Programs and Keeper of the National Register, and Dr. Stephen Pitti, Professor of History & American Studies at Yale University.

PREFACE

FOR OVER SIXTY YEARS, THE NATIONAL HISTORIC LANDMARKS (NHL) PROGRAM HAS RECOGNIZED NATIONALLY SIGNIFICANT HISTORIC PLACES THAT ARE AMONG THE MOST IMPORTANT IN THE UNITED STATES FOR TELLING THE STORIES OF THE NATION'S DIVERSE PAST. NHLs are properties designated for their relationship to specific themes and contexts in American history. They also reflect the values, aspirations, priorities, and biases of the era in which their identification, nomination, and designation occurred.

Many people mistakenly perceive history as a fixed progression of events, trends, and people that are locked in time or are somehow unchanging. In reality, the study of history is dynamic and ever-changing. As more is learned about the past, previously unstudied and understudied events, trends, people, and places in history are discovered. Some of these may be completely new, while others are already known, but have been neglected, misunderstood, or sometimes purposely ignored. The discovery (or rediscovery) of this past often leads to new historical investigations and reconsideration of old interpretations. Known history is expanded and reassessed based on uncovered information, novel methodologies, and/or a changed cultural outlook.

As an endeavor that links physical places with history, the NHL Program has not been immune to shifts in historical study. The NHL Program, like many other local, state, national, and international listing and designation programs, has experienced challenges in the recognition, understanding, and documentation of nationally significant places that represent the stories of all Americans. NHL designations not only document history, but also the history of history, known as historiography. The history encapsulated in these designations has exhibited greater inclusivity over time, yet the challenge remains to further identify and document places that reflect the complexity and diversity of the American experience. This work may also include updating nominations for previously designated properties to better document the untold histories of these NHLs.

The preparation of this updated *National Historic Landmarks Bulletin* is one of the tangible outcomes of increased interest in evaluating the scope, process, and purpose of the NHL Program to overcome this challenge. In recent years, the NPS conducted meetings, panels, workshops, and other opportunities for wider public comment. In 2015-16, the NHL Program, working in conjunction with the National Historic Landmarks Committee of the National Park System Advisory Board, hosted a series of workshops, meetings, and listening sessions covering all aspects of the NHL Program and the designation process. Referred to as "Multiple Voices," these sessions gathered academics, professionals, and NPS staff to discuss

**OLD UNITED STATES MINT,
SAN FRANCISCO, CALIFORNIA**

(DESIGNATED JULY 4, 1961)

Constructed between 1869 and 1874, this monumental granite-and-sandstone-faced Greek Revival building quickly became the principal mint in the country, as well as the federal depot for silver and gold. Designed by Alfred B. Mullett, it is one of the few downtown buildings that survived San Francisco's 1906 earthquake and fire. Its use as a mint ceased in 1937. The building was threatened with demolition in 1969 but was preserved and is still owned by the federal government. NPS/HABS
IMAGE, WILLIAM S. RICCO, 1958



perceptions of the NHL Program and strategies for its future. They addressed a range of ideas to increase transparency, collaboration, openness, and inclusion.

A proposed update to the existing *National Register Bulletin: How to Prepare National Historic Landmark Nominations* (1999), the core guidance for understanding NHLs and the process by which they are identified, nominated, and designated, was one of the outcomes of these gatherings. The NHL Program initiated an effort to revise the Bulletin in early 2017. It invited groups and individuals to share specific ideas about the update during a two-month public comment period from March to May of that year, followed by a two-day workshop, during which the NHL Committee and NHL Program staff discussed the goals for the update. Active revision of the NHL Bulletin began in mid-2017.

The planning and preparation for the Bulletin update took into account five primary factors, which had (and continue to have) a direct bearing on the published guidance:

- Federal regulations governing the NHL Program and NHL designation;
- input received about the direction, activities, and outlook of the NHL Program;
- the existing *NHL Bulletin* (1999) and best practices of the NHL Program;
- the recently revised NHL nomination form; and
- alignment with the National Register of Historic Places

The completed publication—now called *NHL Bulletin: Guidelines for Preparing National Historic Landmarks Nominations*—offers an introduction to the NHL Program and is a detailed primer for understanding the key features and definitions of NHLs and the nomination process. More important, it is intended to explain how NHLs are uniquely able to tell the nationally significant stories of all Americans.

CHAPTER 1

INTRODUCTION

National Historic Landmarks (NHLs) are nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value in illustrating, interpreting, or commemorating the history of the United States. Acknowledged to be among the nation's most important historic places, these buildings, sites, structures, objects, and districts adeptly communicate nationally significant themes and contexts in history, archeology, architecture, engineering, and culture.

NHLs can be found throughout the United States, its territories, and in US-affiliated Pacific Island nations. They are individually owned by private citizens, organizations, corporations, tribal entities, or federal, state, or local governments. They are associated with nationally significant persons, places, events, or patterns that represent the panorama of the American experience and contribute to understanding the nation as a whole. These persons, places, events, and patterns may not all be familiar to everyone, but their nationally significant stories *should* be known to each and every American. The designation of NHLs works toward this goal. As of 2022, over 2,600 historic places bear the distinction of NHL designation.

The National Park Service is the nominating authority for NHLs and the designation process is administered by the NHL Program. The program's professional staff of historians, archeologists, architectural historians, and other cultural resource specialists work with individuals, groups, institutions, and agencies throughout the country to guide them through the nomination process for new NHLs and to provide assistance for existing ones. NHL Program staff serves as the first point of contact for anyone seeking information about NHLs and the designation process, and continues to provide technical assistance after an NHL is designated.

**LIGHTFOOT MILL,
CHESTER COUNTY, PENNSYLVANIA**

(DESIGNATED APRIL 5, 2005)

Lightfoot Mill represents an extremely rare archetypal example of a small eighteenth-century custom grain mill with its surviving, completely intact, power transmission system. The basic technology of this mill dates from the mid-eighteenth century, adapted to make use of several of the automating inventions of the famous American inventor, Oliver Evans. NPS IMAGE BY JOHN SPRINKLE, OCTOBER 2004





**DENVER & RIO GRANDE RAILROAD
SAN JUAN EXTENSION (CUMBRES &
TOLTEC SCENIC RAILROAD), CONEJOS
AND ARCHULETA COUNTIES, COLORADO
& RIO ARriba COUNTY, NEW MEXICO**
(DESIGNATED OCTOBER 16, 2012)

This 64-mile segment of narrow-gauge railroad built to open the central Rocky Mountain region to development is the country's longest and most complete example of this late nineteenth-early twentieth century railroading technology. It is also representative of general American railroad practice of the first quarter of the twentieth century. NPS IMAGE BY ROGER HOGAN, 2010

BASIC DEFINITIONS

What does it mean for a place to possess exceptional value in illustrating, interpreting, or commemorating the history and prehistory of the United States? These and similar terms are found throughout the regulations that govern the NHL Program and the NHL designation process. These regulations can be found in the *Code of Federal Regulations* (CFR) at 36 CFR Part 65. Although some have multiple, nuanced meanings, the intended use of these terms in the NHL regulations is relatively clear using standard dictionary definitions:

ILLUSTRATE: to make clear or evident by means of examples, or to show clearly or to demonstrate.

INTERPRET: to render clear or explicit or to explain or tell the meaning of.

COMMEMORATE: to preserve the remembrance of or to call to remembrance.

The term “convey” is not included in the federal regulations, but is widely used in historic preservation practice as shorthand for illustrate, interpret, and/or commemorate.

“Exceptional value” is another qualifier found in the federal regulations, in reference to the NHL process—one that heightens expectations. A property considered for NHL designation is regarded as exceptional (that is, special or superior) relative to other properties in its value or utility in illustrating, interpreting,

or commemorating an event, association, person, type, or style. An NHL, then, is designated because of its particular ability to clearly explain, demonstrate, or preserve the memory of nationally significant themes, contexts, events, and individuals in American history.

The function of this publication *NHL Bulletin: Guidelines for Preparing National Historic Landmark Nominations (NHL Bulletin)* is to provide guidance in applying these concepts to the designation of nationally significant properties as NHLs. The NHL guidelines offer broad coverage of the character and meaning of NHLs, the background and purpose of the NHL Program, and the steps and requirements in the NHL Process. While based in federal regulations, the NHL guidelines—along with other guidance documents regularly prepared, updated, and distributed by the NHL Program and the related National Register of Historic Places (National Register)—provide practical how-to information for members of the public and experienced preservation professionals.

**BRADBURY BUILDING,
LOS ANGELES, CALIFORNIA**

(DESIGNATED MAY 5, 1977)

Completed in 1893, this unique five-story office building was designed by George H. Wyman, who had no formal architectural or engineering training at the time. The heavy sandstone exterior leaves one unprepared for the cage of light-filled glass within; the whole is a cobweb of cast iron covered with delicate Art Nouveau ornamentation. NPS IMAGE BY MARVIN RAND, N.D.



QUALITATIVE FRAMEWORK

The *NHL Bulletin* explains the conceptual foundations and values of the NHL Program and provides practical help for preparing an NHL nomination, including discussing in detail how to effectively craft an NHL nomination's three principal components:

NATIONAL SIGNIFICANCE: a strong, evidence-based case for national significance under one or more of the NHL Criteria (see Chapter 4: National Significance);

HIGH DEGREE OF INTEGRITY: a well-reasoned assessment that the property retains a high degree of integrity of location, design, setting, materials, workmanship, feeling, and association (see Chapter 6: High Degree of Integrity); and

COMPARATIVE ANALYSIS: a thorough and thoughtfully developed comparative analysis that situates the nominated property relative to other similar properties and supports the property's exceptional value in illustrating or interpreting the heritage of the United States (see Chapter 8: Comparative Analysis).

These components correlate with three conditions identified in the *Code of Federal Regulations* at 36 CFR § 65.4 that must be met for a property to achieve NHL designation. The three components—national significance, high degree of integrity, and comparative analysis—are interrelated and, according to the federal regulations, collectively “define significance,” but are not intended to “set a rigid standard for quality.” Together, the three conditions comprise what the Federal regulations refer to as the “qualitative framework.” The qualitative framework is a flexible method used to evaluate a property's qualifications for NHL designation. The way that the three components relate to each other varies and is distinct for each property considered. This relationship anticipates the wide range of resources considered for potential NHL designation and is one of the principal characteristics that formally set NHLs apart from other federal listing and designation programs.

The qualitative framework takes into account information about a specific property and its nationally significant history, obtained through research and evaluation. As a place-based program, the property's physical existence as a district, site, building, structure, and/or object permits the consideration and recognition of its national significance. The argument for national significance in turn informs how and whether the property maintains a high degree of integrity. The comparative analysis of similar properties evaluates whether the nominated property is among the best to convey a nationally significant theme, context, or topic in history, considering both the significance and integrity. For clarity and convenience, each of the qualitative framework's three parts are individually explored in chapters of this *NHL Bulletin*; yet they should be treated as mutually dependent components in making an informed case for NHL designation.

THE BENEFITS OF NHL DESIGNATION

The designation of an NHL confers the highest level of federal recognition for a historic place. Through the nomination, stories of nationally important historic events, places, persons, and groups are acknowledged, documented, interpreted, and preserved for the future benefit of all Americans. Additionally, NHL designation provides the stewards of a property with a number of benefits.

NHL PLAQUE

Upon designation, NHL owners are offered a bronze plaque for public display to prominently mark the place as an NHL. Plaques typically include the property's name, year of designation, and a brief statement about its significance. These are available at no cost to the owner and are arranged through NHL Program staff in the regional NPS offices.

SECTIONS 106 AND 110(F) OF THE NATIONAL HISTORIC PRESERVATION ACT (NHPA)

Section 106 of the NHPA stipulates that projects or other actions funded, licensed, permitted, or otherwise initiated by federal agencies “shall take into account the effect” of such actions on historic properties listed in or eligible for listing in the National Register, which includes all NHLs. This accounting involves consultation with the Advisory Council on Historic Preservation (the agency responsible for administering Section 106), the State Historic Preservation Officer (SHPO), Native American tribes, local governments, and others with an interest in the property. As noted by the Advisory Council on Historic Preservation, “Section 106 review encourages, but does not mandate, preservation.”¹

Steps in the Section 106 process include the identification and evaluation of historic properties that may be affected by a federal action, assessment of any potential effects, and resolution of any adverse effects that would occur. At times, this review may result in modifications to a project to avoid, minimize, or mitigate possible harm to a historic property. At others, the review may conclude that negative impacts to a historic place are unavoidable, and mitigation is negotiated to provide a balanced public benefit. Mitigation in such cases usually involves some level of documentation of the property prior to its alteration or removal. Section 106, and its implementing regulations at 36 § 800, contains provisions for citizen input through public and tribal consultation. In other words, these decisions are intended to be made with public participation.

Section 110(f) of the NHPA mandates that federal agencies shall “to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking.”² During this process a federal agency “shall request the [Advisory] Council to participate in any consultation” and “notify the Secretary [of the Interior] of any consultation...and invite the Secretary to participate.” The Advisory Council may also request a report from the Secretary under Section 213 of the NHPA to aid in the process. The point of contact for NHPA consultation involving NHLs is usually NHL staff in a NPS regional office.



**PLAQUE FOR SIXTY-NINTH REGIMENT
ARMORY, NEW YORK, NEW YORK**
(DESIGNATED JUNE 19, 1996)

The bronze plaque for the Sixty-Ninth Regiment Armory NHL bears the property's name and its year of designation, including text on the property's significance. NPS IMAGE BY CARIDAD DE LA VEGA, OCTOBER 2019

**SHERIDAN INN,
SHERIDAN, WYOMING**

(DESIGNATED JANUARY 29, 1964)

Constructed by the Chicago, Burlington and Quincy Railroad, the Sheridan Inn opened in 1893 and immediately became the social center of the Big Horn country, representing the taming of the "Wild West." William F. ("Buffalo Bill") Cody operated it from 1894 to 1896, adding barns and livery stables to accommodate big game hunters, who were the inn's primary clientele.

NPS IMAGE BY ROGER REED, JULY 2012

GRANTS, TAX CREDITS, AND OTHER INCENTIVES

Public entities and private organizations sometimes offer grants, loans, or other financial enticements to help fund bricks-and-mortar projects aimed at maintaining the historic character of NHLs. Listing in the National Register or designation as an NHL is often necessary to obtain these financial resources. Property owners should check with their SHPO to learn about the availability and eligibility requirements for historic preservation funding sources.

PRESERVATION AND STEWARDSHIP

NHLs are widely recognized throughout the United States as places worthy of preservation because of their national significance. With this in mind, the NHL Program appreciates the value and necessity of up-to-date information about NHLs for the continued care and preservation by owners, stewards, preservation partners, and other stakeholders. NHL Program staff will occasionally contact owners about the physical condition of their properties and may also ask for permission to visit. The NHL Program staff is also available to provide non-binding advice to individual owners about how to apply the Secretary of the Interior's Standards for the Treatment of Historic Properties (SOI Standards) when planning alterations to an NHL.

In addition, the NPS provides assistance to owners and stewards of historic properties through its Technical Preservation Services (TPS) program. TPS is the nation's leading provider of technical information and guidance on the care of historic properties. The program publishes and updates a series of preservation briefs addressing a wide range of topics related to historic preservation and



**THOMAS VIADUCT, BALTIMORE &
OHIO RAILROAD, BALTIMORE AND
HOWARD COUNTIES, MARYLAND**
(DESIGNATED JANUARY 28, 1964)

Spanning the Patapsco River and Patapsco Valley between Relay and Elkridge, Maryland, this viaduct is the world's oldest multiple-stone-arched railroad bridge and is also the first multi-span masonry railroad bridge in the United States to be built on a curving alignment. NPS IMAGE BY WILLIAM EDMUND BARRETT, 1970



the care and rehabilitation of historic buildings, including information about Historic Preservation Tax Incentives. The National Park Service's National Center for Preservation Technology and Training (NCPTT) also offers a wide range of workshops, and serves as an information clearinghouse on important preservation topics.

VISIBILITY THROUGH THE TELLING OF NATIONALLY SIGNIFICANT STORIES

NHLs are among the most identifiable historic places in the United States, and hold one of the nation's highest levels of historic recognition. They are often cited as the best representations of American history and are commonly the first places people associate with a historic person, event, or topic. These associations often prompt a desire to visit, making NHLs a key component of heritage tourism, which is a popular activity for travellers in the United States. Travel publications often feature NHLs and local and state convention and tourism bureaus frequently highlight publicly accessible NHLs as a reason to visit a particular locale. In addition, many institutions and organizations utilize NHLs in their educational outreach materials and publications.

The NPS features NHLs in many of its travel and education-based programs. NHLs, for example, are highlighted in the NPS Office of Interpretation and Education's Teaching with Historic Places (TwHP) program, a resource used by K-12 educators, colleges, and universities to teach history through historic resources, and in the NPS's Travel Itinerary Series, which highlights designated historic properties to encourage people to learn about and visit these important and inspiring places. More broadly, NHL designation is a minimum threshold for placement on the US World Heritage Tentative List, from which properties are nominated to be inscribed on the World Heritage List by the United Nations Educational, Scientific, and Cultural Organization (UNESCO). UNESCO World Heritage sites are also popular travel destinations.

THE LIMITS OF NHL DESIGNATION

NHL designation has little to no effect on the ownership, use, and care of a property.

OWNERSHIP

A property designated as an NHL does not become the property of the federal government. Fewer than 400 of the over 2,600 NHLs are owned by various federal government agencies, and of these nearly all were in government ownership at the time of their designation. If the sole private owner or a majority of multiple private owners object to a potential NHL designation during the nomination process, the Secretary of the Interior cannot designate the property.

USE AND INTERPRETATION

NHL designation does not confer any rights to the government over how a property is used and does not require that a property be made open to the public. The majority of NHLs are privately owned and individual owners decide whether to welcome visitors and, if so, under what circumstances. Although NHL designation is based on a property's nationally significant context(s), owners of NHLs are also not required to interpret their property in a particular manner or to limit interpretation to only those aspects of history documented in the NHL nomination.

ALTERATION AND DEMOLITION

NHL designation does not protect a property from neglect, alteration, or demolition. A higher standard of care is only required in cases where an NHL is federally owned or a project affecting an NHL is subject to review under Section 106 or 110(f) of the NHPA because of federal involvement. Even then, despite these regulations, it is still possible that an NHL could be altered or demolished. While the NPS encourages owners of historic properties to refer to the Secretary of the Interior's (SOI) Standards as part of any planned alterations, they are under no requirement to follow this guidance. Absent federal involvement in a project, property owners are free to treat their properties in any manner they wish, within the bounds of local and state laws. Nevertheless, it is important to remember that changes that result in loss of a property's integrity and its ability to convey its national significance could result in the withdrawal of NHL designation (See Chapter 7: Withdrawal of NHL Designation for more information).

Alterations to and/or demolition of NHLs are governed primarily by local and sometimes state preservation laws and policies. Federal agencies that own NHLs must avoid and minimize adverse effects, per Section 106 and Section 110(f) of the NHPA, and must follow SOI Standards in the maintenance and modification of NHL properties. Private owners should be aware of state and local laws that might limit their ability to make changes to their designated properties, depending on the jurisdiction. It is recommended that an owner contact their SHPO and/or regional NHL Program staff before proceeding with any proposed alterations to an NHL, including a relocation.

**BRADDOCK CARNEGIE LIBRARY,
BRADDOCK, PENNSYLVANIA**
(DESIGNATED MARCH 2, 2012)

Between 1888 and 1919, steel industrialist Andrew Carnegie funded the building of more than sixteen hundred public libraries. Built 1888–89, and enlarged in 1893, the Braddock Carnegie Library was the first one he funded in the United States. Located near Carnegie's first great steel mill, it provided an opportunity for primarily immigrant workers and their families to obtain intellectual enrichment in this working-class suburb of Pittsburgh. NPS IMAGE BY ROGER REED, OCTOBER 2011



CHAPTER 2

HISTORY

NEWPORT HISTORIC DISTRICT, NEWPORT, RHODE ISLAND (DESIGNATED OCTOBER 18, 1968)

From ca. 1740 until the Revolution, Newport flourished as a port and mercantile center and as Rhode Island's colonial capital. The district's Georgian public buildings and mansions are among the most stylistically advanced of any erected in colonial America, but rows of small dwellings and shops give the area its primary architectural identity. NPS IMAGE BY NED CONNORS, SEPTEMBER 2012



The NHL Program, originally called the Historic Sites Survey, was authorized by the Historic Sites Act of 1935, one of the earliest efforts to establish a nationwide system for historic preservation in the United States. Congress enacted the Historic Sites Act as part of the New Deal, promoted by President Franklin D. Roosevelt and his administration, which acknowledged the inherent worth of American culture and the need for its preservation. Within the NPS, the Historic Sites Act strengthened the agency's mission to document, educate, interpret, and collaborate with others in interpreting the nation's history.

The Historic Sites Act was a clear statement of the federal government's role and responsibility to current and future generations of Americans in the identification, documentation, and preservation of historic places. The legislation directed the NPS to "make a survey of historic and archaeologic sites, buildings, and objects for the purpose of determining which possess exceptional value as commemorating or illustrating the history of the United States"—the core of today's NHL Program.¹ It also called for "necessary investigations and researches in the United States relating to particular sites, buildings, or objects to obtain true and accurate historical and archaeological facts and information concerning the same."²

To this end, the Historic Sites Act established an "Advisory Board on National Parks, Historic Sites, Buildings, and Monuments," now known as the "National Park System Advisory Board" (Advisory Board). Originally composed of a group of "conservation-minded individuals" (e.g., academics, museum curators, archivists, etc.), its members counseled the NPS at a time when the field of historic preservation was a nascent concept and few precedents existed for how the Historic Sites Act should be implemented. (See Chapter 3 for information about the current Advisory Board).³

World War II and its immediate aftermath curtailed the work of NPS historians on the Historic Sites Survey, temporarily shutting down the program. Ronald F. Lee, a historian and later Assistant Director who spent over three decades with the NPS, was the motivating force behind its reactivation in the 1950s, and in reconceptualizing it to meet a swiftly evolving historic preservation movement.⁴ Lee's familiarity with the program, its outcomes and shortcomings, led him to seek a new form of federal recognition for historic sites. He achieved this goal by restarting the Historic Sites Survey utilizing funds earmarked for Mission 66, a ten-year development program to improve visitor facilities throughout the National Park System spanning 1956–66. Lee conceived this restart as



**NEW YORK STATE BARGE CANAL
(WASHINGTON STREET LIFT BRIDGE),
TOWN OF OGDEN, NEW YORK**

(DESIGNATED DECEMBER 23, 2016)

The massive early-twentieth century enlargement of New York's canal system was an embodiment of a Progressive Era emphasis on public works. Constructed at the same time as the Panama Canal, New York State Barge Canal was ten times longer and required nearly ten times as many locks to raise and lower vessels over a total change of elevation that was six times that of the cross-isthmus canal. NPS IMAGE BY DUNCAN HAY, AUGUST 2012

part of a larger strategy to return the NPS to the forefront of historic preservation and to make the process of designating properties more transparent.⁵

A principal conundrum faced by Lee, the Advisory Board, and other NPS officials was how the federal government should recognize all of the historic places identified through the Historic Sites Survey. The Historic Sites Survey's original purpose was to identify nationally significant properties for acquisition by the NPS as national parks. However, the Survey identified and recorded so many nationally significant properties that creating NPS park units for all of them became impractical. The Survey also produced a large body of information on historic places having local or state significance.⁶ A partial solution was the creation of the Registry of National Historic Landmarks in 1960 as a new type of federal recognition, under the auspices of the Historic Sites Act. This action separated the federal recognition of nationally significant properties from the creation of national parks and National Historic Sites, and created a new purposeful and less cumbersome designation process.⁷ The Registry of National Historic Landmarks also began shifting the responsibility of researching and analyzing historic places away from NPS historians, allowing them to instead focus on reviewing information compiled and submitted by others.⁸ On October 9, 1960, the NPS publicly announced the designation of ninety-two properties as the very first NHLs.⁹

Congress resolved a second conundrum—how to provide federal recognition for properties of local or state significance—in 1966 with the passage of the NHPA. The NHPA created the National Register and the larger national historic preservation program as it exists today. The NHPA rebranded the Registry of National Historic Landmarks as the NHL Program and automatically listed all designated NHLs in the new National Register (For more information, see the section titled “The NHL Program and the National Register of Historic Places” in this chapter and Chapter 8: Comparative Analysis).

**CHICANO PARK,
SAN DIEGO, CALIFORNIA**

(DESIGNATED DECEMBER 23, 2016)

Chicano Park is an outstanding representation of the cultural and political legacies of the Chicano Civil Rights Movement. Through demonstrations, the community was successful in creating a park that was promised to them by the City of San Diego. Now a cultural and recreational gathering place for the Chicano community, the park contains an exceptional assemblage of master mural artwork painted on freeway bridge supports by a large group of Chicano artists' collectives. The Chicano Park Monumental Murals commemorate the social history of American Latinos/as in their struggle for political and social inclusion. NPS
IMAGE BY TODD STANDS, 2012



The NHL Program continued to evolve and expand its outlook after 1966. It incorporated new scholarship in the fields most closely associated with historic preservation—archeology, ethnography, architectural history, and history—and explored the past in new ways, through such lenses as class, ethnicity, folklore, gender, race, sexuality, vernacular architecture, and landscapes. Over time, these shifts have enlarged the universe of nationally significant themes, contexts, and topics in American history in a way that would have not been conceivable in 1935 or 1960, and have permitted the recognition of resources that once might have been overlooked.

TRACKING CHANGE THROUGH THEME STUDIES

Theme studies produced by the NHL Program demonstrate the increased inclusivity of its process and outlook over time, and are one of the primary methods used to identify potential NHLs. They examine nationally significant history related to a particular historical theme, and identify properties associated with the theme that might be good candidates for NHL designation (for more on theme studies, see Chapter 4). The production of NHL theme studies can be chronologically divided into halves. Theme studies prepared during the NHL Program's first three decades of existence focused predominantly on:

- European exploration and settlement, and westward expansion of the country;
- political and military affairs;
- wars—the Revolutionary War, the Civil War, and World War II;
- individuals and events involved with the formal establishment of the United States and its system of government;
- great works of high-style architecture; and
- milestones in the arts, education, science, commerce, transportation, and communication.

THEME STUDIES 2000–2023

Underground Railroad Resources in the United States Theme Study (1998, revised 2000), revision forthcoming.

Civil Rights in America series:

Civil Rights Racial Desegregation in Public Education in the United States (2000) and supplement (2004)

Racial Desegregation of Public Accommodations (2004, revised 2009)

Racial Voting Rights (2007, revised 2009)

Racial Discrimination In Housing (2021)

Racial Discrimination in Employment (forthcoming 2024)

The Earliest Americans Theme Study for the Eastern United States (2005)

World War II and the American Home Front (2007), revision forthcoming

Japanese Americans in World War II (2012)

American Latino Heritage (2013)

Labor Archeology of the Industrial Era (2015)

LGBTQ America: A Theme Study of Lesbian, Gay, Bisexual, Transgender, and Queer History (2016)

The Era of Reconstruction: 1861–1900 (2017)

Finding a Path Forward: Asian American and Pacific Islander National Historic Landmarks Theme Study (2017)

Protecting America: Cold War Defensive Sites (2022)

Labor History in the United States (2022)

African American Outdoor Recreation (2022)

Labor History in The United States: A National Historic Landmarks Theme Study (2022)

focuses on workers in agriculture, extraction industries like mining, manufacturing, transportation, and the service sector to highlight up-to-date research on a diverse variety of working people. The author identified 32 existing NHLs that could incorporate nationally significant labor history into updated documentation.

These studies mostly featured places, persons, events, and patterns that were familiar and dominant narratives of American history during the Cold War. While some theme studies encompassed a broader scope of history, most exhibited a traditional bias toward the history of European-American males, as did many of the NHLs they identified.

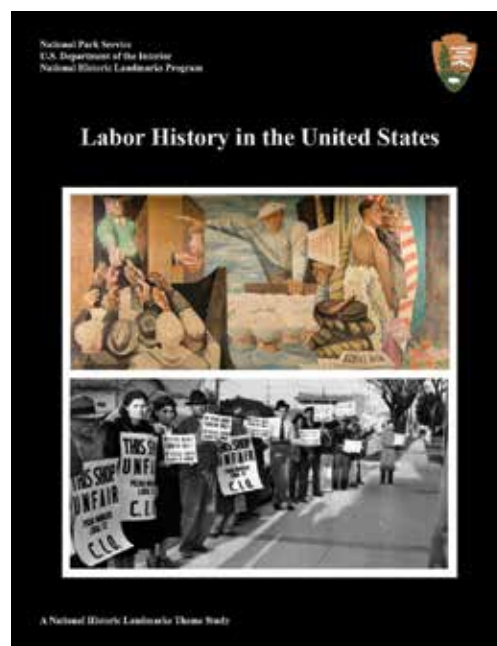
There were notable exceptions to this trend. In 1965, the NHL Program completed a theme study addressing social and humanitarian movements, and the momentum generated by the civil rights movement led to the creation of the Afro-American Bicentennial Corporation in the early 1970s. The Corporation collaborated with the NPS to identify sites “illustrating and commemorating the role of black Americans in United States history,” which formed the foundation for the “Black Americans in United States” theme study, completed in 1974.¹⁰ In the following decade, trends in social history likewise permitted the acknowledgment of leisure activities as a nationally significant theme of American life and led to the completion of the “Recreation in the United States” theme study in 1986.

The NHL Program’s focus dramatically expanded in the 1990s, due to further changes in the study of history and in congressional priorities. Increased grassroots community interest in NHLs and the NHL Program had a notable influence. On congressional instruction, the NPS revised the formally adopted framework used to identify nationally significant themes in American history, known as the thematic framework. Serving as the underlying basis of theme studies and NHL nominations, the NPS first adopted the thematic framework in 1936, revised it in 1970, 1987, and most recently in 1996. The most recent revision provides a more integrated view of history, stressing the interplay of race, ethnicity, class, and gender within and among the framework’s broadened topics.

In 1998, Congress established the Little Rock Central High National Historic Site and provided funds for an NHL theme study on the history of school desegregation, completed in 2000. This undertaking led to a partnership between the NHL Program, which has a mandate to identify and evaluate nationally significant

historic properties, and the Park Planning division, which had funding to support such studies. The results of this collaboration were considerable, and set the stage for the subsequent development of additional theme studies and heritage initiatives.

These documents helped renew the NHL Program’s commitment to extend the reach of recognition, documentation, and designation of historic places to better reflect the full spectrum of people, events, and experiences that have contributed to building, changing, and sustaining the nation.



THE NHL PROGRAM AND THE NATIONAL REGISTER OF HISTORIC PLACES

The NPS administers both the National Register of Historic Places and the NHL Program. These are distinct federal recognition programs with complementary, yet different criteria and requirements. As explained in the “History of the NHL Program” section, the National Register resulted from mid-twentieth century efforts to provide appropriate recognition for all historic properties. One of the major impetuses for its creation was the Historic Sites Survey’s identification of large numbers of historic properties whose significance was limited to a state or locality, and which fell outside the NHL Program’s mandate.

The National Register is the official list of the nation’s historic places worthy of preservation. Authorized by the NHPA, the evaluation of National Register eligibility is a planning tool used to identify, evaluate, and protect America’s historical and archeological resources, and part of a national strategy to coordinate and support public and private efforts in this regard. In 2023, there are more than 98,000 properties taking in over 1.8 million individual resources listed in the National Register. These properties tell stories that are important to a local community, the residents of a specific state, or to all Americans. National Register properties must maintain a reasonable level of integrity, but not as high as that expected of NHLs. The evaluation of integrity is also different. National Register properties must meet or surpass a threshold for integrity that conveys specific areas of significance, usually at a state or local level. In contrast, NHLs must retain a high degree of integrity relative to a specific argument for national significance and other similarly significant, comparable properties.

Distinct from the NHL Program, nominations for National Register listing are put forth by established nominating authorities. Most are nominated by the State Historic Preservation Officer (SHPO), but can also come from Tribal Historic Preservation Officers (THPOs) and Federal Preservation Officers (FPOs), for

PAN AMERICAN UNION HEADQUARTERS, DISTRICT OF COLUMBIA

(DESIGNATED JANUARY 13, 2021)

Pan American Union Headquarters served as the headquarters of a hemisphere-wide regional organization of American states that originated in 1890 and became a foremost center of diplomacy. Its design by noted architect Paul Philippe Cret synthesizes a Beaux-Arts architectural approach and North and South American themes and motifs to express the organization’s goals of promoting trade, unity, and political cooperation between the Americas.

NPS IMAGE BY LISA DAVIDSON, APRIL 2023





**EAGLE ISLAND
(ADMIRAL ROBERT E. PEARY
SUMMER HOME),
CUMBERLAND COUNTY, MAINE**

(DESIGNATED AUGUST 25, 2014)

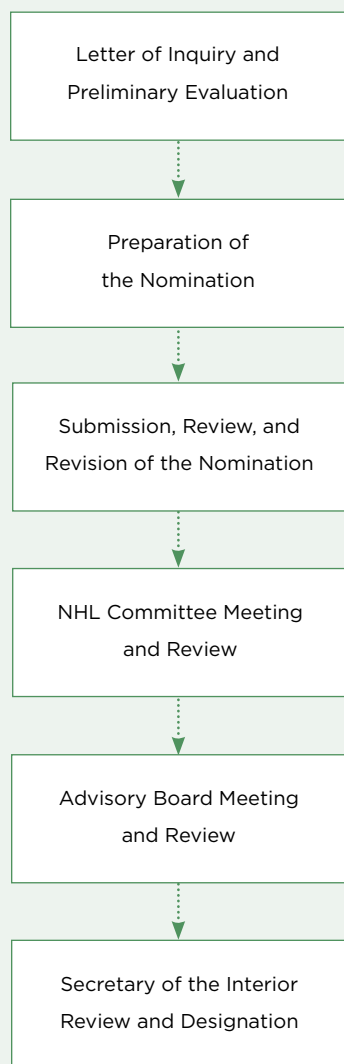
Eagle Island is the property that best represents the life and work of the arctic explorer, Richard E. Peary. His multiple expeditions to the North Pole and the coast of Greenland brought international recognition to the United States at the turn-of-the-twentieth century and made him one of the most admired men in America. He built his house on Eagle Island in 1904 on a prominent ledge facing north and the open sea. NPS IMAGE BY BRIAN VANDEN BRINK, SEPTEMBER 2001

properties on tribal lands and federally owned properties, respectively. National Register nominations are subject to a state-level review process, with the Keeper of the National Register having the final authority about whether to list. Finally, it is listing or eligibility for listing in the National Register, not NHL status, which requires compliance with Section 106 of the NHPA (36 CFR Part 800). Special consideration of NHL properties in the Section 106 process is further addressed in Section 800.10 of the regulations. (See Chapter 1 for more information about Section 106).

The NHL Program and National Register are both vital to the identification and recognition of historic places. The National Register provides baseline recognition of properties having national, state, or local significance. It also provides the essential reasoning and structure underlying this recognition. Such recognition, for example, is often used by Section 106 or other state and local laws as a threshold requirement, or for other purposes. NHLs are afforded the same benefits because they are also listed in the National Register; however, their designation has a distinct and very important function. NHLs are not only deemed worthy of preservation, but are recognized for their exceptional value in illustrating, interpreting, and commemorating the history of the United States for the inspiration and benefit of all Americans.

CHAPTER 3

PROCESS



The designation of an NHL is the culmination of a multistep process designed to be collaborative and transparent. The NHL designation process has been developed over time to assist the American public in identifying potential NHLs and in preparing nominations that meet program requirements—namely, accurately documenting a property’s national significance and its high degree of integrity, and concluding that it holds exceptional value in illustrating, interpreting, and commemorating aspects of American history. The process is also designed to ensure consistency and accountability in how national significance is assessed.

A level of review is involved in nearly every step to help ensure a nomination properly demonstrates how a property meets the NHL designation requirements. NHL Program staff is heavily involved at the beginning of the process, which focuses on the identification of possible NHLs and the creation of a viable nomination. Thereafter, they continue to provide assistance and information to property owners, nomination preparers, stewards, stakeholders, government officials, and all parties with either casual or vested interests in NHLs or the NHL Program.

There are six principal steps in the NHL process:

- 1 Letter of Inquiry and Preliminary Evaluation
- 2 Preparation of the Nomination
- 3 Submission, Review, and Revision of the Nomination
- 4 NHL Committee Meeting and Review
- 5 Advisory Board Meeting and Review
- 6 Secretary of the Interior Review and Designation

1 LETTER OF INQUIRY AND PRELIMINARY EVALUATION

The NHL process formally begins with submission of a “letter of inquiry” to the NHL Program requesting that a preliminary evaluation be conducted to determine whether a property is a good candidate for NHL designation. The submission can be made by email or through postal mail, and most originate from individuals or groups having a relationship with the historic property. The letter of inquiry introduces the property to NHL Program staff, and provides an overview of its national significance and level of historical integrity. In response, NHL Program staff sends an acknowledgment letter, which serves as a formal record that the NHL process has been initiated. It is recommended that an owner or proponent speak with NHL Program staff regarding a property, and its potential for designation as an NHL, prior to writing a letter of inquiry.

The letter of inquiry should provide relevant background history and suggested area(s) of national significance, related to at least one of the six NHL

**GONZALEZ-ALVAREZ HOUSE,
ST. AUGUSTINE, FLORIDA**

(DESIGNATED APRIL 15, 1970)

Popularly known as “The Oldest House,” the Gonzalez-Alvarez House is the oldest surviving Spanish colonial dwelling in St. Augustine, Florida. By 1727, Tomás González y Hernández, an artilleryman stationed at Castillo de San Marcos, and his family lived in the house, ultimately residing there for nearly forty years. An early example of St. Augustine’s Spanish colonial architecture, the original one-story house has coquina walls and floors of tabby. It was later enlarged in the eighteenth century during a period of British occupation. COURTESY OF JARED, FLICKR, CC BY 2.0, LICENSE: [HTTPS://FLIC.KR/P/BZQQPJ](https://flic.kr/p/BZQQPJ), MAY 2012



Criteria (see Chapter 5: NHL Criteria and NHL Criteria Exceptions). The letter should provide preliminary answers to the following questions:

WHAT IS THE HISTORIC IMPORTANCE OF THE PROPERTY? What nationally significant story does the property tell? For archeological sites or other properties submitted for their information potential, what nationally significant information has the property yielded or has the potential to yield from future investigation?

WHAT IS THE CURRENT HISTORIC INTEGRITY OF THE PROPERTY? Has the property undergone major alterations since the historically significant period? If so, how extensive are these alterations, and have they involved ground disturbance? Include current photographs of the property. What is the nature and condition of archeological deposits or other features of the property with the potential to yield nationally significant information?

WHY SHOULD THIS PROPERTY BE CONSIDERED ONE OF THE BEST IN THE COUNTRY TO ILLUSTRATE THIS NATIONALLY SIGNIFICANT STORY? How does it compare to other properties with similar significance? Consider how well the property illustrates the nationally significant story and how well-preserved it is compared with similar properties.

DOES THE ANTICIPATED NOMINATION HAVE THE SUPPORT OF THE PROPERTY OWNER? This is an essential element of the NHL process. If the owner does not support the preparation of a nomination and/or potential NHL designation, then proceeding with the preparation of an NHL nomination will not be recommended.

IS THE PROPERTY ALREADY LISTED IN THE NATIONAL REGISTER? If so, at what level of significance—local, state, or national?

Authors of letters of inquiry are welcome to include materials above and beyond the letter, such as copies of historic maps and photographs, brochures, or other research materials. However, these will be retained in the NHL Program files, and not returned.

Preliminary evaluation of potential NHL designations can take several months to complete. During this period, NHL Program staff becomes familiar with the submitted information and materials, and may conduct additional research and/or solicit advice from scholars and individuals with specific expertise in the history for which it is nationally significant. The SHPO for the state in which the property is located may also be contacted at this time, in addition to other organizations, agencies, or individuals that have a known interest in the property. Once this preliminary evaluation is complete, NHL staff prepares a response letter detailing whether the proposed property does or does not appear to be a good candidate for NHL designation.

The three possible outcomes of the preliminary evaluation are: yes, no, or maybe.

If yes, the response will encourage the preparation of a complete NHL nomination, make clear recommendations about the NHL Criteria that should form the basis of the argument for national significance (which may be different from those proposed in the letter of inquiry), and include the name and contact information of an NHL Program staff member assigned to assist proponents through the NHL process. If no, the response will offer a detailed explanation of the reasons why the property is not considered a good candidate for NHL designation. If maybe, the response will indicate that additional information is required from the proponent to complete the preliminary evaluation. An affirmative response at this stage does not in any way guarantee that a property will ultimately be designated an NHL. It solely indicates that a property merits further investigation through the preparation of an NHL nomination, and offers a clear path forward.

Should the preliminary evaluation conclude that a property is a good candidate for NHL designation and invite the preparation of a nomination, the NHL Program informs the following persons that a study of a property for possible NHL designation has been encouraged:

The owner(s) of the property;

The highest elected local official of the jurisdiction in which the property is located, such as a mayor or the chairman of a county board or commission;

SHPO for the state(s) or territories in which the property is located; if the property is located on tribal land, the Tribal Historic Preservation Officer (THPO) for that tribe; and if the property is owned by a federal agency, the Federal Preservation Officer (FPO) for that agency;

The two US senators for the state(s) in which the property is located; and

The US representative for the district(s) in which the property is located.

**OLD WEST, DICKINSON COLLEGE,
CARLISLE, PENNSYLVANIA**

(DESIGNATED JUNE 13, 1962)

Designed by Benjamin H. Latrobe, one of America's first professional architects, in 1803, Old West is the oldest building at Dickinson College. Because of funding issues, the stone building was built in increments and was completed only in 1822. The handsome Federal style building is capped with an open cupola and mermaid weathervane which has become the college symbol. NPS IMAGE, PHOTOGRAPHER UNKNOWN, N.D.



**MEDGAR AND MYRLIE EVERS HOUSE,
JACKSON, MISSISSIPPI**

(DESIGNATED DECEMBER 23, 2016)

The first Mississippi field secretary for the National Association for the Advancement of Colored People (NAACP), Medgar Evers became a nationally known civil rights leader by the late 1950s. Evers's assassination on June 12, 1963, in the carport of his home, was the first murder of a nationally significant civil rights leader, focusing national attention on the necessity for civil rights legislation. His death forced his wife, Myrlie Evers, into a more prominent role for the NAACP and it also became one of the catalysts for the passage of the Civil Rights Act of 1964. NPS IMAGE BY JENNIFER BAUGHN, SEPTEMBER 2008



2 PREPARING THE NOMINATION

Once the NHL Program invites a proponent to submit a nomination, the process of preparing the document begins. An NHL nomination requires a high level of research, writing, and analysis in history, archeology, architectural history, landscape history, or other fields, or a combination of these and/or related disciplines. Other chapters of this bulletin discuss the three principal components of an NHL nomination and how to fill out each section of the nomination form. These include the demonstration of national significance using the NHL Criteria (Chapter 5), the evaluation of whether a property maintains a high degree of integrity (Chapter 6), and the comparative analysis of related properties (Chapter 8). Detailed guidance about how to fill out each section of the nomination form is found in Chapter 9.

Although anyone is welcome to initiate the NHL process and pursue formal designation of a property, engaging the services of a professional to prepare a nomination is generally recommended. The federal regulations explain, “the evaluations of properties being considered for landmark designation are undertaken by professionals, including historians, architectural historians, archeologists and anthropologists familiar with the broad range of the nation’s resources and historical themes.”¹ Such professionals are familiar with how to construct historical arguments required for NHLs, which both address and are informed by a physical place, and can help ensure the efficient and successful completion of a nomination.

If a consultant is hired, the nomination proponent should provide the consultant with the response letter containing the NHL Program’s preliminary evaluation/response, and instruct them to immediately contact the appointed NHL Program staff member. This staff member can be contacted for assistance at any time during preparation of the NHL nomination. The SHPO for the state in which a property is located should also be utilized as a source of advice and information in the development of a nomination.

The nomination package includes these elements:

Completed draft nomination form

Locational and boundary maps

Photographs of the property, both historic and current

Floor plans, site plans, and/or other figures including copyright free historic images

**SUN RECORD COMPANY,
MEMPHIS, TENNESSEE**
(DESIGNATED JULY 31, 2003)

At Sun Studios in the 1950s, Sam C. Phillips recognized the talent of B. B. King, Howlin' Wolf, Ike Turner, Rufus Thomas, Elvis Presley, Johnny Cash, Jerry Lee Lewis, Carl Perkins, Charlie Rich, Roy Orbison, and many others. Sam Phillips and his recording studio were critical in the development of the unique American style of music known as rock 'n' roll, a blend of African American and white country styles. NPS IMAGE, PHOTOGRAPHER UNKNOWN, N.D.

3 SUBMISSION, REVIEW, AND REVISION OF NOMINATION

A full nomination package prepared and submitted to the NHL Program should include the following parts: a completed draft nomination form with correctly formatted footnotes and a bibliography; a locational map that clearly labels the property being nominated; properly labeled photographs of the property; an NHL boundary map, floor plans, site plans, and/or other figures such as historic images, as appropriate. (For more detailed information about the technical requirements for maps and images, see Chapter 9: The Nomination).

Once a full draft of a nomination is completed it can be submitted electronically to the NHL Program staff for review. NHL Program staff review the nomination and typically suggest revisions intended to improve the document and its argument(s).

These revisions can vary in length and/or detail, depending on the strength of the first draft. Some requested revisions can be quite substantial, especially if a solid, well-documented case for NHL designation has not been made, and several rounds of revision might be necessary. Through this entire process, the intent of the NHL Program staff is to help nomination authors prepare a well-crafted document with the best chance of successfully achieving designation for the nominated property.

The NHL Program will also contact historians or other subject matter experts to peer review a nomination to ensure its quality. Peer reviewers are selected based on familiarity with the subject of the nomination and are typically well-established professionals within their disciplines. If the nomination cites multiple NHL Criteria or if staff recommends additional external review, the program may request the input of more than one peer reviewer.



4 NHL COMMITTEE MEETING AND REVIEW

Once the draft nomination is assessed as complete and fully reviewed, the NHL Program places the nomination on an agenda for a meeting of the NHL Committee. Presentation of the nomination to the NHL Committee also typically requires the submission of an executive summary and PowerPoint presentation following an NHL Program template. The NHL Committee, a subcommittee of the National Park System Advisory Board appointed by the Secretary of the Interior, is a panel of subject matter experts established to ensure that all nominated properties undergo appropriate and detailed review. The NHL Committee consists of ten to twelve scholars and experts in history, archeology, architectural history, historic preservation, and related cultural resources disciplines from across the nation. This body typically convenes twice a year, in the spring and fall, and usually considers no more than fifteen to twenty nominations at each meeting.

Prior to the scheduled NHL Committee meeting, the NHL Program provides meeting information to those individuals who earlier received formal notice of the nomination's preparation. (See the section titled "Letter of Inquiry and Preliminary Evaluation" earlier in this chapter). These parties are invited to attend the meeting and/or send written comments to the NHL Program that speak to the proposed NHL generally and/or the adequacy of the nomination's documentation. The meeting information, along with a list of nominations to be considered, is also published in the Federal Register and posted with the draft nominations on the NHL Program's website.

In addition to the NHL Committee members, NHL Program and other NPS staff, individuals presenting the nominations, property owners (if desired), and other attendees—whether supporting or opposing the nomination—may wish to attend. The nomination preparer is typically expected to attend the meeting, as they are often the best individual to present the nomination to the NHL Committee and to answer questions related to the research represented in the nomination. While not a requirement, the property owner(s) or a person representing the property owner(s) is encouraged to attend. As of 2020 NHL Committee Meetings are conducted virtually. At the meeting, the NHL Committee is provided with a short presentation on each nomination and copies of any comment letters received during the process. They may hear comments from those in attendance, at the discretion of the chair. NHL Committee members may also direct questions to the preparer, the owner(s) or representative of the owner(s), NHL Program staff, or other interested individuals in attendance.

When their deliberations are complete, the NHL Committee votes whether or not to recommend a nominated property to the Advisory Board for further consideration. If the NHL Committee votes in favor of designation, the nomination moves forward to the Advisory Board for review. If the members vote against recommending a designation, the nomination does not move forward and the NHL process for that property is ended. While possible, an outright "no" vote is rare. More often, the NHL Committee may find a nomination lacking in some way and will recommend that it be revised or expanded. If the proposed changes are major, such as considering another NHL Criterion or an additional area of national significance, the NHL Committee may table the nomination

and defer its decision until a future meeting. If the changes are minor and merely intended to strengthen or correct aspects of the documentation, the NHL Committee may vote to recommend the property to the Advisory Board contingent on specific revisions being made to the nomination before its review by the Advisory Board.

5 NATIONAL PARK SYSTEM ADVISORY BOARD MEETING AND REVIEW

After the NHL Committee meeting, NHL Program staff prepares a report for the Advisory Board summarizing the NHL Committee's recommendations about nominated properties. The Advisory Board counsels the Director of the National Park Service and the Secretary of the Interior on all topics relevant to the NPS, and its parks and programs. Appointed by the Secretary of the Interior, the Advisory Board consists of roughly a dozen citizens drawn from throughout the country who are dedicated to the conservation of natural and cultural resources.

Sixty days prior to the Advisory Board's scheduled meeting, a public notice is issued in the Federal Register about the meeting date, time, and location, and a list of the nominations to be considered. During its meeting, the Advisory Board reviews the properties recommended for NHL designation—including the nominations, all comments received, and the NHL Committee's report—and makes a determination about whether a property does or does not meet the conditions for NHL designation. It then makes its own recommendations to the Secretary of the Interior about whether to designate, not designate, or to request further review of a nominated property.

USS SLATER, ALBANY, NEW YORK
(DESIGNATED MARCH 2, 2012)

By protecting convoys of supply ships crossing the Atlantic and Pacific Oceans, destroyer escorts were a vital component of the Allied victory during World War II. Their design and construction exemplify advancements in technology and wartime mobilization in the face of unprecedented and immediate demands for well-armed naval escorts. Only ten of these destroyer escorts survive, and Slater (DE-766) is by far the best-preserved example of a World War II destroyer escort in the world.

NPS IMAGE, 2006



**GEORGE WASHINGTON
MASONIC NATIONAL MEMORIAL,
ALEXANDRIA, VIRGINIA**
(DESIGNATED JULY 21, 2015)

The George Washington Masonic National Memorial sought to demonstrate how aspects of Freemasonry had shaped Washington's character and influenced his actions during the Revolution and the establishment of the nation. This striking memorial occupies a dramatic hillside site, whose terraced landscape design was produced by the famed Olmsted Brothers firm. The eclectic building combined neoclassical austerity common to contemporary American memorials and civic buildings with the excitement and energy of modern skyscraper design. NPS/HABS IMAGE
BY RENEE BIERETZ, DECEMBER 2010



6 SECRETARY OF THE INTERIOR REVIEW AND DESIGNATION

The final decision about whether to designate a new NHL rests with the Secretary of the Interior. The NHL Program prepares a nomination package based on the recommendations of the Advisory Board and submits it to the Secretary's office. The Secretary examines the Advisory Board's recommendations and documentation on each of the nominated properties before making a final determination of whether to designate, not to designate, or to ask for further review of a nominated property. A Department of the Interior press release publicly announces the Secretary's decisions.

If the outcome is positive and a property is designated, NHL Program staff directly notifies the owner(s) and the other parties, as required. The NHL Program also invites the owner(s) to accept a complimentary bronze plaque bearing the property's name, its year of designation, and, if desired, a statement about its national significance. The plaque is presented to owner(s) who, as established through the federal regulations, agree "to display it publicly and appropriately." The NHL Program also sends the owner(s) a certificate recognizing the property's designation as an NHL.

At this point, all steps in the NHL Process are considered to have been completed. The NHL nominations for designated properties are formatted and finalized by NHL Program staff and are made available online. Although this concludes the formal NHL process, NHL Program staff is always available to answer questions and provide preservation advice to stewards of NHLs. The NHL Program may make minor technical corrections to the nomination, as needed, after designation. However, any substantive updates to the documentation must be submitted as a request for updated documentation, and proceed through the full NHL process (for more on updated documentation, see: Chapter 4: National Significance and Chapter 9: The Nomination).

CHAPTER 4

NATIONAL SIGNIFICANCE

PENNSYLVANIA RAILROAD DEPOT AND BAGGAGE ROOM, DENNISON, OHIO

(DESIGNATED JUNE 17, 2011)

The Dennison train depot was on a main line transporting World War II-era servicemen and women to training and debarkation points on either coast, and ultimately, back home from overseas. The station was also the home of the Dennison Depot Salvation Army Servicemen's Canteen with almost four thousand volunteers staffing the canteen and working around the clock to serve 1.3 million men and women during the war. It is the only surviving station in the United States that still reflects its role as a World War II canteen. NPS
IMAGE BY GERALD WILSON, C. 2008

The association of nationally significant history with a property stands at the core of whether a property has the exceptional value in illustrating, interpreting, or commemorating the history of the United States required of an NHL. Evaluating national significance encompasses both the evaluation of a resource's degree of integrity as well as the creation of a comparative analysis of related properties. *The Code of Federal Regulations* at 36 CFR § 65.2 states: "the purpose of the National Historic Landmarks Program is to focus attention on properties of exceptional value to the nation as a whole rather than to a particular State or locality." The demonstration that a property holds exceptional value to the nation as a whole is at the center of the NHL nomination and designation process, and such a conclusion is reached using the qualitative framework explained in Chapter 1.

The identification of nationally significant themes as part of the NHL process involves consideration of the history associated with a property. The property may be the place where a nationally significant event occurred or where the nationally significant work of an individual or group took place. It may hold the potential to further understand nationally significant patterns of settlement through archeological investigation. Or the property might contain built resources that document nationally significant ways of life or are benchmarks in the development of art, architecture, engineering, or landscape design.



**OLD FIRST PRESBYTERIAN CHURCH,
NASHVILLE, TENNESSEE**

(DESIGNATED APRIL 19, 1993)

Designed by William Strickland, one of the foremost architects in the nation in the first half of the nineteenth century, this church is one of the country's largest and most important Egyptian revival buildings. The building was begun in 1849 but the dramatic and colorful interior, full of Egyptian motifs, dates from the 1880s. NPS IMAGE BY TOM GATLIN, N.D.



The challenge is how to concisely present these areas of significance for complex, multi-layered properties, or when a property may be considered nationally significant for multiple reasons. Preparers of NHL nominations are advised to limit discussion of a property's history to only the background information necessary to comprehend a property's national significance. An NHL nomination is not intended to be the definitive history of a nominated property and does not generally need to chronicle the entirety of a historical theme or context. Rather, it should contain a well-informed and persuasive argument about why a property should be designated as an NHL, providing only the information necessary to make this case.

Limiting a nomination's background history in this way supports the NHL Program's goals and the purpose of NHLs. The intent is to avoid diluting or obscuring a nomination's argument for national significance with unrelated information. Crafting a focused, well-stated argument for national significance facilitates a nomination's review and reduces resources expended in the process of its preparation. This advice is not intended to imply a ranking system for the various reasons a community might hold a property in high esteem.

Not all nationally significant themes are uniformly represented nationwide. Regional patterns found only in one part of the country may be significant nationally, if the pattern reflects an important trend in United States history. Federal ownership of a property, alone, also does not mean that a property is automatically nationally significant. A property may be associated with a national theme—for example the office or home study of a presidential cabinet officer—but not be considered nationally significant unless the activities that occurred there were found to be of national importance. Finally, places located outside the borders of the United States and its territories associated with nationally significant American history generally cannot be considered for designation as an NHL.

NATIONAL SIGNIFICANCE AND PLACE

As a place-based program, it is the physical existence of a district, site, building, structure, and/or object that permits the consideration of whether a property holds national significance. The evaluation of national significance (and the application of NHL criteria) is informed by an assessment of the physical qualities that contribute to a resource's historic integrity. Without a defined physical place, national significance cannot be ascribed under the NHL Program.

For example, originally designated an NHL in 1967, William Hamilton's neoclassical mansion at The Woodlands in Philadelphia, Pennsylvania (period of significance—1766–ca. 1898), is one of the finest houses constructed in eighteenth-century America. Updated documentation approved in 2006 expanded the NHL's argument for national significance beyond the sophisticated architecture of its suite of elegant public rooms to include secondary spaces and the landscape of the property. This update was based on new research using both primary and secondary sources as well as information about the house and landscape gained through on-site fieldwork.

Of particular note, the expanded significance argument was supported by identification of a complex arrangement of well-finished and preserved service spaces that retained a high degree of integrity. These spaces, and their relationship within the larger landscape, expanded the architectural and social contexts present in the property's argument for national significance. Without these intact spaces, the argument for expanded national significance would not be possible.

Nationally significant properties embody stories that have exceptional value to the nation as a whole. NHL nominations should strive to clearly explain this contribution. The concept of national significance should also not be confused with the measure of a property's fame or popularity. The history embodied in NHLs may not always be familiar, but their significance to the nation means that they are no less deserving of recognition.

THE WOODLANDS, PHILADELPHIA, PENNSYLVANIA

(DESIGNATED DECEMBER 24, 1967, UPDATED
DOCUMENTATION MARCH 20, 2006)

William Hamilton's neoclassical mansion is one of the finest houses constructed in eighteenth-century America. In 2006, updated documentation expanded the NHL's argument for national significance beyond the public rooms of the house to include the service spaces, their relationship to the larger house and landscape, their social context, and their architectural significance. NPS/HABS IMAGE
BY JOSEPH E.B. ELLIOTT, 2002



**KNIGHT'S FERRY BRIDGE,
STANISLAUS COUNTY, CALIFORNIA**

(DESIGNATED OCTOBER 16, 2012)

The Covered Bridge NHL Context Study, sponsored by the National Historic Covered Bridge Preservation Program, considered over one hundred bridges and ultimately recommended that twenty be further studied for possible NHL designation as “outstanding representative examples of their type.” Covered bridges are a type of built heritage described as a “pre-eminently American phenomenon” and as a “remarkable achievement in civil engineering.” Constructed in 1862–1863, Knight's Ferry Bridge NHL is an exceptionally fine, structurally intact example of nineteenth-century covered bridge construction. NPS/HAER IMAGE BY JET LOWE, 2004



THEME STUDIES, SPECIAL STUDIES, AND UPDATED DOCUMENTATION

A single nomination must be prepared for every property considered for NHL designation. National Historic Landmark nominations can originate from several sources, including theme studies, special studies, and National Register nominations. Those developed under a theme study or context study benefit from the collected and analyzed information of a larger study, whereas individual nominations are self-contained investigations of a specific type of resource. Regardless of source, the resulting nominations contain the same components.

THEME STUDIES

Potential NHLs are often identified through theme studies. Theme studies are substantial documents that elaborate on a particular topic(s) in American history, discussing its national significance, and relating it to any number of important historic properties. *The Code of Federal Regulations* at 36 CFR Part 65.5 explains that “potential National Historic Landmarks are identified primarily by means of theme studies,” and nominations often result from these studies. Theme studies are typically conducted at the direction of Congress, the Secretary of the Interior, or the Director of the NPS. The federal regulations further explain that “theme studies provide a contextual framework to evaluate the relative significance of historic properties and determine which properties meet National Historic Landmark criteria.” Although they require considerable time and effort to create, theme studies are often the most efficient way of identifying and nominating nationally significant properties associated with a particular historical topic.

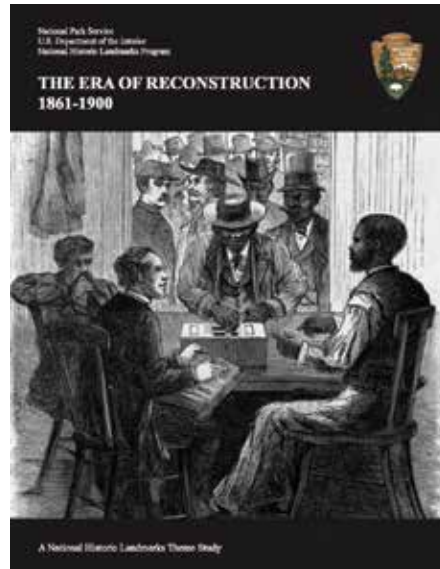
The Era of Reconstruction, 1861–1900: A National Historic Landmarks Theme Study 2017

positions Reconstruction as “one of the most dynamic, inspiring, heart-rending, and transformative periods in American history. It was in many ways the nation’s Second Founding.” After documenting the history, the authors identified twenty-eight associated properties that are NHLs or National Park units, and proposed twenty-seven properties for further study for possible NHL designation.

**NORTHWESTERN BRANCH,
NATIONAL HOME FOR DISABLED
VOLUNTEER SOLDIERS (NHDVS),
MILWAUKEE, WISCONSIN**

(DESIGNATED JUNE 17, 2011)

The Northwestern Branch of the NHDVS is an outstanding representation of the development of a national system of medical and residential benefits for disabled veterans. Established in 1866, the Northwestern Branch was one of three original NHDVS facilities, and it retains the oldest buildings in the system. In partnership with the Veterans Affairs Federal Preservation Office and the National Council on Public History (NCPH), a context study was prepared to assess the significance and integrity of the eleven remaining NHDVS facilities and develop NHL nominations. NPS/HABS IMAGE BY JAMES ROSENTHAL, 2008



cance of cultural resources.”¹ The comparative analysis identifies and appraises properties associated with the history discussed in the theme study as possible candidates for NHL designation. This comparative analysis typically provides both preliminary assessments of integrity and explanation of how a property relates to the given national theme.

Potential NHLs identified by a theme study are considered for NHL designation through the same NHL process as any other nomination. However, individual nominations related to a theme study are more easily prepared because the theme study has already established how the property meets the three conditions for ascribing national significance. The benefit is that this information does not necessarily need to be rewritten in an individual nomination and can be incorporated by reference. The individual NHL nomination would still need to include a property’s site-specific history and express the arguments and reasoning that support its national significance and demonstrate its high degree of integrity.

Theme studies may be prepared internally by NPS staff or under cooperative agreements or contracts made between the NPS and other governmental entities or private organizations. In the development of theme studies, partnerships with the academic community, independent scholars, and other knowledgeable experts are common. Academic and professional standards are followed and current

scholarship is used so that a completed theme study is robust in its conclusions and recommendations for possible NHLs.

Over time, theme studies can become outdated or less effective in informing the development of individual nominations. This is largely due to the emergence of new scholarship that shifts how one views the past and changed standards and expectations for the content and method of historical documentation. NHL Program staff can provide guidance about whether a particular theme study still meets current scholarly and professional standards. For a list of the most current theme studies see Chapter 2 or the NHL Program website.

**LAUREL HILL CEMETERY,
PHILADELPHIA, PENNSYLVANIA**

(DESIGNATED AUGUST 5, 1998)

Laurel Hill Cemetery is one of the most important cemetery landscapes in the United States and a principal benchmark in the development of the rural cemetery landscape typology, beginning in the 1830s. Lacking a theme or context study on the topic, the nomination for Laurel Hill presented a fully developed context for the rural cemetery movement as a nationally significant social and cultural movement, which merged such varied ideas as horticulture, landscape architecture, burial reform, funerary art, public health, and recreation. Although not developed as a context study, the benchmark information contained in this nomination led to the later consideration of several other rural cemeteries for NHL designation. NPS IMAGE BY AARON WUNSCH, 1997



SPECIAL STUDIES

The *Code of Federal Regulations* at 36 CFR § 65.5 explains that the NPS may “conduct special studies for historic properties outside of active theme studies.” Instead of a mandate by Congress, the Secretary of the Interior, or the Director of the NPS, special studies are supported by individuals, groups, government agencies, and organizations outside the federal government. Special studies also tend to have a more defined focus, examining the history of a specific property or a known group of properties, in contrast to theme studies, which consider topics in history rather than targeted properties. Special studies take one of two general forms: context studies and individual nominations.

CONTEXT STUDIES

Context studies are more limited in scope than theme studies and consider the national significance of a known group of similar or related properties associated within a specific topic in history. Despite this distinction, they function in a similar manner to theme studies. Context studies examine a historical topic and use this knowledge to identify potential NHLs through comparative analysis, which includes preliminary evaluations of relative national significance and integrity. As with theme studies, each property identified in a context study for possible NHL designation requires its own nomination.

INDIVIDUAL NOMINATIONS

An individual nomination must be prepared for every property considered for NHL designation, even if it originated from a theme study or context study. It is an NHL’s essential form of documentation. When not associated with a theme study or context study, an individual nomination functions as a standalone special study for a single property. Nominations such as these are largely self-contained and do not benefit from the collected knowledge and analysis presented in a theme study or context study—often because no such study has yet been completed. As a result, they require more time and effort to prepare because the nomination by itself must fully demonstrate that the property meets all three conditions for NHL designation.



**FORT UNION TRADING POST,
WILLIAMS AND MCKENZIE COUNTIES,
NORTH DAKOTA, AND ROOSEVELT
AND RICHLAND COUNTIES, MONTANA**

(DESIGNATED JULY 4, 1961; UPDATED
DOCUMENTATION FEBRUARY 27, 2015)

The site of Fort Union was originally designated an NHL in 1961 because from 1828 to 1867, it was the principal fur trading depot in the upper Missouri River region. The NPS initiated a subsequent update to the NHL documentation to address a substantial increase in knowledge about the property, its nationally significant history, its resources, and its development (including reconstruction of the fort) in the years since its designation. In addition to confirming the boundary, the update explored an expanded fur trade context, substantially augmented the archeological information, and identified and assessed all associated cultural and natural features. NPS IMAGE BY DENA SANFORD, 2012

Individual nominations must document a property's national significance and high integrity, and present a complete comparative analysis of related properties. Even if the property is not identified in a theme study or context study, an individual nomination may still benefit from shared historical background about a property or property type.

UPDATED DOCUMENTATION

Over time, proponents may wish to update an NHL's documentation. Updated documentation typically enlarges what is known about an NHL's history, considers other areas of national significance, utilizes additional NHL Criteria, or proposes changes to an established NHL boundary. Updates are accomplished by preparing a new nomination that combines the original nomination with any new information. This updated nomination passes fully through the NHL process, and replaces the original as an NHL's formal documentation, once it is approved. This is a key difference between NHL designation and the National Register of Historic Places process for amending listings with additional documentation.

A request for updated NHL documentation is typically made by an NHL property owner or steward. Such requests are particularly common for NHLs designated early in the program's history, which were documented with limited information, and for NHLs that are open to and interpreted for the public. The NPS, for example, sometimes generates updated NHL documentation for NHLs in National Park System units to support park planning and resource management. The impetus might be the discovery of new sources of information about the property or the publication of new scholarship, which presents a better understanding of the NHL's place in history or tells a fuller story of its cultural and social history from a different perspective. In general, it is always desirable to have the most up-to-date knowledge available included in the NHL documentation.

Updated NHL documentation may also be useful to property owners and stewards of NHLs for clarifying boundaries or providing the inventories of contributing and noncontributing resources not typically included in nominations prior to 1986. Per the 1986 amendments to the Tax Reform Act of 1976, resources in nominations were required to be specifically identified as contributing or noncontributing to facilitate eligibility assessments for federal historic preservation

tax incentives. For NHLs designated prior to the 1986 registration form which do not have updated documentation approved by the Secretary of the Interior, all resources within the boundary of the NHL are considered contributing if they are within the period and areas significance identified in the original nomination.

There is no requirement to update a property's existing NHL documentation, even when new information, viewpoints, or methods of analysis are known to exist. NHL designations stand on the documentation and process of review at the time of a property's original nomination and designation. However, updated documentation, which weaves together the existing and new information, must meet the current standards expected of new nominations. Proponents are encouraged to contact an NHL staff member for advice when contemplating an update to existing NHL documentation.

EXPLORING THE NATIONAL SIGNIFICANCE OF A PLACE

Any standard method of conducting historical or archeological investigation may be used to examine a property's national significance under one or more of the NHL Criteria (See Chapter 5). These methods can range from conventional research in libraries and archives to intangible cultural evidence, such as oral histories, creation, migration, and origin stories, and traditional knowledge. For most nominations, their preparation will involve varying amounts of primary and secondary source research. The level of effort will depend on the degree to which a property's history or its national significance have been previously explored by academic scholarship, prior theme studies, special studies, and/or nominations.

MERCHANTS' NATIONAL BANK, GRINNELL, IOWA

(DESIGNATED JANUARY 7, 1976)

Small in scale, monumental in effect, this is among the best—and best preserved—of many Midwestern banks designed by Chicago architect Louis Sullivan. One of the fathers of modern American architecture, Sullivan designed this bank late in his career. Completed in 1914, the building is fronted by a terra-cotta sunburst displaying the architect's signature foliate ornamentation.

NPS IMAGE BY ROGER REED, JULY 2012



Site visits are necessary to gain an understanding of the form and character of the physical place, and to inform an argument for national significance. They also enable a detailed evaluation of a property's level of integrity. Ideally, a site visit is undertaken before research and writing begins to obtain information about a property and its physical attributes. Another site visit, conducted after gaining a more intimate knowledge of the history of the place and its nationally significant history, often helps to fine-tune certain aspects of a nomination.

A nomination's preparation should include meetings and interactions as early in the process as possible with interested individuals, groups, organizations, and communities, and not just those who have ownership or other financial interest in the property. These parties may range from SHPOs, THPOs, and FPOs to local historical societies and groups holding an emotional or spiritual investment in a place. Communication with governmental personnel, such as national, state, and local officials, and the academic community is highly recommended and strongly encouraged.

Outreach to such stakeholders can have a number of positive outcomes. Their knowledge of a place and its history enhances understanding of a property and its broader significance and values. It practically informs the national significance explored in the NHL nomination. Interaction with stakeholders also helps familiarize them with the purpose and process of the NHL Program and the nomination's progress. Conversely, stakeholder communication affords the preparer knowledge of local issues and concerns that could delay a nomination or cause public scrutiny in the future.

LYCEUM—THE CIRCLE HISTORIC DISTRICT, OXFORD, MISSISSIPPI

(DESIGNATED OCTOBER 6, 2008)

Lyceum—The Circle Historic District is nationally significant in the history of school desegregation for the federal enforcement of the US Supreme Court's 1954 *Brown v. Board of Education* decision declaring racially segregated schools unconstitutional. The period of significance is a short two-day period, from September 30 to October 1, 1962, when President John F. Kennedy used federal troops to enforce the implementation of the US Fifth Circuit Court's order admitting African American student James Meredith to the University of Mississippi over the resistance of Mississippi Governor Ross Barnett. Troops violently clashed with segregationist rioters within The Circle to allow Meredith to register in the Lyceum building. NPS IMAGE BY GENE FORD, 2007



**DEER MEDICINE ROCKS,
ROSEBUD COUNTY, MONTANA**

(DESIGNATED MARCH 2, 2012)

Deer Medicine Rocks is nationally significant for its associations with the Great Sioux War of 1876–1877. It represents an alternate historical interpretation of the Battle of the Little Big Horn as viewed from a Native American perspective. Two specific dates are highlighted within the period of significance. The first, June 4–8, 1876, is when Hunkpapa medicine man Sitting Bull held a Sun Dance in the Rosebud Valley and received a prophecy of tribal victory at the Battle of the Little Bighorn. This vision is inscribed on Deer Medicine Rocks. The second date, June 25–26, 1876, records the Battle of Little Big Horn itself in which the tribes were victorious over Lieutenant Colonel George A. Custer's Seventh Cavalry Command. NPS IMAGE BY ROGER WHITACRE, 2007



PERIOD OF NATIONAL SIGNIFICANCE

A property's national significance usually does not encompass the entirety of its age/physical existence. Establishing national significance includes identifying a length of time during which a property was associated with nationally significant events, activities, and persons, or attained the qualities that make it a candidate for NHL designation. This timespan is referred to as the period of significance. In most cases, a continued use or activity is not sufficient justification for a period of significance. Rather, a period of significance should solely reflect the time during which a property's nationally significant history occurred or when the physical character for which it is significant was established.

Depending on the argument for national significance, a period of significance may be as short as a day or can span millennia. Most properties will have a single period of significance; however, some may have more than one. In case of the latter, it is possible the periods of significance might correspond exactly in time, but it is more likely they will be independently formed, sometimes overlapping and sometimes representing fully separate time periods. In nearly all cases, a period of significance will have a start and end date. Occasionally, a property's period of significance might have an indefinite beginning or end, as with a traditionally cultural place (TCP). However, these cases are few and should be discussed with NHL Program staff when considered.

For periods of significance that extend to less than fifty years from the present, a nomination must also apply and justify the use of NHL Exception 8 (see Chapter 5). Finally, an NHL's period of significance may differ from one provided in the property's National Register nomination, if it was previously listed.

**MURRAY SPRINGS CLOVIS SITE,
COCHISE COUNTY, ARIZONA**

(DESIGNATED OCTOBER 16, 2012)

The Murray Springs Clovis Site is among the richest early Paleoindian sites in North America with a mammoth-kill site, a bison-kill site, and a Clovis camp site. Sites associated with the Clovis culture are extremely rare, and this one is further distinguished from other known Clovis sites because of its unusually intact camp site and processing areas, as well as its geological sequence. Its period of significance, dating to 13,000 years ago, is based on radio-carbon dates. NPS IMAGE BY T. HEMMINGS, CA. 1967



CHAPTER 5 CRITERIA

The NHL Criteria are the defined categories under which a property’s national significance is presented in a nomination. The application of at least one NHL Criterion for a nominated property is required and is one of the three conditions necessary for designation. The categories of the NHL Criteria are:

- NHL Criterion 1: Events and Broad Patterns
- NHL Criterion 2: Person(s)
- NHL Criterion 3: Ideals
- NHL Criterion 4: Architecture, Engineering, Landscape Architecture, Urban Design
- NHL Criterion 5: Districts
- NHL Criterion 6: Information Potential

The NHL Criteria are best understood as overarching classifications that help to better understand a nominated property’s national significance, and to relate that significance to other properties. They are individually far-reaching and, taken together, permit the exploration of virtually any area of United States history using a variety of methods and approaches.

The NHL Criteria Exceptions or, more simply, the NHL Exceptions, are eight additional categories for certain types of properties that require special consideration, due to their particular characteristics. Any applicable NHL Exception must be fully addressed in an NHL nomination.

- NHL Exception 1: Religious Properties
- NHL Exception 2: Moved Properties
- NHL Exception 3: Sites of buildings or structures no longer standing
- NHL Exception 4: Birthplaces or graves
- NHL Exception 5: Cemeteries
- NHL Exception 6: Reconstructed Properties
- NHL Exception 7: Commemorative Properties
- NHL Exception 8: Properties Less than 50 Years Old

**COLORADO CHAUTAUQUA,
BOULDER, COLORADO**
(DESIGNATED FEBRUARY 10, 2006)

The Chautauqua movement, which flourished between 1874 and the 1930s, brought unprecedented educational, cultural, and recreational opportunities to millions of Americans. Founded in 1898 as the Texas-Colorado Chautauqua, the Colorado Chautauqua was originally designated as a summer school for Texas teachers successfully assimilated the popular entertainment featured at the circuit Chautauqua with the educational emphasis of the independent assembly held annually in the summer at a permanent location.
NPS IMAGE BY JENNIFER KIRSCHKE, 2004





**PORTLAND OBSERVATORY,
PORTLAND, MAINE**

(DESIGNATED FEBRUARY 17, 2006)

Nationally significant under Criterion 1, the Portland Observatory is the only known surviving example of a maritime signaling station. At one time, maritime signaling stations were prominent fixtures along the coast relaying messages from ship to shore. Visual communication meant that merchants and ship owners could relay messages several hours before the arrival of a vessel at port. Consequently, owners could learn of damaged cargo or other problems, or could reserve a berth on the wharf and hire men to unload and reload the vessel in a timely fashion. NPS

IMAGE BY TIMOTHY P. BYRNE, 2000

**NORMAN FILM MANUFACTURING
COMPANY, JACKSONVILLE, FLORIDA**

(DESIGNATED OCTOBER 31, 2016)

The Norman Film Manufacturing Company is nationally significant under Criterion 1 for its association with the early motion picture industry. It is a rare extant silent film studio that never transitioned to sound production and is a touchstone to a period when New York-based film studios relocated to Jacksonville, Florida, for the winter. The Norman Company is also significant for producing what were known as “race films,” created specifically for African American audiences with African Americans in the leading roles as agents of action and change within the film. NPS IMAGE BY ERIN MONTGOMERY, JANUARY 2015

NHL CRITERIA

Six NHL Criteria are used to assess the national significance of properties nominated as NHLs. A property may be significant under multiple criteria. However, only one is necessary to meet the conditions for national significance. Nominations using multiple NHL Criteria are not stronger or better nominations, or more likely to be designated, than those that use a single NHL Criterion. Discussion about which NHL Criteria best apply to a property occurs during the first steps of the NHL process.

A nomination applying more than a single NHL Criterion must fully document why each criterion applies to the property. This does not imply that a nomination must use separate arguments for each NHL Criterion, although this is possible. Rather, the discussion of national significance could meet the requirements of more than one NHL Criterion, if the narrative appropriately addresses each of them.

CRITERION 1: *Properties that are associated with events that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained.*

Criterion 1 takes in all aspects of American history and properties associated with either major events and/or broad patterns. Under Criterion 1, a nominated property possesses one of the strongest associations possible with a nationally significant historical event or pattern. The period of significance for a singular event should be defined as the time when the event occurred, while the period of significance for historical patterns or trends is defined as the span of time during which the property actively contributed to the trend.



**LYDIA PINKHAM HOUSE,
LYNN, MASSACHUSETTS**

(DESIGNATED AUGUST 25, 2014)

The Lydia Pinkham House is nationally significant for its association with Lydia Pinkham and the Lydia E. Pinkham Medicine Company. Patented in 1866, Lydia Pinkham's Vegetable Compound was one of the most widely marketed patent medicines during the late-nineteenth and early-twentieth centuries. At this time, Americans relied heavily on patent medicines developed within an unregulated medical marketplace containing any ingredient to self-medicate. The arguments for Lydia Pinkham as a nationally significant individual (Criterion 2) exist in tandem with the national significance of her company and the history of nineteenth-century patent medicines (NHL Criterion 1). NPS IMAGE BY ROGER REED, JUNE 2013



**CASA JOSÉ ANTONIO NAVARRO,
SAN ANTONIO, TEXAS**

(DESIGNATED DECEMBER 23, 2016)

Casa Navarro is nationally significant under Criterion 2 as the home of Tejano statesman and historian José Antonio Navarro. Navarro was a political leader whose prolific career as a statesman and defender of Tejano rights shaped the destiny of Texas as an independent republic and, ultimately as part of the United States. The house was his primary urban residence from around the time of its purchase until the end of his life. Navarro lived here in the 1850s while writing and publishing his essays on Tejano history that served as a direct counter to standard Anglo accounts. NPS IMAGE BY LISA DAVIDSON, MAY 2022



CRITERION 2: *Properties that are associated importantly with the lives of persons nationally significant in the history of the United States.*

Criterion 2 is used for properties associated with individuals who have made a significant or exceptional contribution to American history. The individual's association with the property must directly connect to the specific period when they made their contributions to American history, and the activity for which they are recognized as nationally significant. Properties designated under Criterion 2 are often a primary residence or workplace. Properties not directly associated with an individual's significant accomplishments, such as birthplaces, childhood homes, vacation homes, retirement homes, or where they died, are usually not considered to be good candidates for NHL designation. In some cases, it is possible that an individual might be nationally significant for multiple reasons. Such a situation might warrant the designation of more than one property associated with the same individual, but with distinct justifications. These reasons could involve accomplishments attained by the individual at different times of their life, or in different areas of history.

For example, the Frick Collection and Frick Art Reference Library Building (Period of significance: 1912–35; NHL, 2008) recognizes Henry Clay Frick's nationally significant art collecting activities and the establishment of one of the nation's greatest art museums. The wealth that permitted Frick to engage in these activities came from his central role in the rise and dominance of the Pittsburgh steel industry in the late nineteenth and early twentieth centuries. It is conceivable that his significance as a business leader could be documented and recognized through another NHL.



FREEDOM TOWER, MIAMI, FLORIDA
(DESIGNATED OCTOBER 6, 2008)

The Freedom Tower is designated under Criterion 1 for its role as the Cuban Assistance Center during a twelve-year period between 1962 and 1974, offering nationally sanctioned relief to Cuban refugees who sought political asylum from the communist regime of Fidel Castro. The Freedom Tower stands as the single-most identifiable building associated with the Cuban exile experience, and is a physical manifestation of the Cold War-era politics that enshrined the concept of democracy above all others, therefore meeting NHL Criterion 3. NPS IMAGE BY CARLOS LLANO, APRIL 2007

**U.S. POST OFFICE AND COURTHOUSE
(JAMES R. BROWNING U.S. COURT OF
APPEALS), SAN FRANCISCO, CALIFORNIA**
(DESIGNATED OCTOBER 16, 2012)

San Francisco's U.S. Post Office and Courthouse is nationally significant under NHL Criterion 4 as a superlative Beaux-Arts public building constructed between 1897 and 1905 per a design by the federal government's Office of the Supervising Architect of the Treasury. It exhibits a complex merger of several artistic disciplines: architecture, sculpture, painting, stained glass, and decorative arts. The designers and fabricators incorporated rich materials collected from places around the world into a single design that outstandingly represents a Beaux-Arts "unity of the arts." COURTESY OF THE CAROL M. HIGHSMITH ARCHIVE, PRINTS AND PHOTOGRAPHS DIVISION, LIBRARY OF CONGRESS, 2009

A period of significance under Criterion 2 should correspond to both the time during which a person's nationally significant activities occurred and the person's direct association with the property (indirect association with the property is not sufficient). The period could be the entire duration of the property's association with the person, or it might only be a portion of that time. The years that a nationally significant individual owned, occupied, or used a property do not automatically equate to its period of significance.

Criterion 3: *Properties that represent some great idea or ideal of the American people.*

Criterion 3 applies to properties that represent an overarching belief, principle, or goal of the American people. NHLs designated under this criterion are associated with endeavors or goals of the highest order, such as attaining democracy, achieving freedom, and securing fundamental rights. A property eligible for NHL designation under Criterion 3 would also typically be eligible under Criterion 1. Since a property's significance can often be fully explained under Criterion 1, Criterion 3 is rarely used and its application requires careful scrutiny. The period of significance for properties under Criterion 3 is typically the span of time during which the property actively contributed to the development of, or was most associated with, the idea or ideal.

Criterion 4: *Properties that embody the distinguishing characteristics of an architectural type specimen exceptionally valuable for a study of a period, style or method of construction, or that represent a significant, distinctive and exceptional entity whose components may lack individual distinction.*

NHL Criterion 4 is used for properties that are nationally significant works of design which are among the best examples of an important type, period, style, form, function, or construction method (including engineering). A property cannot merely be a competent design or representative example. Rather, it must be a nationally significant design or have had nationally significant influences.



**BALTUSROL GOLF CLUB,
SPRINGFIELD, NEW JERSEY**

(DESIGNATED AUGUST 25, 2014)

Baltusrol Golf Club's Upper and Lower Courses constitute an outstanding and significant example of the work of golf course architect Albert W. Tillinghast. Tillinghast was a prolific writer on golf course design, one of the first American golf architects to integrate the golf course into nature, and the period's primary proponent of the strategic course. As a landscape, Baltusrol has evolved over the years, yet retained the character-defining features of Tillinghast's design philosophy, and is, therefore, nationally significant under NHL Criterion 4. NPS IMAGE BY JAMES LUM, AUGUST 2013

Nevertheless, more than one property could receive NHL designation as the best example of an important type, period, style, form, function, or construction method, so long as each property meets the three conditions for ascribing national significance.

Nationally significant architects and engineers are typically recognized through the designation of their works under Criterion 4 rather than under Criterion 2. The evaluation of a designer's impact on their respective fields should be based on scholarly assessment. For some designers, a single work may be enough to document the nationally significant aspects of their careers. For others, the length, evolution, output, and/or influence of their careers might warrant multiple NHLs. Very rarely, a designer is of such immense significance—for example the national and global reach of Frank Lloyd Wright—that multiple works may be considered for NHL designation under Criterion 4, in addition to a home or workplace that might also be designated under NHL Criterion 2. Not all works of a documented master designer are considered eligible for NHL designation; but rather only those found to be nationally significant benchmarks within their career.

The period of significance for buildings, landscapes, and works of engineering, art, and design should correspond to the timespan of original construction or execution, and/or the dates of any alterations or additions that contribute to its national significance.



**DEADWOOD HISTORIC DISTRICT,
DEADWOOD, SOUTH DAKOTA**

(DESIGNATED JULY 4, 1961)

Established in 1876, Deadwood is nationally significant under Criteria 1 and 5 as a late-nineteenth century mining boom town. Deadwood was central to the Black Hills Gold Rush of the 1870s and 1880s, and attained a high level of popular recognition. None of the resources contributing to the district are considered nationally significant on their own. However, as most of the buildings date from Deadwood's heyday, they collectively "compose an entity of exceptional historical" significance and illustrate a way of life—in this case, a booming western mining town. COURTESY OF THE CAROL M. HIGHSMITH ARCHIVE, LIBRARY OF CONGRESS, PRINTS AND PHOTOGRAPHS DIVISION, N.D.



Criterion 5: *Properties that are composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition but collectively compose an entity of exceptional historical or artistic significance, or outstandingly commemorate or illustrate a way of life or culture.*

Criterion 5 acknowledges the importance of districts—groups of buildings, structures, objects, and/or sites—in conveying national significance. The group of resources—the district—is collectively recognized as nationally significant; however, in most cases each of the component resources would not individually meet the requirements for NHL designation.

The federal regulations state that properties considered under Criterion 5 constitute “an entity of exceptional historical or artistic significance, or outstandingly commemorate or illustrate a way of life or culture.” With this in mind, an argument made for national significance under Criterion 5 would likely provide enough information to be also considered under one or more of the other NHL Criteria, in all likelihood Criterion 1 and/or Criterion 4, guiding the establishment of a period of significance for the district. It is not required that a property being considered under Criterion 5 use “district” in its name. However, properties defined as a district will in most cases also need to address Criterion 5.

Criterion 6: *Properties that have yielded or may be likely to yield information of major scientific importance by revealing new cultures, or by shedding light upon periods of occupation over large areas of the United States. Such sites are those which have yielded, or which may reasonably be expected to yield, data affecting theories, concepts and ideas to a major degree.*

Criterion 6 applies to properties having high potential to reveal significant information about the past through scientific investigation. Although Criterion 6 is not limited to identifying archeological significance, it was primarily intended



**CARRIZO PLAIN
ARCHEOLOGICAL DISTRICT,
SAN LUIS OBISPO COUNTY, CALIFORNIA**
(DESIGNATED MARCH 2, 2012)

The Carrizo Plain Archeological District contains one hundred important, intact archeological sites that include rock art panels and motifs, village midden deposits, camps, cupule sites, surface lithic scatters, quarries, rock cairns, and bedrock mortar localities dating from about 8500 BCE–1750 CE. Collectively, these constitute a nationally significant archeological district under Criterion 6, having the potential to illuminate understanding of the earliest inhabitants of the far western United States. COURTESY OF BOB WICK, BUREAU OF LAND MANAGEMENT, PUBLIC DOMAIN, [HTTPS://FLIC.KR/P/TKRIBB](https://flic.kr/p/TKRIBB), MARCH 2017

to recognize archeological properties. For example, it would be possible to develop a nomination under Criterion 6 that discusses a seventeenth-century timber frame building's potential to yield information about early American construction methods and building traditions, should its interior or exterior wall cladding ever be removed. For most properties, however, Criterion 6 is invoked when an archeological site is considered nationally significant for its data potential or for what could be learned from its cultural deposits if they were to be systematically excavated and studied.

Criterion 6 is distinctive in how it is used to frame a property's national significance. Broadly speaking, developing an argument for national significance under any of the other NHL Criteria is based on what is already known and/or can be firmly documented about a property and its national significance. In most instances, one can visually see the evidence of this significance. In contrast, Criterion 6 explores the aspects of a property that hold the potential to yield information in the future—most of which may be unseen upon a superficial examination.

Properties considered under Criterion 6 must address these two questions:

- What significant information is the site likely to yield?
- Is the information nationally important?

Answers to both questions must be well supported and logically organized in a nomination. To establish an archaeological resource's national significance, the discussion must also demonstrate how data obtained from the property has made or will make a major contribution to understanding of a particular subject, and how that data is exceptionally important compared to similar properties within the same theme or historic context. Criterion 6 requires that potentially recoverable data is likely to markedly alter a major historic concept, resolve a substantial historical or anthropological debate, or close a serious gap in the understanding of a major theme of American history.

It also is necessary to explicitly determine the connection between the important information and a property. This discussion must include specific, important research questions that may be answered by the data contained in the property, and the demonstrated ability to successfully answer these questions. The latter must be supported by documented evidence, most commonly comprised of existing scholarship and the results of previous research conducted at the property, and include discussion of the disposition of any collections. An argument

**BIRNIRK SITE,
NORTH SLOPE BOROUGH, ALASKA**

(DESIGNATED DECEMBER 29, 1962)

The Birnirk Site on the coast of the Chukchi Sea near Barrow, Alaska, known locally as Pigniq, is nationally significant under Criterion 6 as the “type site” for the Birnirk archeological culture, providing valuable data on the earliest manifestation of the Iñupiat culture in North America. The landmark consists of a series of approximately twenty mounds on beach ridges, which reach up to fourteen-feet in height and are dimpled with the sunken remains of house ruins and cache pits. Important research questions informed by the Birnirk Site have focused on understanding the developments that occurred during the Birnirk period and have helped researchers explain the common languages and cultures of Iñupiaq speakers in northern Alaska and Canada. NPS IMAGE BY JEFF RASIC, AUGUST 2015



demonstrating a property’s national significance under Criterion 6 can be further bolstered by examining how studies of comparable sites throughout the nation have utilized such evidence in answering similar or related questions.

In general, Criterion 6 research questions should relate to property-specific issues, to broader questions about a larger geographic area, or to theoretical issues independent of any particular geographic location. There must be sufficient evidence that cultural deposits exist to support the potential fulfillment of these questions, as well as their ability to yield important information. This support most often comes from previously completed excavations and studies of a site that demonstrate both that cultural deposits still exist at a site and their recognized level of high integrity.

The high integrity of nationally significant archeological properties hinges upon the research potential of their undisturbed deposits. Therefore, partly excavated properties or those that are otherwise disturbed must be shown to retain the potential to yield important information in their remaining, unexcavated areas. The existence of in situ deposits in a property is inferred by information furnished through previous surveys, excavations, and documentary analysis. An appraisal of extant deposits may also cite evidence from nondestructive methods such as geophysical surveys including soil resistivity, magnetometer survey, metal detecting, LiDAR, or a host of other nondestructive analyses that reliably attest to the integrity of a site’s relevant deposits or features.

Properties that have yielded important information in the past, but no longer retain additional research potential (such as completely excavated archeological sites), generally do not qualify for designation under Criterion 6, and should be assessed under NHL Criterion 1 instead. To be significant under Criterion 6, such properties must have nationally important associative values related to the importance of the data gained, or the impact of the property in the history of the fields of anthropology/archeology or other related disciplines.

The significance of archeological properties may also be considered under other NHL Criteria, in addition to Criterion 6. Inclusion of additional NHL Criteria can provide a richer understanding of the property’s history and significance, even if not required for designation. Conversely, a property not considered for its archeological significance under Criterion 6 may still have been the location of archeological investigations. If this information is known, a nomination should include a brief discussion of the site’s archeology, regardless of its NHL Criteria. NHL staff archeologists can assist in deciding whether the archeology warrants specific mention and to what degree. Archeological reports are often excellent sources of site-specific and contextual understanding of a property being considered under NHL Criteria 1 through 5, and should be consulted in the process of researching and writing a nomination. At minimum, a nomination should note that archeological excavations have been conducted on the property.

The period of significance for properties considered under Criterion 6 can vary considerably. For precontact properties, periods of significance often correspond to the broad span of time about which the place is likely to provide information, sometimes extending for centuries or even millennia. Evidence such as historical records, time diagnostic artifacts, stratigraphic documentation, and/or radiocarbon dates should be provided in the discussion to justify a period of significance.

NHL Exception 1
RELIGIOUS PROPERTIES

NHL Exception 2
MOVED PROPERTIES

NHL Exception 3
**SITES OF BUILDINGS OR STRUCTURES
NO LONGER STANDING**

NHL Exception 4
BIRTHPLACES OR GRAVES

NHL Exception 5
CEMETERIES

NHL Exception 6
RECONSTRUCTED PROPERTIES

NHL Exception 7
COMMEMORATIVE PROPERTIES

NHL Exception 8
**PROPERTIES LESS THAN
50 YEARS OLD**

**ARCH STREET FRIENDS MEETING HOUSE,
PHILADELPHIA, PENNSYLVANIA**
(DESIGNATED JUNE 23, 2011)

The Arch Street Friends Meeting House was designated an NHL under NHL Exception 1 as the home of the Philadelphia Yearly Meeting (PYM) of the Religious Society of Friends and is nationally significant under Criterion 1 as a representation of the Enlightenment ideal of liberty of conscience. This ideal was a decisive factor in the formation of American democracy and equality. It is also nationally significant under NHL Criterion 4 for its association with Quaker master builder and builder's handbook author Owen Biddle, and as an embodiment of the Plain-style architectural form favored by the Friends. NPS/HABS IMAGE BY JOSEPH E.B. ELLIOTT, 1999

NHL CRITERIA EXCEPTIONS

The federal regulations define eight NHL Criteria Exceptions under which certain types of properties require special consideration in order to be designated as NHLs. In introducing the NHL Exceptions, the federal regulations at 36 CFR § 65.4 state:

Ordinarily, cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings and properties that have achieved significance within the past 50 years are not eligible for designation. Such properties, however, will qualify if they fall within the following [eight] categories.¹

Each of the NHL Exceptions is individually addressed below.

The NHL Exceptions are not exclusions to designation, but rather call for a higher level of scrutiny when demonstrating whether a property meets the conditions of becoming an NHL, according to the qualitative framework. The reasons that certain categories of properties require an additional level of scrutiny are varied and logical. Properties that represent the births or deaths of important individuals, birthplaces, graves, and cemeteries may be far removed from their nationally significant activities; properties owned by religious institutions or used for religious purposes run the risk of suggesting government support of a particular religion; relocated and reconstructed buildings, or buildings and structures that are no longer standing, may have suffered a loss of integrity; and properties less than fifty years of age may not be old enough to permit an objective assessment of significance.

Properties for which NHL Exception 2 (relocated buildings/structures), NHL Exception 3 (building or structure no longer standing), and NHL Exception 6 (reconstructed building or structure) apply will have shortcomings in certain aspects of integrity. Through the qualitative framework, a nomination must justify





**HOUSE OF THE SEVEN GABLES
HISTORIC DISTRICT,
SALEM, MASSACHUSETTS**
(DESIGNATED MARCH 29, 2007)

The House of the Seven Gables Historic District is a seminal Colonial Revival restoration undertaken in 1909 by leading restoration architect Joseph Everett Chandler. The small complex of buildings represents historic preservation practices of the early twentieth century including the relocation of buildings to this property, thus meeting NHL Exception 2. One of the earliest houses in the country to be restored to its seventeenth-century exterior appearance, the House of the Seven Gables had a significant influence on later restorations. In addition to including the house that came to be associated with Nathaniel Hawthorne's famous novel of the same name, the district includes Hawthorne's birthplace, which was moved to the property in 1958. NPS IMAGE, PHOTOGRAPHER UNKNOWN, N.D.

why this reduced integrity still permits a property to meet the required condition of a high degree of integrity.

Four of the NHL Exceptions (2, 3, 4, and 5) require demonstration of the “transcendent” significance of a person, event, or topic in history. The federal regulations do not define this term, but transcendent usually indicates that a nationally significant person, event, or topic in history must exceed the “usual limits” of significance or surpass “others of its kind.”^[2] Such persons, events, or topics in history might be considered “first among equals” in terms of their significance. For example, many individuals contributed significantly to the modern American Civil Rights Movement, but Martin Luther King Jr. would be considered of transcendent importance to the movement.

Concluding that a particular person, event, or topic in history surpasses the usual levels of significance should be determined using the same methods employed when demonstrating that a property meets the conditions for NHL designation. A property designated as an NHL where NHL Exceptions 2, 3, 4, or 5 apply is equal in status to any other NHL.

For districts, NHL Exceptions generally apply if one or more contributing resources within the district meet the definition of any of the NHL Exceptions. If a resource is noncontributing to a district, then the application of an NHL Exception(s) is not required. Proponents are advised to check with NHL Program staff to determine whether a property still qualifies for possible NHL designation, if it appears to relate to any of the NHL Exceptions listed below.

Exception 1 – *A religious property deriving its primary national significance from architectural or artistic distinction or historical importance.*

Nomination of a religious property requires justification on architectural, artistic, or historical grounds to avoid any appearance of judgment by the government about the endorsement of any religion or belief. This exception must be considered if: the resource was constructed by a religious institution; the resource is presently owned by a religious institution or is used for religious purposes; and/or the resource was owned by a religious institution or used for religious purposes during its period of significance.

Exception 2 – *A building or structure removed from its original location but which is nationally significant primarily for its architectural merit, or for association with persons or events of transcendent importance in the nation's history and the association consequential.*

The connection between a place and nationally significant history is at the core of what it means to be an NHL. Moving a building or structure can have a detrimental effect on this connection. Relocating a property directly impacts its integrity of location, setting, feeling, and sometimes association, such that it results in

**HAMILTON GRANGE,
NEW YORK, NEW YORK**

DESIGNATED DECEMBER 19, 1960;
UPDATED DOCUMENTATION/BOUNDARY
REVISION - OCTOBER 16, 2012

Hamilton Grange is nationally significant for its association with Alexander Hamilton, one of America's influential founding fathers. The building meets NHL Exception 2 for a moved building as the only surviving property importantly associated with Hamilton, a figure who surpasses the usual level of national significance. First moved in 1889 as development in Manhattan marched northward, in time it became hemmed-in by a church and an apartment building. In 2008, NPS relocated the building one block to a park-like environment, identified as early as 1908 as an appropriate location to recapture some of the house's lost setting. NPS
IMAGE BY CARIDAD DE LA VEGA, JULY 2016



the loss of a high degree of integrity. While “architectural merit” is one reason for applying Exception 2, the exception is more commonly utilized for buildings or structures associated with a person, event, or topic in history having transcendent importance, and for which there is no other property with the same association that meets the requirements for NHL consideration—arguments derived from a nomination’s comparative analysis.

If relocated, a property’s loss of integrity must be offset by maintaining an orientation, setting, and general environment comparable to its historic location and compatible with the property’s significance. A property designed to be moved or whose movement was a feature of its historic use during the period of significance must be located in a historically appropriate setting to qualify under Exception 2. It is advisable that property owners who wish to move a building or structure that is part of an NHL should contact the NHL Program to discuss how this might potentially affect the designation.²

Exception 3 – *A site of a building or structure no longer standing but the person or event associated with it is of transcendent importance in the nation’s history and the association consequential.*

The conditions necessary for meeting Exception 3 are uncommon, and it is only rarely used. In addition to demonstrating that a person or event associated with a property surpasses the usual levels of significance, a nomination must also document that no other standing buildings or structures related to the person



or event might be more appropriate for NHL designation. Additionally, meeting Exception 3 requires that a property played a major, not a minor or peripheral, role in the national significance attributed to the person or event. Properties where Exception 3 might apply could benefit from consideration under NHL Criterion 6 for archeological significance.

**W. E. B. DUBOIS BOYHOOD HOMESITE,
GREAT BARRINGTON, MASSACHUSETTS**
(DESIGNATED MAY 11, 1976)

W.E.B. DuBois was a key leader of the African American civil rights movement during the first half of the twentieth century. As one of the founders of the Niagara Movement and the National Association for the Advancement of Colored People (NAACP), he authored more than twenty books and several hundred articles. From 1868 to 1885, he spent the first seventeen years of his life at his family’s Great Barrington home. DuBois subsequently lived in Massachusetts, Ohio, Pennsylvania, Georgia, and Maryland, and traveled extensively internationally. He returned to the Great Barrington home often after friends purchased it for him in 1928. The house was demolished sometime after DuBois sold it in 1954. This NHL meets NHL Exception 3 because at the time of its designation no other properties associated with DuBois’s life or work were known to exist and he also rises above the usual levels of national significance necessary for NHL designation. COURTESY OF DANIEL CASE, WIKIMEDIA COMMONS, CC BY-SA 3.0, [HTTPS://BIT.LY/3Y1XK44](https://bit.ly/3Y1XK44), OCTOBER 2010

**WYANDOTTE NATIONAL BURYING
GROUND (ELIZA BURTON CONLEY
BURIAL SITE), KANSAS CITY, KANSAS**
(DESIGNATED DECEMBER 23, 2016)

This burying ground serves as tangible evidence of the consequences of federal American Indian policy during the nineteenth century, particularly the consequences of removal policies for a tribal population and its identity. The property is also associated with the life of attorney Eliza (Lyda) Burton Conley who is nationally significant for waging the historic legal battle to save this sacred American Indian burying ground from destruction. Her legal case to save the cemetery reached the U.S. Supreme Court in 1910, the first case ever argued by an American Indian attorney, and only the second by a woman. Almost all the Wyandot leaders from the Removal era are buried in the cemetery, including Conley who was also laid to rest here upon her death in 1946. She spent her life defending this cemetery from destruction, so it is therefore fitting that her grave is located within the property most closely associated with her life and nationally significant activities. Thus it meets NHL Exception 4. NPS IMAGE, 2013

Exception 4 – *A birthplace, grave or burial if it is of a historical figure of transcendent national significance and no other appropriate site, building or structure directly associated with the productive life of that person exists.*

The lives of persons nationally significant in the nation's past are typically recognized by the designation of properties illustrative of or associated with their productive lives. Birthplaces, graves, and burials are commonly excluded from this type of recognition, because they usually do not represent a person's nationally significant activities. However, if all other properties directly associated with a person's productive life are gone or have lost integrity, and the person's contributions surpass the usual levels of national significance, a birthplace or grave may be considered appropriate for designation. If the birthplace is the location of the nationally significant person's productive contributions, or if the grave is located on the grounds of a property where the nationally significant person spent his or her productive years, then the property does not need to meet this exception.

Exception 5 – *A cemetery that derives its primary national significance from graves of persons of transcendent importance, or from an exceptionally distinctive design or from an exceptionally significant event.*

While having varied meanings and importance to the living, as with individual graves, cemeteries represent the end of life for interred individuals and usually have no direct association with the activities of their lives. Exception 5 should be applied to a cemetery property or a property that includes a cemetery, if it contains the graves of persons of transcendent importance, constitutes an "exceptionally distinctive" landscape design, or was the location of an "exceptionally significant"



**CONGRESSIONAL CEMETERY,
WASHINGTON, DC**

(DESIGNATED JUNE 14, 2011)

Viewed as early as the 1820s as the “national burying ground,” the cemetery’s most overt and wholly unique representation of the federal presence was the design and construction of its austere, neoclassical Congressional cenotaphs, which mark the graves of U.S. Congressmen who died while in office. The cenotaphs are grouped along a ceremonial entranceway, which was once connected to the Capitol by a special graded route. This roadway was significant in that it both physically tied the burial ground to the seat of government and played an integral role in early expressions of national mourning and public memorialization of national and civic leaders. Exception 5 applies because Congressional Cemetery is nationally significant as a unique designed landscape and because of its historic role as an early “national” cemetery prior to creation of the national military cemetery system during the Civil War. COURTESY OF THE CAROL M. HIGHSMITH ARCHIVE, LIBRARY OF CONGRESS, PRINTS AND PHOTOGRAPHS DIVISION, 2010



event. If Exception 5 is applied for the presence of graves of individuals, then the requirements for applying Exception 4 must also be met. A cemetery nominated with its associated church does not need to meet this exception when the church is the focus of the nomination. In addition, if a cemetery is nominated as part of a district and it is not the focal point of the district, this exception does not apply.

Exception 6 – *A reconstructed building or ensemble of buildings of extraordinary national significance when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other buildings or structures with the same association have survived.*

The Secretary of the Interior’s Standards define reconstruction as “the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.”³ A reconstruction considered for NHL designation under this exception may wholly utilize new materials or be reassembled using historic and new mate-

**OLD SALEM HISTORIC DISTRICT,
WINSTON-SALEM, NORTH CAROLINA**

(DESIGNATED NOVEMBER 13, 1966;
UPDATED DOCUMENTATION/BOUNDARY
REVISION DECEMBER 23, 2016)

Originally designated in 1966 for its history as a Moravian/German theocratic settlement from 1766 to 1856, the Old Salem Historic District received updated documentation and a boundary change in 2016. Among the changes was a second period of significance (1948–2010), which expanded the original designation context by explaining Old Salem’s role in the history of historic preservation, historical archeology, and historic restoration and reconstruction. Guided by a master plan and meticulous research, the reconstructed buildings and structures from the period of significance were accepted as contributing resources under NHL Exception 6. NPS IMAGE BY MARTHA B. HARTLEY, APRIL 2013



rials. As with moved buildings or structures, however, evaluating a reconstructed property's national significance under Exception 6 must take into account both its degree of significance and its loss of integrity, especially of materials and workmanship.

Exception 6 stipulates that a reconstruction must be based on sound archeological, architectural, and historical data derived from the construction and appearance of the original resource during its period of significance. The reconstructed property must be located at the same site as the original; it must be situated in its original grouping of buildings, structures, and objects (as many as are extant); and this grouping must retain a high degree of integrity. In addition, the reconstruction must not be misrepresented as an authentic historic property, and it must be part of an overall restoration master plan. After the passage of fifty years, a reconstruction may qualify for NHL designation if it has achieved national significance in its own right, rather than for any association with the historic period it depicts.

Exception 7 – *A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own national historical significance.*

Commemorative properties are designed or constructed after the occurrence of an important historic event or after the life of an important person. They are not directly associated with the event or with the person's productive life, but serve as

**HAYMARKET MARTYRS' MONUMENT,
FOREST PARK, ILLINOIS**
(DESIGNATED FEBRUARY 18, 1997)

The Haymarket Martyrs' Monument commemorates workers' struggle to achieve the eight-hour workday in America and throughout the world and the bombing of an 1886 labor rally in Haymarket Square in Chicago. The bombing led to the hangings of four leaders in the fight for workers' rights. The "martyrs" are buried beneath the monument, which was constructed to pay homage to these individuals and workers' continuing quest for justice. Annually on May 1 (May Day) and November 11 (the anniversary of the martyrs' execution), people from all over the nation and the world have come to this property to discuss issues of free speech, workers' rights, and social democracy. Since the monument has achieved its own national significance, it meets NHL Exception 7. COURTESY OF STEPHEN HOGAN, FLICKR, CC BY 2.0, [HTTPS://FLIC.KR/P/X5BFXA](https://flic.kr/p/X5BFXA), AUGUST 2017



**AMES MONUMENT,
ALBANY COUNTY, WYOMING**

(DESIGNATED OCTOBER 31, 2016)

Constructed between 1881 and 1882 in southeastern Wyoming, the Ames Monument was conceived by the Union Pacific Railroad as a memorial to the brothers Oakes Ames and Oliver Ames and their role in building the Union Pacific Railroad. Although commemorative in intent, the Ames Monument's design is a pivotal and highly significant work in the career of architect Henry Hobson Richardson, thus meeting NHL Exception 7 and designated under NHL Criterion 4 for its design. NPS IMAGE BY RICHARD COLLIER, JUNE 2014



evidence of subsequent assessment of the past. Exception 7 must be applied when considering any commemorative property, regardless of how it derives its national significance.

To fulfill Exception 7, a commemorative property must possess significance on its own and not for the value of the event or person being memorialized, regardless of the event or person's level of significance. Most properties that meet this exception are recognized as important cultural expressions at the time of their creation or for significance garnered separate and apart from the event or person they commemorate. A commemorative property's national significance is not strengthened by the loss of other properties directly associated with the commemorated event, person, or topic in history, as they typically do not have direct historical associations with the event or person. A single marker that is a component of a district typically does not need to meet this exception.

**KLAGETOH (LEEGITO) CHAPTER HOUSE,
ARIZONA**

(DESIGNATED JANUARY 13, 2021)

This building was designated under Criterion 2 for its association with one of the most celebrated and influential Native Americans of the twentieth century, Annie Dodge Wauneka. The second and longest-serving woman elected to the Navajo Tribal Council (1951-1979), Wauneka participated in the creation of the modern Navajo Nation through her efforts on a wide range of critical issues such as health care and education. The period of significance for the Klagetoh Chapter House extended from its construction in 1963 to the end of Wauneka's service on the Tribal Council in 1979. This public building was determined to best represent Wauneka's extraordinarily significant life of service and to be eligible for designation under NHL Exception 8. NPS IMAGE BY THOMAS H. SIMMONS, c. 2017

Exception 8 – *A property achieving national significance within the past 50 years if it is of extraordinary national importance.*

Exception 8 involves a fixed amount of time commonly known as the "50-year rule." It is, however, not intended as a hard and fast rule, but rather a means to help ensure the objective assessment of nationally significant resources from the



recent past. Exception 8 involves a single question: has enough time passed to provide adequate historical perspective and context to accurately assess a property's national significance? This question is answered through the qualitative framework for ascribing national significance and a solid grounding in established scholarly investigations of the topic. If a nominated property's national significance is not already demonstrated through existing scholarship, then it is typically difficult, although not impossible, to successfully argue a property's extraordinary national importance under this exception.

Exception 8 generally applies when a property's entire period of significance occurred less than fifty years ago; or the period of significance began more than fifty years ago, but it ended less than fifty years ago.

Exception 8 is associated only with the period of significance, not a property's physical age. Avoiding Exception 8 and the need to demonstrate the "extraordinary national importance" of a property should not be a primary driver in establishing a property's period of significance. The period of significance should be the date range that makes the most sense based on the property and the argument for its national significance. On occasion, it might not be possible to justify a period of significance's end date that is less than fifty years old, or a property may have ongoing significance. In such cases, it is generally recommended that a date fifty years before the year of the nomination be utilized.

**MAY 4, 1970, KENT STATE
SHOOTINGS SITE, KENT, OHIO**

(DESIGNATED DECEMBER 23, 2016)

The May 4, 1970, Kent State Shootings Site is where student protests against the Vietnam War ended in tragedy with the Ohio National Guard shooting and killing four Kent State students and wounding nine. The site has two periods of significance. The first is the four-day period in 1970 when the events and protests that culminated in the shootings occurred. The second, from 1977 to 1978, is when objections were raised regarding Kent State University's plan to construct a gym annex on part of the site, and a larger discussion occurred about the site's recent history, its preservation, and the appropriate commemoration of the events of 1970. Although both distinct periods of significance occurred entirely within fifty years of the NHL designation, the event's level of national significance met the requirement for NHL Exception 8. NPS

IMAGE BY MARK SEEMAN, DECEMBER 2006



CHAPTER 6

INTEGRITY

EDMUND PETTUS BRIDGE, SELMA, ALABAMA

(DESIGNATED FEBRUARY 27, 2013)

On March 7, 1965, local and state law enforcement officers attacked peaceful civil rights marchers crossing this bridge en route to Montgomery, the state capitol. Television and newspaper coverage of “Bloody Sunday,” as the attack became known, shocked the American public and dramatized the need for voting rights, prompting President Lyndon Johnson to submit such legislation to Congress. This legislation became the Voting Rights Act of 1965. NPS IMAGE BY CYNTHIA WALTON, JUNE 2012

Evaluating whether a property maintains a high degree of integrity is essential to demonstrating that a property meets NHL requirements for national significance. The federal regulations at 36 CFR Part 65 state that to be eligible for NHL designation, a property must “possess a high degree of integrity of location, design, setting, materials, workmanship, feeling, and association.” The evaluation of integrity is one part of the qualitative framework’s three interrelated conditions required to ascribe national significance to a property and achieve NHL designation (see Chapter 1). This chapter introduces the seven aspects of integrity, how to develop a well-reasoned assessment of these aspects, and what it means for a property to retain a high degree of integrity. It also examines how this assessment relates to the other parts of the qualitative framework.

Integrity is a measure of how a property physically conveys its national significance. If a property does not convey its national significance to a high degree, then it does not retain sufficient integrity for NHL designation. The expectation that NHLs must have a high degree of integrity is greater than that required by other registration programs, such as the National Register of Historic Places.



ASPECTS OF INTEGRITY

- 1 LOCATION
- 2 DESIGN
- 3 SETTING
- 4 MATERIALS
- 5 WORKMANSHIP
- 6 FEELING
- 7 ASSOCIATION

PAINTED DESERT COMMUNITY COMPLEX, PETRIFIED FOREST NATIONAL PARK, APACHE COUNTY, ARIZONA
(DESIGNATED DECEMBER 23, 2016)

Painted Desert Community Complex is significant as an International Style park headquarters designed by renowned architects Richard J. Neutra and Robert E. Alexander as part of the ten-year long Mission 66 program to modernize national park facilities. The desert landscape influenced the organization of the complex, in particular to shelter residents and users from wind. Its high degree of integrity of setting—both the larger desert landscape and the internal organization of the complex—are central to conveying its significance as a design. NPS IMAGE BY THOMAS H. SIMMONS, JANUARY 2016

THE SEVEN ASPECTS OF INTEGRITY

There are seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. As stipulated in the federal regulations, NHLs must retain a high degree of integrity as evaluated through these seven aspects to effectively convey their nationally significant historic associations or meanings. A high degree of integrity indicates that a physical resource has an elevated level of quality and completeness in its ability to convey its national significance. Among the seven aspects of integrity, five pertain directly to the measurable, physical characteristics of a resource and its surroundings.

LOCATION is the place where an individual made their nationally significant contributions, the place where the historic event or historic trend/pattern of events occurred, or where a historic property was constructed. A property's actual location, complemented by its setting, is particularly important for creating a tangible connection to historic events and persons. The correlation between a property and its location is also one of the most consequential factors in understanding why the property was created or why an associated event took place there. In many cases, the relationship between a property and its historic associations are irreparably diminished or destroyed if the property is relocated or moved. There are some circumstances under which a relocated property might still meet the conditions for NHL designation per the discussion of NHL Exception 2 in Chapter 5. However, sites and districts must retain integrity of location.

DESIGN is the combination of elements that create the form, plan, space, structure, type, and style of a property. It results from conscious decisions made during the original conception, planning, and realization of a property (or its significant



**STEEDMAN ESTATE (CASA DEL HER-
RERO), SANTA BARBARA, CALIFORNIA**

(DESIGNATED JANUARY 16, 2009)

The highly intact architecture, garden landscapes, and interior design of the Steedman Estate convey its national significance as an especially cohesive example of an American Country Place Era estate and sophisticated demonstration of Spanish Colonial Revival design. The estate's materials not only include the brick, stone, glazed tiles, stucco, wood, iron, and terracotta used to construct the house, and the stairs, retaining walls, and other hardscaping elements of its landscape design, but also the trees, shrubs, and plant materials of the gardens. NPS IMAGE BY MATT WALLA, 2008

alteration) and applies to activities as diverse as community planning, engineering, building and construction, architecture, art, and landscape architecture. Design includes such elements as organization of space, proportion, scale, color, technology, structural systems, ornamentation, and materials (including plant materials, circulation, and other landscape features). Consideration of a property's design can also inform an understanding of its historic functions and period aesthetics. Aspects of a property's design often directly correlate with intangible aspects of culture, such as the aspirations and the world view of a property's builders and users.

The design of districts moves beyond individual resources to consider the larger landscape, whether important primarily for their historic association, architectural value, information potential (primarily archeology), or some combination thereof. It takes into account the planned and sometimes unplanned relationships among the buildings, structures, objects, and sites within the district.

For archeological resources, integrity of design generally refers to the patterning of structures, buildings, or discrete activity areas relative to one another. Under Criterion 6, integrity of design for archeology most closely approximates intra-site artifact and feature patterning.

SETTING is the physical environment of a property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the character of the place in which the property played its historical role. It involves how, not just where, the property is situated in its environment, as well as



**PANAMA HOTEL,
SEATTLE, WASHINGTON**

(DESIGNATED MARCH 20, 2006)

The Panama Hotel, particularly its sento or public bathhouse on the lower level, remains largely the same today as it did when it was the center of Japanese American community life in Seattle during the first half of the twentieth century. The historic character and related integrity of feeling is most strongly expressed through the retention of spatial layouts and room relationships (integrity of design), and the extant original doors, windows, woodwork, flooring, railings, brass fittings, plumbing fixtures, and electrical fixtures (integrity of design, materials, and workmanship). NPS IMAGE BY JOHN STAMETS, SEPTEMBER 1995



**MUD LAKE CANAL, MONROE COUNTY,
FLORIDA**

(DESIGNATED SEPTEMBER 20, 2006)

The design of Mud Lake Canal is the most important aspect of both its national significance and its high degree of integrity because it is the best-preserved example of a rare prehistoric engineering feat—a long-distance canoe canal. The canal was dug by American Indians and may have been designed to provide safe passage, easy access to aquatic resources, and courses for exchange or tribute. Its design is recorded both above and below the ground in its banks, bed, and course. The course of the canal bends and curves to avoid high and low areas, indicating the canal builders understood local topography and hydrologic conditions. NPS IMAGE BY WILLIAM JERALD KENNEDY, 1965



its relationship to surrounding historic resources and spaces. Setting often reflects the basic physical conditions under which a property was built and the functions it was intended to serve. In addition, the way in which a property is positioned in its environment can reflect the designer's and/or creator's attitude toward nature and aesthetic preferences.

The physical elements that constitute a property's setting can be either natural or the result of human endeavor, including such things as topographic features, vegetation, and constructed components, such as other buildings, structures, and spaces. Consideration of a historic property's setting should take into account the environment both inside and outside the NHL boundary. The integrity of setting is particularly important in cases where a natural feature or landscape has traditional cultural significance for a group or community, is closely associated with intangible aspects of its culture, or the setting helps to define the significance of an event or the significant activities of an individual.

MATERIALS are the physical components (e.g., wood, stone, metal, concrete, plant materials) that were combined or deposited during a specific period of time and in a particular pattern or configuration to form a property. For constructed properties, the choice and combination of materials can reveal the preferences and traditions of those who created the property, the availability of particular types of materials, technologies, and skills, socioeconomic conditions, and building codes. Locally available materials are often the focus of regional building traditions and thereby help define a property's sense of time and place. Use of non-local materials can provide insights into trade routes, cultural contact, and the conveyance of materials and/or ideas and belief systems across geographic space.

A property should retain the key, character-defining materials dating from its period of significance. If a property was rehabilitated, the materials and features

**GEORGE NAKASHIMA
WOODWORKER COMPLEX,
BUCKS COUNTY, PENNSYLVANIA**

(DESIGNATED APRIL 22, 2014)

George Nakashima, one of America's preeminent furniture designer-craftsmen and an architect, designed and constructed the complex that served as his residence, workspace, and showroom. The complex's buildings retain a high degree of integrity of workmanship for a range of construction techniques, including: reinforced poured concrete for a conoidal shell roof; heavy timber framing, conventional concrete block walls, and masonry (stone) walls; and elements of traditional Japanese architecture such as tatami and sliding rice paper screens. The continued presence of his furniture, sculpture, and other works within the buildings enhance the experience of the place even while they do not contribute to its retention of a high degree of integrity. NPS/HABS IMAGE BY JAMES ROSENTHAL, 2012

present during its period of significance should in large part remain present, as they are often essential to telling the property's story. The property must also be an actual historic resource, not a re-creation. A recent structure fabricated with materials made to look historic is typically not considered eligible for NHL designation. In most cases, a property whose historic features and materials were lost and then reconstructed will not be considered eligible for NHL designation. However, there are rare exceptions under certain circumstances (see discussion of NHL Exception 6 in Chapter 5).

For archeological properties, integrity of materials may be assessed through the presence or absence of intrusive artifacts or features, the intactness of the artifact/feature assemblage, or the quality of artifact or feature preservation.

WORKMANSHIP is the physical evidence of the artisanry or handicrafts of a particular culture or people during any given period of history. It is the evidence of the creator's labor and skill in constructing or altering a building, structure, object, or site. Workmanship can apply to the property as a whole or to its individual components. It can be expressed in vernacular methods of construction and plain finishes, highly complex configurations and ornamental detailing, vernacular traditions, or techniques innovative to a particular time and place.

Workmanship is important because it can furnish evidence of a craft's technology, illustrate the aesthetic principles of a historic or precontact period, and



**RABIDEAU CIVILIAN CONSERVATION
CORPS CAMP, BELTRAMI COUNTY,
MINNESOTA**

(DESIGNATED FEBRUARY 17, 2006)

The Civilian Conservation Corps (CCC) was an important New Deal program that had a national impact on the American landscape. The CCC camps were the key component in the success of the program, creating the mechanism for executing its initiatives and providing a setting for the training and rejuvenation of the program's enrollees. Rabideau demonstrates integrity of feeling because it is a rare, unusually complete camp landscape representing the program's focus on forest management and conservation. The landscape consists of buildings and their interrelationships in a largely unmodified setting, containing open spaces, roads, paths, and vegetation, all dating to its period of national significance in the 1930s. NPS IMAGE BY ROLF ANDERSON, 2002.



reveal individual, local, regional, or national applications of both technological practices and aesthetic principles. Assessment of the quality of workmanship may include intangible values embedded in the process of production, in addition to consideration of the tangible physical outcomes. Examples of workmanship in historic buildings include surface decoration achieved through tooling, carving, painting, graining, turning, and joinery as well as construction practices such as framing, brick laying, and welding. Examples of workmanship in precontact contexts include the fashioning of projectile points, the crafting of pottery, and methods for hammering, cutting, and carving.

Two of the seven aspects of integrity—feeling and association—are more closely related to perceptions of a resource's physical characteristics. As such, assessment of these two aspects is more subjective (although not arbitrary). Because of this distinction, the retention of feeling or association alone is not sufficient to meet the NHL Program's required high degree of integrity. At times, a property's national significance argument may place a higher value on integrity of feeling or association than on other aspects when considering a property's overall integrity, particularly for properties imbued with intangible beliefs and ideas. Nevertheless, a property must still retain sufficient integrity of location, design, setting, materials, and/or workmanship to underpin conclusions about the aspects of feeling or association.

FEELING is a property's ability to convey the aesthetic or historic sense of a particular period of time, or to express the ties between cultural significance and a specific place. Integrity of feeling results from the presence of physical features that, collectively, convey the property's historic character or the relationship between a place and intangible aspects of culture. The requirement that an NHL retain a high



**MEDICINE MOUNTAIN/MEDICINE WHEEL,
BIG HORN COUNTY, WYOMING**

(DESIGNATED MAY 22, 1970; UPDATED DOCUMENTATION, BOUNDARY REVISION, NAME CHANGE JUNE 1, 2011)

Medicine Mountain NHL has high integrity of feeling largely based on its intact setting, which is dominated by Medicine Mountain. The high integrity also includes varied landforms and viewsheds, and the design of cultural elements such as the Bighorn Medicine Wheel with its circular pattern composed of stones and cairns. The nomination explains that, collectively, these elements “provide the district with a special sense of place and evoke the spiritual feeling and sense of reverence integral to tribal ceremonial and spiritual practices.” IMAGE BY US FOREST SERVICE, AUGUST 2002

degree of integrity means that, in most cases, enough of its historic fabric and/or setting remain to retain integrity of feeling.

For buildings, the ability to strongly express integrity of feeling usually corresponds to high levels of extant design, materials, and workmanship on both the exterior and interior. For districts, integrity of feeling is often closely linked to design, materials, and, especially, setting and spatial organization. For places imbued with cultural meanings and importance, a property’s location and setting can inform the degree to which it retains integrity of feeling. Properties being considered under Criterion 4 for architecture or design, whether high-style or more vernacular expressions, also often exhibit a high level of integrity of feeling, because national significance is demonstrated through the physical characteristics of the resource itself. Experiencing a property firsthand through on-site evaluation is a particularly valuable way to ascertain its retention of integrity of feeling.

**THE FORTY ACRES,
DELANO, CALIFORNIA**

(DESIGNATED OCTOBER 6, 2008)

The Forty Acres complex was purchased by the farmworker movement in 1968 and served as the administrative headquarters of the United Farm Workers of America (UFW) through the early 1970s. Under the leadership of César Chávez, the UFW successfully worked to secure collective bargaining rights which had been denied to farmworkers in the National Labor Relations Act of 1935. Chávez is widely recognized as the most important leader of the farmworker movement and the most important Latino labor leader in US history. The intact buildings and landscape of The Forty Acres remain largely unchanged. Based on the strength of the integrity of location, design, setting, materials, workmanship, and feeling, it holds a direct and nationally significant association with Chávez and the farmworker movement in the United States. NPS/HABS
IMAGE BY JAMES ROSENTHAL, 2012



ASSOCIATION is the direct link between a property and a nationally significant historical event, trend, or person. A historic property retains integrity of association if it is the place where the notable event or activity occurred and is sufficiently intact to make the property recognizable as the place to a present-day user. As with the aspect of feeling, in most cases, an NHL must retain enough of its historic fabric and/or setting to retain integrity of association to a high degree.

Most properties proposed under Criteria 1, 2, 3, and 6 are presumed to convey strong association with those factors that make a property nationally significant. The relative strength of this association with a historical event, trend, or person is one of the factors considered in the nomination's comparative analysis.

ELEPHANT HOTEL, SOMERS, NEW YORK
(DESIGNATED APRIL 5, 2005)

Built and owned by Hachaliah Bailey, the first American to tour exotic animals for public entertainment, the Elephant Hotel is strongly associated with early American circus history. Beginning with an African elephant named Old Bet, Bailey subsequently added other wild animals to his collection and introduced the traveling "menagerie" as an attraction to the United States. The Elephant Hotel became the meeting place and symbolic center of menagerie promoters, and in 1835 the Zoological Institute, a monopoly of menagerie and circus owners, was incorporated at the Elephant Hotel. NPS IMAGE, PHOTOGRAPHER UNKNOWN, N.D.



**SPLIT ROCK LIGHT STATION,
LAKE COUNTY, MINNESOTA**

(DESIGNATED JUNE 23, 2011)

Completion of the Split Rock Light Station in 1910 was a key element of a federally-funded program to update the navigational aids for the Great Lakes. At a time when the Great Lakes emerged as a major component of the nation's industrial economy, this light station served as a vital aid to navigation for commercial freighters traveling the busy and narrow shipping lanes that served the Lake Superior ports of Two Harbors and Duluth-Superior. Tons of iron ore and grain freighters traversed these waters. Built as a single, cohesive, and self-sufficient complex, Split Rock Light Station is an extremely rare example of a Great Lakes light station retaining almost all the facilities associated with a working light station. NPS IMAGE BY JOHN N. VOGEL, OCTOBER 2007

UNDERSTANDING INTEGRITY

The process of evaluating high integrity is not a matter of meeting or failing to meet a one-size-fits-all threshold, and should not be interpreted as, in the language of the federal regulations, establishing “a rigid standard for quality.” Rather, evaluating high integrity should be a dynamic practice whereby its meaning includes consideration of both a property's national significance under one or more of the NHL Criteria and how it compares to other similar properties, as demonstrated through the comparative analysis (see Chapter 8).

A property retaining a sufficiently high degree of overall integrity, necessary for NHL consideration, will possess most if not all seven aspects of integrity. Broadly speaking, having a high degree of integrity means that a property retains nearly all of those features and materials that would have characterized it during its period of significance. It is reasonable to expect that properties recognized for their nationally significant stories would still possess those essential physical features necessary to tell these stories, and to a degree high enough to warrant the special recognition of NHL designation. Nevertheless, the qualitative framework provides some flexibility in how integrity is interpreted for a particular property.

While the evaluation of integrity can be somewhat subjective, it is always grounded in a thorough understanding of a property's remaining physical features and how these relate to its historical associations or meanings. Once a case for a property's significance is developed, it is then possible to focus more clearly on



**CARRIE BLAST FURNACES NUMBER 6
AND 7, ALLEGHENY COUNTY,
PENNSYLVANIA**

(DESIGNATED SEPTEMBER 20, 2006)

As the last vestige of the Homestead Steel Works, once among the nation's most important industrial plants, the Carrie Blast Furnaces Number 6 and 7 NHL offers a full illustration of iron production technology at an integrated steel works during the first half of the twentieth century. Disused since the facility's closure in 1984, the property's condition, while typical of many former industrial sites, has deteriorated and the larger setting has been compromised through losses associated with deindustrialization. These losses have somewhat affected the property's degree of feeling and setting. However, the assemblage of remaining components maintains a high degree of integrity in the areas of location, design, materials, workmanship, and association, because of their continued ability to provide a complete view of an iron production process that once occurred at the steel works. NPS IMAGE BY RON BARAFF AND MICHAEL BENNETT, JUNE 2000



the physical qualities of the resource that contribute to its historic character. This is the point at which a property's physical characteristics and its nationally significant history most clearly intersect. In many cases, direct engagement with the property occurs through on-site fieldwork and writing of the physical description section of the nomination form (Section 6). The description's primary purpose is to ascertain whether the property maintains a high degree of overall integrity and specifically which aspects of integrity are most critical to demonstrating its national significance.

Evaluating the integrity of any resource exists as a logical progression of steps:

- a property's nationally significant context helps identify the essential physical features that must be present for the property to effectively convey this significance;
- on-site fieldwork, which for non-archeological properties may involve one or more inspections of a property and the subsequent writing of the description, establishes whether the essential physical features are present and visible enough to sufficiently communicate a property's national significance;
- knowledge and insight gained through fieldwork, research, and writing the description, considered in conjunction with the property's national significance, permit analysis of the physical property with regard to the seven aspects of integrity;
- the assessment of integrity concludes with a written statement that explains whether, and how, the property retains a high degree of integrity.

Considering the resource against each of the seven aspects of integrity, alone, does not constitute an evaluation of integrity. Rather, the process of discretely analyzing each aspect should contribute to an overall statement about how the property retains a high degree of integrity in relation to its national significance.

Certain aspects of integrity may be more vital to conveying a property's significance than others, and these may be given greater weight in the overall evaluation of integrity. In such situations, it is not enough to merely state a property does or does not maintain high integrity for any of the seven aspects. Rather, the statement of integrity must present careful and persuasive reasoning, grounded in the property's national significance, for why certain aspects of integrity might be more critical than others.

INTEGRITY CASE STUDY: FIELD HOUSE

The integrity evaluation undertaken for the Field House in St. Louis, Missouri (period of significance—1853–57) demonstrates that some aspects of integrity may prove more critical to conveying significance during an analysis of a property's integrity. The property is recognized as nationally significant for its association with Roswell Field, the attorney for Dred Scott, an enslaved man, whose case, *Scott v. Sandford* (1857), is one of the most important in the history of the US Supreme Court. Roswell Field resided in the house while working on the case. As the only extant unit of twelve attached row houses and located less than a block from the interchange of two interstate highways, the property's setting and feeling have subsequently been severely compromised. The nomination's argument for significance—the association with Roswell Field and his work on the Dred Scott case—demonstrated that the property's overall integrity, based on location, materials, design, workmanship, and, especially, association, achieved the overall high degree of integrity necessary for an NHL when designated. In the case of the Field House, the importance of the associated historical event contributed to how the property's integrity was assessed.

Creating a list of comparable properties and assessing them relative to a nominated property also involves consideration of both their relationship to a significant person or activity, as well as an evaluation of their integrity. For the Field House, the number of comparable properties was relatively small. The locations in St. Louis where the federal case was heard, and where Roswell Field's law office was located, were no longer standing. Two other properties associated with the Dred Scott case remain extant in Washington, DC—the Old Supreme Court Chamber and Blair House. However, these properties were not closely associated with the development of Field's legal strategy, which was why the case eventually reached

the nation's highest court. The rarity of remaining properties associated with the Dred Scott case did not eliminate the high integrity requirement, but rather revealed the Field House as having sufficiently high integrity for NHL designation, especially when assessed in light of the rarity of extant properties with a direct connection to this nationally significant event.

**FIELD HOUSE AND NEW MUSEUM/
VISITOR CENTER, ST. LOUIS, MISSOURI**
(DESIGNATED MARCH 29, 2007)

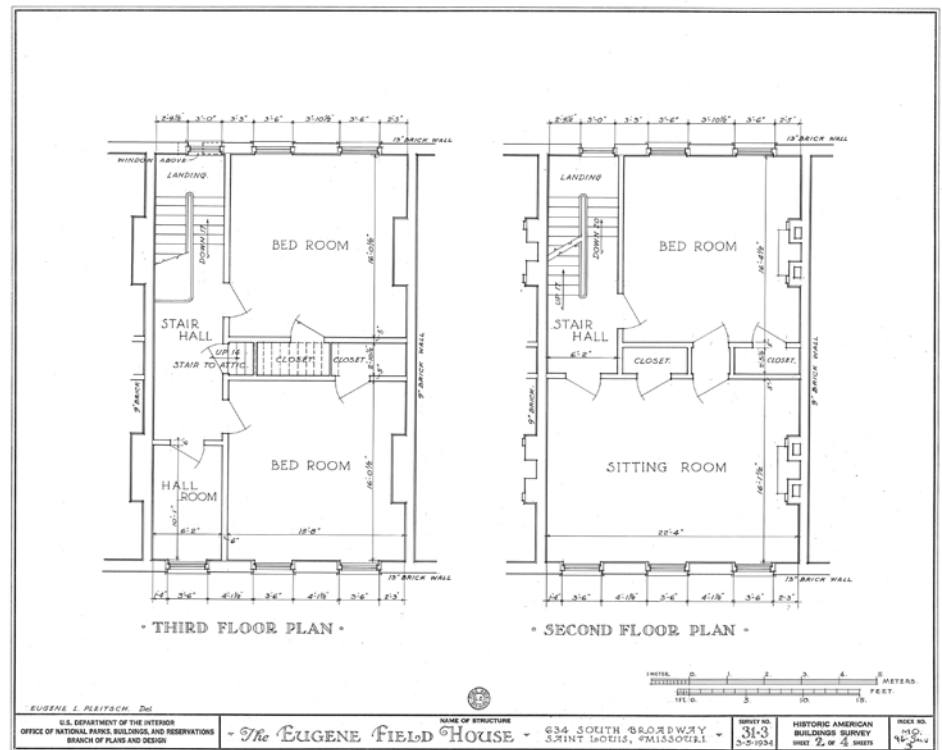
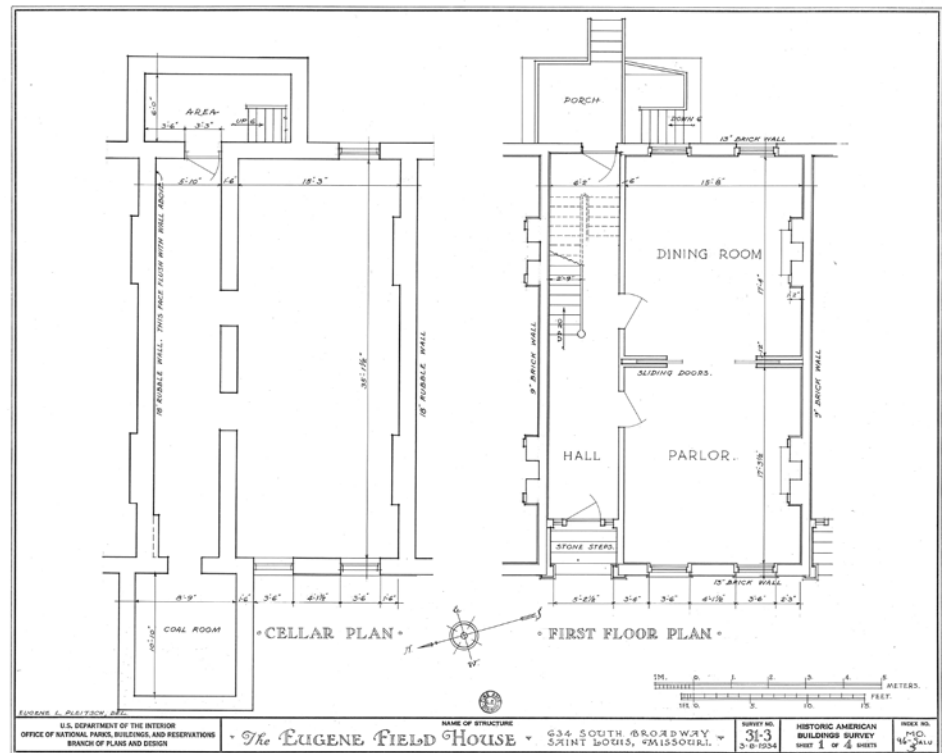
In 1852, while living in this house, attorney Roswell Field took on the case of Dred Scott, who had unsuccessfully sued for his freedom from slavery. Field crafted the legal strategy that took Scott's case to the US Supreme Court as *Scott v. Sandford* (1857). This Court denied Scott his freedom and further ruled that Black people could not be citizens and that Congress could not prohibit slavery in the territories. The Court's controversial decision escalated the political crisis over slavery that led to the Civil War. The importance of the associated historical event contributed to how the property's integrity was assessed. COURTESY OF EUGENE FIELD HOUSE MUSEUM, AUGUST 2017



FIELD HOUSE, ST. LOUIS, MISSOURI

(DESIGNATED MARCH 29, 2007)

Floor plans for the Field House:
Cellar, First Floor, Second Floor,
and Third Floor. NPS/HABS DRAWINGS,
MARCH 1934



**SAMARA
(JOHN E. AND CATHERINE E. CHRISTIAN
HOUSE), WEST LAFAYETTE, INDIANA**

(DESIGNATED FEBRUARY 27, 2015)

Samara (John E. and Catherine E. Christian House) is an outstanding example of a late period (1941–1959) Usonian house designed by Frank Lloyd Wright. As a remarkably complete and mature Usonian design, the home incorporates over forty Wrightian design features that represent the breadth of Wright's impact on modern American architecture and design. The materials, construction, and overall workmanship of the house and its furnishings are of the highest quality and exist today as designed and specified by Wright. Samara is among a select few Wright designs that maintain original finishes, equipment, and furnishings, while meticulously following the architect's original design intentions for the house and its landscape to completion. NPS IMAGE BY CAMILLE B. FIFE, 2011



INFLUENCES ON ASSESSMENT

BUILDING INTERIORS

The example of the Field House also illustrates application of the qualitative framework in other respects. Because the integrity of the Field House's setting was exceptionally low, its interior spaces assumed a heightened role in the evaluation of its overall integrity. The rooms occupied by the Field family at the front of the house maintained a high degree of integrity of design, materials, workmanship, and association. After the house became a museum in 1936 these interior spaces not only survived intact, but were also cared for during a number of restorations. Because most of Roswell Field's national significance derives from his work on the Dred Scott case in his home law office, the high degree of integrity in these interior spaces was deemed sufficient to convey the property's national significance, despite the relative loss of integrity in other areas. The approach to the Field House for NHL designation shows how national significance, integrity, and comparative analysis operate within the qualitative framework.

The Field House further demonstrates the role and relative importance that interior spaces can have for properties associated with nationally significant people or events. In contrast, for some properties, the integrity of interior spaces might matter less because of their inability to convey significance. For example, a commercial skyscraper might be considered important for its steel-framed construction or for its Art Deco exterior and lobbies, while unrelated, changeable office configurations occupy much of its interior. In such a case, the integrity evaluation should provide clear explanation for why lesser levels of integrity are acceptable for the building's interior spaces, relative to the arguments for its national significance. All aspects of a property must be considered when providing an accurate and well-founded integrity assessment. If loss of integrity has occurred among any of the seven aspects—interior, exterior, or surroundings—then the integrity statement must in turn offer persuasive reasoning for why the property still possesses high overall integrity.

MOVABLE CONTENTS

For a building's movable contents, it is important to acknowledge that intact furnishings, artifact collections, etc., have the ability to influence how one perceives integrity; yet explanations of integrity and significance must remain firmly based on the property's fixed elements. For example, following the construction of their Frank Lloyd Wright Usonian house, Samara, in West Lafayette, Indiana (1955–56; NHL, 2015), homeowners John and Catherine Christian notably spent decades completing the entirety of Wright's design, including movable furniture, lamps, and even wastepaper baskets. It would be

**1956 GRAND CANYON TWA-UNITED
AIRLINES AVIATION ACCIDENT SITE,
GRAND CANYON NATIONAL PARK,
COCONINO COUNTY, ARIZONA**

(DESIGNATED APRIL 22, 2014)

The 1956 Grand Canyon TWA-United Airlines Aviation Accident Site is nationally significant for its association with the modernization of the nation's airways. On June 30, 1956, two commercial passenger planes collided in uncongested airspace over the Grand Canyon, killing all 128 people on board both flights. At the time, radar tracking by ground crew was not universal. This watershed event in aviation history dramatically accelerated movements to address an airway crisis created by improved aircraft technology. The aspects of integrity most essential to conveying the remote site's national significance are location, setting, materials, feeling, and association. The integrity of association is established through the two impact areas, the debris fields with their material remains dating to 1956, and the recovery camp sites.

NPS IMAGE, PHOTOGRAPHER UNKNOWN, N.D.



disingenuous to argue that the furniture and other movable objects present in the house cannot convey a sense of its completeness, intactness, and feeling. However, while worthy of inclusion in the property's description and discussion of the family's commitment to stewardship, these features cannot be considered in an evaluation of the property's integrity. If they were removed, Samara would still be able to convey its national significance as a Wright design, despite the lack of furnishings.

A property's movable contents (whether original, period appropriate, reproductions, or objects forming a collection), then, may enhance a property's ability to convey its historic character to visitors. However, the long-term reliability of an NHL designation is dependent on fixing the property's national significance to its immovable features.

CONDITION

A property's condition sometimes influences how integrity is perceived. However, a property's condition is not the same as its integrity, and matters of integrity versus condition should not be confused. For example, a derelict building might be thought to have poor integrity because it is badly in need of paint and sitting amidst overgrown trees and shrubs. Yet, upon closer inspection, the building's poor condition is actually reversible and has little if any impact on its overall integrity. The building's location, design, and association may have strong integrity, and the setting, materials, workmanship, and feeling may still be highly intact, depending on the type and severity of the deterioration. Poor condition should not prejudice a careful assessment of integrity.

INTANGIBLE CULTURAL VALUES

Assessing the integrity of nationally significant properties based on intangible cultural values is accomplished in the same manner as any other property. The qualitative framework provides a means to decide which of the seven aspects of integrity have greater importance in demonstrating that a property retains a high degree of integrity and conveys national significance. For the built environment, all seven aspects should be retained to some degree, and a high integrity must be demonstrated, similar to any other potential NHL. However, for properties where cultural significance is linked to the natural environment, integrity of design and workmanship might be of lesser importance. In all cases, feeling and association will likely be the aspects that have the strongest connection to a property's intangible cul-

tural values, and be of particular value when evaluating the property's integrity. Understanding how a property's intangible cultural values are tied to a particular place is essential to understanding its integrity—as demonstrated by the qualitative framework under one or more of the aspects—and should form the basis of a nomination's assessment of high integrity for the property.

INTEGRITY AND THE NHL CRITERIA

All properties change over time, and it is not necessary for a property to retain all its historic physical features or characteristics to meet the high integrity requirement for designation as an NHL. Rather, a property must retain those essential physical features necessary to convey its historical associations and attributes. Essential physical features are the underlying elements that define both why a property is nationally significant under applicable NHL Criteria and when it was significant (i.e., its period of significance). (See Chapter 5)

PROPERTIES IMPORTANT FOR THEIR ASSOCIATION WITH HISTORIC EVENTS/PATTERNS (NHL CRITERION 1), PERSONS (NHL CRITERION 2), OR AN AMERICAN IDEAL (NHL CRITERION 3)

A property may be considered nationally significant under NHL Criterion 1, 2, or 3 only if it also retains the essential physical features constituting its character or appearance during the period(s) of its association with an important event, historical pattern, person, or ideal. These features typically relate to integrity of location, setting, materials, feeling, and association. Under this scenario, integrity of design and workmanship might be considered less important because they are less able to inform the reasons why the property is nationally significant.

STONEWALL, NEW YORK, NEW YORK (DESIGNATED FEBRUARY 16, 2000)

Stonewall is the event most associated with the dawn of the modern LGBTQ liberation movement. The two buildings of the former Stonewall Inn and the adjacent public space ably convey their historic appearance from the summer of 1969, when a series of uprisings known as “Stonewall,” took place from June 28 to July 3, protesting the frequent raids of gay establishments by police. The uprising and the raid that precipitated it destroyed interior features and finishes, and some exterior building elements, which were subsequently replaced. The property’s interior loss of integrity of design, materials, and workmanship did not significantly affect Stonewall’s overall high degree of integrity because they occurred as part of the nationally significant events in 1969. The intact features of the building’s exterior and larger urban setting, also integral to the nationally significant event, translates to a high degree of integrity of feeling and association to the days that the events unfolded. NPS IMAGE, PHOTOGRAPHER UNKNOWN, N.D.



**ALDO LEOPOLD SHACK AND FARM,
FAIRFIELD AND LEWISTON TOWNSHIPS,
WISCONSIN**

(DESIGNATED JANUARY 16, 2009)

Nationally significant for its association with forester, writer, professor, and conservationist Aldo Leopold, whose work and philosophy shaped modern natural resource conservation, this property has been gently used and appropriately maintained since Leopold's death in 1949. The shack and outhouse largely retain their integrity of materials, workmanship, design, and feeling. Their intact location and setting are both a living manifestation of and inspiration for Leopold's outlook and philosophies. Leopold aimed to restore the played-out farm's natural landscape, and annually between 1936 and 1948 he planted more of the landscape; it is now maintained as a restored and mature woodland, marsh, and prairie. The shack and farm retain a very high degree in each of the seven aspects of integrity. NPS IMAGE BY REBECCA KUMAR, 2005



**SIXTEENTH STREET BAPTIST CHURCH,
BIRMINGHAM, ALABAMA**

(DESIGNATED FEBRUARY 20, 2006)

Sixteenth Street Baptist Church NHL is associated with two events that led to the passage of the Civil Rights Act of 1964. In May 1963, participants in nonviolent marches used this church as a meeting and training place. These marches garnered national and international attention when public officials released dogs and powerful water hoses on the marchers. On September 18, 1963, Ku Klux Klan members bombed the church, killing four young girls, further galvanizing support for the civil rights movement in the United States. The church remains in its original location in a relatively intact urban setting. The building's physical elements, such as its overall exterior architecture and significant interior spaces in the sanctuary and basement, maintain their historic design, materials, and workmanship and retain a strong feeling dating to its period of significance. COURTESY OF CAROL M. HIGHSMITH ARCHIVE, PRINTS AND PHOTOGRAPHS DIVISION, LIBRARY OF CONGRESS, FEBRUARY 2010





**AUBREY WATZEK HOUSE,
PORTLAND, OREGON**

(DESIGNATED JULY 25, 2011)

The Aubrey Watzek House is nationally significant as a superb example of International Style modernism as adapted, disseminated, and popularized through regional interpretations. The house is virtually unchanged from when it was completed for lumber baron Aubrey Watzek and illustrates architect John Yeon's "Northwest Style" focus on the natural environment and wood construction. The property's suburban setting remains essentially the same, but mature trees now block views of Mount Hood, which were a noted characteristic of the house's early history. The exquisite design, immediate setting, materials, and workmanship compensate for this loss, and the house maintains a high degree of integrity of feeling and association.

NPS IMAGE BY JACK LIU, OCTOBER 2008

**PEAR VALLEY,
NORTHAMPTON COUNTY, VIRGINIA**

(DESIGNATED FEBRUARY 27, 2013)

Pear Valley is a rare surviving example of a once common middle-income planter's dwelling built during the first half of the eighteenth century. While varied outbuildings have been lost, the larger agricultural setting remains, and the house's interior spaces still illustrate aspects of daily life in the colonial Chesapeake. The integrity of materials, design, and workmanship of its timber framing documents a once widespread vernacular construction method, giving it national significance under NHL Criterion 4. In addition, the property's retention of a high degree of integrity of location and setting contributes to the feeling and association with eighteenth-century domestic life.

NPS/HABS IMAGE BY JAMES ROSENTHAL, 2011

PROPERTIES SIGNIFICANT FOR THEIR DESIGN (NHL CRITERION 4)

A property may be considered nationally significant under NHL Criterion 4 only if it retains the essential physical features that constitute the particular style, period, type, method, process, or technique it represents. A property that has been altered or lost some physical fabric (e.g., masonry, woodwork, metalwork, etc.) might still possess sufficient integrity to convey its significance, if a majority of its essential physical features remain present. Examples of features that might illustrate an important style, type, method, or technique could include

a property's massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, or ornamentation.

An individual building significant for its architectural style, for example, would likely retain features closely related to integrity of location, design, materials, and workmanship because its significance is indivisible from the physical form and characteristics of the building. The retention of these aspects of integrity to a high degree increases the property's ability to convey the aesthetic or historic sense of a particular time, thus maintaining the aspect of feeling. For a covered bridge significant for its engineering, integrity of location, design, setting, workmanship, and feeling would likely be more relevant than association. For this same bridge, the integrity of materials for the truss and abutments would be more consequential than the materials used for the roof and walls of the cover because the structure's engineered parts are the most crucial for conveying its significance.





ZOAR HISTORIC DISTRICT, ZOAR, OHIO
(DESIGNATED OCTOBER 31, 2016)

The exceptionally well-preserved landscape and nineteenth-century buildings in the Zoar Historic District constitute an entity that embodies and reflects the traditional landscape design, architecture, and way of life inherent in the Society of Separatist's worldview and beliefs. Nationally significant under NHL Criteria 1 and 5, many of the district's buildings reflect European building traditions transplanted by its German American settlers, as well as the German customs, traditions, and religious beliefs of the community. As components of the larger landscape, the resources of the Zoar Historic District maintain high degrees of integrity of location, design, setting, materials, workmanship, feeling, and association. NPS
IMAGE BY STEVEN AVDAKOV, 2012

PROPERTIES SIGNIFICANT AS DISTRICTS (NHL CRITERION 5)

Evaluation of a district's integrity under Criterion 5 should focus on the integrity of the district as a whole. Because of their relatively large scale, districts often exist as full-fledged environments that are particularly effective in conveying the sense of a specific time and place. The integrity of location, design, setting, materials, association, and, especially, feeling, often play a large role in conveying these characteristics under NHL Criterion 5—more so than, for example, the aspect of workmanship. Feeling, in particular, is essential to a district's overall degree of integrity, as it contributes directly to the sense of time and place. For this reason, establishing a district's boundaries is an important activity as it pertains to integrity. The inclusion of contributing versus noncontributing resources in a district boundary has the potential to directly affect whether high integrity is achieved.

The resources within a district establish its historic character and must still possess a high degree of integrity, even if they are individually undistinguished in terms of significance. However, their degree of integrity should correspond to their contribution to the district's national significance. The spatial and visual relationships between these resources are often of primary importance and must remain substantially unchanged since the period of significance. The degree of integrity needed for individual features depends on their specific circumstances and how they relate to the district's overarching nationally significant story.

Nominations should consider the relative number, size, scale, design, and location of features that do not contribute to a district's significance (i.e. noncontributing resources), when evaluating the impact of intrusions on a district's integrity. A district typically does not meet the high integrity requirement if the number of alterations and/or new intrusions is so great that its national significance cannot be sufficiently conveyed. This happens when the number and scale of noncontributing resources obscure the contributing resources in a proposed NHL district.

PROPERTIES SIGNIFICANT FOR THEIR ARCHEOLOGY (NHL CRITERION 6)

For properties considered under Criterion 6, integrity relates to the property's ability to provide sufficiently intact deposits or sources of data that have already yielded, or may be expected to yield, information significant to a historic context or theme. For archeological resources, the seven aspects of integrity are often immaterial to an archeological property's ability to convey its national significance. Although possible, correlating the seven aspects of integrity with standard site characteristics is often difficult because archeological resources are typically buried and cannot be easily seen. Instead, distinct to archeological properties, integrity evaluations should be based first on the "professionally demonstrated intactness" of a property's deposits and features, to the extent that they can address nationally significant research questions. In addition to or in lieu of archeological excavation, prior documentation (e.g., reports, studies, and references to previous excavations), remote sensing, collections, and the observations of scholars may be used to support an assessment of archeological integrity when no remains are visible aboveground. As with other NHL Criteria, high integrity exists when the level of preservation and/or quality of information is closely associated with and amply demonstrates the property's national significance.

Buried archeological deposits are subject to a host of cultural and natural post-depositional processes that may affect a site's subsurface integrity. For instance, sites plowed for agricultural purposes may retain sufficient integrity if it is demonstrated that the plowing disturbance has not irrevocably destroyed or compromised the ability to recover, analyze, and interpret the important information that the site holds. In fact, an archeological site or district may be considered nationally significant precisely because it presents (or has presented) an opportunity to study, measure, and learn about site formation, taphonomic

LYNCH KNIFE RIVER FLINT QUARRY, DUNN COUNTY, NORTH DAKOTA

(DESIGNATED JULY 13, 2011)

The Lynch Knife River Flint Quarry's vast collection of precontact quarry pits arrayed across the landscape are the visible signatures that the site has yielded and may still be likely to yield information about a vital source of stone materials necessary for the creation of indigenous tools that were used for daily activities and fostering trade between Native American groups. In comparison to other similar sites, it represents the largest and most complete quarry of Knife River flint with an intact archeological record of precontact quarrying efforts, spanning the last 13,000 years. Because of its intactness and ability to answer nationally significant research questions, the site is considered to have the highest integrity of all comparable sites and to be nationally significant under NHL Criterion 6. NPS IMAGE BY TERRY WIKLUND, SEPTEMBER 2004



**LUDLOW TENT COLONY SITE,
LAS ANIMAS COUNTY, COLORADO**

(DESIGNATED JANUARY 16, 2009)

Possessing national significance under NHL Criterion 1, the Ludlow Tent Colony Site is the location of the Ludlow Massacre in 1914. A protracted standoff between striking miners and the Colorado National Guard culminated in the destruction of the tent colony from an intentionally set fire, causing the deaths of two women and eleven children in an underground cellar. As the first such strike camp to be archeologically investigated, the Ludlow Tent Colony Site is also nationally significant under Criterion 6 for its potential to answer specific questions about ethnicity, class interaction, living conditions and the archeology of labor. Archeological investigation of the site to date is providing a richer, more detailed, and more systematic understanding of the everyday reality of mining families of the period and throughout the United States. IMAGE COURTESY OF COLORADO COALFIELD WAR ARCHEOLOGICAL PROJECT, 1998



processes, or other topics important in archeological science and social science. Archeological resources may contain a great deal of important information and yet have experienced some form of disturbance, including past excavation. In such instances, site integrity is a measure of what has already been learned from the site and the national significance of that discovery, model, theory, or application of a new methodology, combined with the likelihood that substantial intact cultural deposits remain undisturbed.

An archeological site's integrity is assessed through application of systematic and professionally conducted field methods and research such as site documentation from previous excavations or surveys. Together, excavation, collections, site reports, and scholarly context are essential components of a multifaceted argument for nationally significant archeological integrity. The increasing sophistication and accuracy of remote sensing technologies are also valuable tools in assessing archeological site integrity. These methods may be used to help measure a site's integrity, without the need for extensive excavation.

The integrity of archeological resources is also important when considering other NHL Criteria. For instance, a study of archeological resources contributed to the Criterion 1 argument for the Balls Bluff Battlefield Historic District (period of significance—October 20–24, 1861; NHL, 1984; updated documentation and boundary change, 2016), the site of an early and key Civil War battle whose outcome established the Joint Committee on the Conduct of the War. Subsurface features identified through remote sensing and limited excavation helped inform the district's integrity of location, association, and setting. The location of features such as roads and former buildings were only identifiable through archeology. The archeological information provided important context for recreating the battle narrative, even though the archeological resources themselves were not capable of answering nationally significant research questions under NHL Criterion 6.

CHAPTER 7

WITHDRAWAL OF DESIGNATION

GRANT PARK STADIUM, CHICAGO, ILLINOIS

(DESIGNATED FEBRUARY 27, 1987;
WITHDRAWAL OF DESIGNATION FEBRUARY
17, 2006)

Grant Park Stadium was designated an NHL as an outstanding example of early twentieth-century stadium design. Completed in 1924, the Classical Revival stadium occupied a lakefront site identified in Daniel Burnham and Edward Bennett's 1909 plan of Chicago and functioned as a memorial to World War I soldiers. The Doric colonnades on its east and west sides were the design's most distinctive features. A 2003 remodeling and expansion destroyed historic features and spaces throughout the stadium and introduced a new seating bowl that rises above and, on one side, over the colonnades. The NHL designation was withdrawn three years later because the incompatible construction and the destruction of substantial historic material resulted in an unacceptable loss of integrity.

LEFT IMAGE: NPS IMAGE BY HARRY WEESE & ASSOCIATES, 1982. RIGHT IMAGE: NPS IMAGE BY NPS MIDWEST REGIONAL OFFICE, 2004

The designation of a property as an NHL means that it is recognized as being nationally significant and “possessing exceptional value or quality in illustrating and interpreting the heritage of the United States.” This recognition does not, however, prevent changes being made to the property that could completely alter its character. When a designated property is altered so severely that it loses its ability to convey its national significance, the withdrawal of its NHL designation may be considered. This action occurs at the request of the owner or on the initiative of the Secretary of the Interior or the Secretary's delegated authority. Often, efforts to withdraw an NHL designation originate from National Park Service (NPS) regional offices, as part of the Secretary's delegation of authority and awareness of a change in status for an NHL.

There are four justifications for the withdrawal of an NHL designation:

- the property has ceased to meet the criteria for designation because the qualities for which it was originally designated have been lost or destroyed;
- additional information gathered after the designation demonstrates conclusively that the property does not possess sufficient significance to be an NHL;
- a professional error was made in the NHL designation process; and/or
- a prejudicial procedural error occurred in the designation process.

Designations made prior to December 13, 1980, can only be withdrawn because of a loss of those qualities which caused the property to be originally designated, as identified in the first point cited above. Loss of integrity through alteration, addition, or destruction is the most common reason for the withdrawal of NHL designation. For archeological properties, if the level of change means that it no longer has the potential to yield nationally significant information then the property's designation may be withdrawn.

If a property warrants consideration of withdrawal of its NHL designation, the NHL Program first prepares a report explaining the reasons for such action. The



USS CABOT, BROWNSVILLE, TEXAS

(DESIGNATED JUNE 21, 1990; WITHDRAWAL OF DESIGNATION AUGUST 1, 2001)

The USS Cabot was designated an NHL as the last remaining World War II-era Independence-class light aircraft carrier, a class of vessel vital to Allied success in the Pacific theater in 1944–1945. Slated for restoration and use as a museum, the funding never materialized, and the ship was auctioned to settle debts and subsequently scrapped in 2000. Its NHL designation was withdrawn the following year because the ship had lost its integrity and, as a result, the ability to convey its national significance. NPS IMAGES, PHOTOGRAPHER UNKNOWN, N.D.



report must specify and date the physical changes to the NHL that resulted in the loss of its nationally significant qualities, or otherwise explain how the property no longer meets the criteria for NHL designation. For properties that have lost integrity, photographic documentation is necessary to record such losses. The withdrawal of a property's NHL designation follows the same notification procedures and review process as those for NHL designation. There have been thirty-six instances of NHL designation withdrawal as of May 2023.

Although its NHL designation may be withdrawn, a property might remain listed in the National Register of Historic Places, if the Keeper of the National

Register determines that it still meets the National Register criteria for evaluation identified in 36 CFR Part 60.4. If a National Register registration form does not already exist for the NHL property, such documentation would need to be prepared in order for it to remain in the National Register.

KATE CHOPIN HOUSE, CLOUTIERVILLE, LOUISIANA

(DESIGNATED APRIL 19, 1993; WITHDRAWAL OF DESIGNATION DECEMBER 23, 2016)

A nationally significant novelist and short story writer, Katherine O'Flaherty Chopin lived in this Louisiana raised cottage from 1880 to 1883. Chopin utilized the folk culture of the Louisiana bayou country around Cloutierville as background for many of her works. The Kate Chopin House was serving as the Bayou Folk Museum when an early morning fire on October 1, 2008, destroyed the house. The building burned to the ground and the chimney, the only part that survived the fire, was later bulldozed. As the property no longer retains its historic integrity due to its total destruction, the property's NHL designation was withdrawn in 2016. TOP IMAGE: NPS IMAGE BY AMANDA CHENAULT, 1992. BOTTOM IMAGE: NPS IMAGE BY NATIONAL CENTER FOR PRESERVATION TECHNOLOGY AND TRAINING, 2008



CHAPTER 8

COMPARATIVE ANALYSIS

Comparing a nominated property with similar properties that share related historic significance is fundamental to determining whether a property has exceptional value in illustrating, interpreting, or commemorating the history of the United States. A required element of all NHL nominations, the comparative analysis considers a property's nationally significant history, as well as its historic integrity. It takes into account how similar properties relate to shared history and how closely they are associated with important events, patterns, and/or persons. The comparative analysis also assesses properties' levels of integrity as a basis for comparison. These processes are part of the qualitative framework used to determine the national significance of a nominated property.

This chapter addresses how to thoughtfully develop a thorough comparative analysis. It also examines how the comparative analysis relates to other parts of the qualitative framework, in particular how it can help demonstrate that a property maintains a high degree of integrity.

The NHL Program's approach to preparing the comparative analysis based on a national perspective is one element that distinguishes it from similar components of most National Register documentation. At minimum, National Register nominations must demonstrate national significance by providing evidence that a property played an important role within a nationally significant area of history. Doing so frequently involves the presentation of a thoroughly researched historic context, but does not necessarily require a full understanding of the entire universe of other similar properties that may exist within a historic context. In contrast, an NHL nomination's comparative analysis is expected to include a complete, thoroughly researched analysis of all known similar properties within a particular historic context, and document the relative national significance of a nominated NHL in comparison to these other properties.

MCGREGOR MEMORIAL CONFERENCE CENTER, DETROIT, MICHIGAN

(DESIGNATED FEBRUARY 27, 2015)

The McGregor Memorial Conference Center was a benchmark work in the career of the nationally significant, Japanese American architect Minoru Yamasaki. One of the twentieth century's most important Modern architects, the building represents a key turning point in Yamasaki's career as he shifted away from International Style orthodoxy to his own distinct vision. The nomination's focus was Yamasaki's career and artistic evolution, and the comparative analysis for McGregor Memorial Conference Center was limited to his works. Perhaps best known as the architect for New York's World Trade Center (no longer extant after the terrorist attack on September 11, 2001), Yamasaki's McGregor Memorial Conference Center was the first fully realized design of his mature work. It remains the clearest example of his design principles, which fused traditional forms with modern materials and construction methods. NPS
IMAGE BY RUTH E. MILLS, JUNE 2013



IDENTIFICATION OF COMPARABLE PROPERTIES

The universe of comparable properties used to ascertain an NHL's national significance should include all other properties that are in some way associated with the history presented in a nomination. In some cases, a subset of comparative prop-



PAULI MURRAY FAMILY HOME, DURHAM, NORTH CAROLINA

(DESIGNATED DECEMBER 23, 2016)

The Pauli Murray Family Home is associated with ground-breaking civil rights activist, lawyer, educator, writer, and Episcopal priest Pauli Murray. Their education, work, and career resulted in frequent relocations to different cities, where they occupied rented apartments. The comparative analysis considered some of these apartments and offices, but all were excluded as likely candidates for NHL designation because of low levels of integrity or the lack of association with Murray's nationally significant activities. The analysis concluded that the Murray family's Durham home is the only extant building that is importantly and closely associated with Pauli Murray's life and prolific career. The comparative analysis also explored the home relative to the designated houses of other civil rights activists. NPS IMAGE BY HEATHER FEARNBACH, AUGUST 2016

erties may suffice, if reasonably justified. Regardless, the comparative analysis should demonstrate that the nomination preparer has made a documentable, good faith effort at identifying other existing resources that might also convey the same nationally significant history. Depending on the national significance argument, comparable properties might be limited to a relatively small geographic area or may take in extant resources throughout the country. The total number of comparable properties is variable and rooted in the resource itself—its history, area(s) of significance, level of integrity, and rarity. Nomination preparers should communicate with NHL Program staff, particularly in the regional offices, as well as SHPOs, to determine what properties should be included in the comparative analysis. Properties discussed in the comparative analysis may

already be listed and/or designated at the local, state, or national level, and may include resources that are not so recognized and/or not yet identified.

In a nomination, an effective comparative analysis should include an introduction that discusses the method devised to identify comparable properties, followed by a detailed presentation of the analysis and its findings. The parameters for identifying comparable properties should be meaningful, but not so superficially limiting that the only logical comparable is the property under consideration. Some properties may have large numbers of potential comparables and others will have a much smaller universe. For example, properties related to the nationally significant work of a scientist might be limited to a laboratory, an office, a university building, and a residence, all located in the same city. In contrast, comparable properties for a significant work of Brutalist architecture would likely include buildings throughout the nation. There might also be circumstances where there are no functional comparables. In each case, a nomination should document why the particular selection was made and provide a logical point of comparison.

The comparative analysis should not be a descriptive list. Each identified comparable property should be meaningfully analyzed by applying the same approach used to consider the national significance of the nominated property. Some comparable properties may not have a strong historical association, yet maintain a high degree of integrity. Others may be closely related to the same history as the nominated property, but not be able to adequately convey national significance because of changes over time. The purpose of the comparative analysis is to demonstrate that the nominated property is among the best in illustrating or interpreting a nationally significant area of history. It is intended to be a qualitative assessment, not a harsh rank ordering where all comparative properties are negatively presented against the merits of the nominated property. Comparative analysis is presented as part of Section 5 (Significance Statement and Discussion) of the nomination form. While it may be integrated into the larger discussion of the property's national significance, the comparative analysis usually appears under its own heading toward the end of the section.

COMPARATIVE ANALYSIS EXAMPLES

FIRST PEOPLES BUFFALO JUMP in Cascade County, Montana is one of the oldest, largest, and best preserved bison mass-procurement cliff jump localities in North America. The monumental record of stone surface architecture, deeply stratified bison bone deposits, multiple tipi ring concentrations, and extensive evidence of ceremonialism indicate that, for approximately 5,700 years, First Peoples Buffalo Jump held a paramount position in the Northern Plains “bison culture.” As an archeological resource, the site holds potential to inform the evolving sophistication of mass-procurement strategies of hunter-gatherer societies in the Northern Plains in particular, and to provide meaningful insights into the cultural development of precontact hunter-gatherer societies in the western United States.

Through a comparative analysis, the nomination substantiated the property’s significance in relation to other bison mass-procurement sites. Even though thousands of bison kill sites exist in the Northern Plains region of the United States and Canada, few remain with good integrity. The only other extant site that approximates First Peoples Buffalo Jump’s antiquity, integrity, quality of contributing elements, and size is not located in the United States; Head-Smashed-In Buffalo Jump, a UNESCO World Heritage Site, is located in southern Alberta, Canada. First Peoples Buffalo Jump is unsurpassed when compared with the hundreds of other bison mass-procurement sites found within the United States. It offers the best opportunity to obtain data about such sites at just one location, as there are no known comparisons to its deeply stratified, intact cultural deposits.

**FIRST PEOPLES BUFFALO JUMP,
CASCADE COUNTY, MONTANA**

(DESIGNATED JULY 21, 2015)

COURTESY OF MONTANA FISH,
WILDLIFE & PARKS, N.D.



**DAVIS-FERRIS ORGAN,
VILLAGE OF ROUND LAKE, NEW YORK**

(DESIGNATED DECEMBER 23, 2016)

NPS/HABS IMAGE BY RENEE BIERETZ,
OCTOBER 2010



THE DAVIS-FERRIS ORGAN was built in 1846–1847 for a New York City Episcopal church and relocated to the Round Lake Camp Meeting in upstate New York in 1888. It is a monument to the technical and mechanical achievements of the antebellum organ-building industry. It is also a record of American sacred and secular music-making of the mid-nineteenth century. The organ, a nationally significant object, is installed in the Round Lake Auditorium, which provides its setting. The nomination's comparative analysis was necessarily limited because it identified the Davis-Ferris Organ as the only remaining example of its type to survive in near-original condition. Most contemporary organs were either lost or drastically retrofitted as new technologies became available and/or tastes in music changed. None remain today that are the same organ type. More broadly, it is one of only a handful of antebellum and mid-nineteenth century organs to remain extant and close to their original states when constructed.

THE ST. CHARLES LINE, the oldest operational street railway in the United States, is nationally significant as a representation of street railway systems and the urban growth patterns they engendered in the late-nineteenth and twentieth centuries, and for its thirty-five Perley A. Thomas streetcars, which have operated since 1923-24. The nomination's comparative analysis considered numerous factors related to the significance of street railway systems, including: their survival/rarity, their adaptation to new modes of mass transit, retention of their routes, and the use of historic cars. The results of this analysis bolstered the nomination's case for national significance.

The comparative analysis found that, although other historic railway lines exist in the United States, very few retain their conventional streetcars, as most were converted to other types of mass transit systems. Some original rail cars and routes for certain systems exist or continue to operate within a museum or tourism setting, yet these lines do not share the St. Charles Line's combined historic integrity and contextual depth. Similarly, some North American cities retain their nineteenth-century streetcar routes, including those in Boston, Philadelphia, and Pittsburgh, but none still possess their original streetcars. Other systems have individual resources recognized for their historic significance—such as trolley cars, car barns, or other support structures—but they exist in isolation and generally without a strong association to a larger system or route.

The nomination compared the St. Charles Line in detail with two NHL-designated public transportation systems: the Tremont Street Subway in Boston, Massachusetts (NHL, 1964), and the San Francisco Cable Cars, in San Francisco, California (NHL, 1964). Both of these systems possess national significance and a high degree of integrity approaching that of the St. Charles Line. However, the comparative analysis found that the three systems each offer distinct contributions to the nationally significant story of American urban transit.

**THE ST. CHARLES LINE,
NEW ORLEANS, LOUISIANA**
(DESIGNATED AUGUST 25, 2014)

NPS IMAGE BY CARIDAD DE LA VEGA,
NOVEMBER 2018



**ADLAI E. STEVENSON II FARM,
LAKE COUNTY, ILLINOIS**

(DESIGNATED APRIL 22, 2014)

NPS IMAGE BY ROBIE S. LANGE,
SEPTEMBER 2012



THE ADLAI E. STEVENSON II FARM in Lake County, Illinois, is nationally significant for its association with Adlai Stevenson and his role in mid-twentieth century diplomatic and political history. As the titular head of the Democratic Party, Stevenson led the party's transition from a focus on the New Deal to a new and different concentration associated with the emergence of a younger generation in the 1960s. Stevenson also served in the United Nations in several important positions that influenced its establishment, organization, and early operation, and later served as its American ambassador during the most dangerous conflict in Cold War history, the 1962 Cuban Missile Crisis.

The nomination's comparative analysis discussed a number of places directly associated with Stevenson. The farm was Stevenson's permanent home for much of his adult life and is closely associated with many of his important activities. Comparable properties included his childhood home in Bloomington, Illinois. It had passed to his sister and he maintained a long association with it, but it was not as deeply and importantly associated with his participation in nationally significant events. During the remainder of Stevenson's life, his work with the United States government, with the United Nations, as governor of Illinois, and as a private attorney meant he was frequently traveling and relocating. He spent periods in Washington, DC, New York, London, and Springfield, Illinois, living and working in various offices, hotels, rented apartments and houses, and official residences. In most of these places, Stevenson's activities did not rise to the level of national significance or did not have the same sustained association with his significant activities as did the Illinois farm.

It could probably be demonstrated that some places where Stevenson lived and worked in London during the earliest history of the United Nations, or at the United Nations Complex in Manhattan, were relevant to his national significance. However, in both cases the locations—one outside the United States and the other having special territorial status within the country—are legally problematic for NHL designation. The nomination also found that his ambassadorial apartment in the Waldorf-Astoria Hotel—where he lived while ambassador to the United Nations—may warrant NHL consideration for his association with global politics of the 1960s, but that it does not compare to his Illinois home's stronger association with the full span of his career.

CHAPTER 9

THE NOMINATION

The nomination must address these three interrelated parts of the qualitative framework:

NATIONAL SIGNIFICANCE

(see Chapter 4)

HIGH DEGREE OF INTEGRITY

(see Chapter 6)

COMPARATIVE ANALYSIS

(see Chapter 8)

The nomination package must include these elements:

Completed draft nomination form

Locational and boundary maps

Photographs of the property, both historic and current

Floor plans, site plans, and/or other figures including copyright free historic images

The purpose of an NHL nomination is to document buildings, structures, objects, sites, and/or districts as nationally significant under the NHL Criteria. To be considered for NHL designation, a nomination must address the three interrelated parts of the qualitative framework, as introduced in Chapter 1: national significance, high degree of integrity, and comparative analysis.

The term “nomination” usually refers to the NHL nomination form—the focus of the NHL process. However, preparing a nomination also involves the production of an entire nomination package. This package includes four major elements: a completed nomination form with correctly formatted footnotes and a bibliography; a location map that clearly delineates the proposed NHL boundary; current, high-resolution photographs that adequately portray the resource; and illustrative maps, floor plans, site plans, and/or other figures and images.

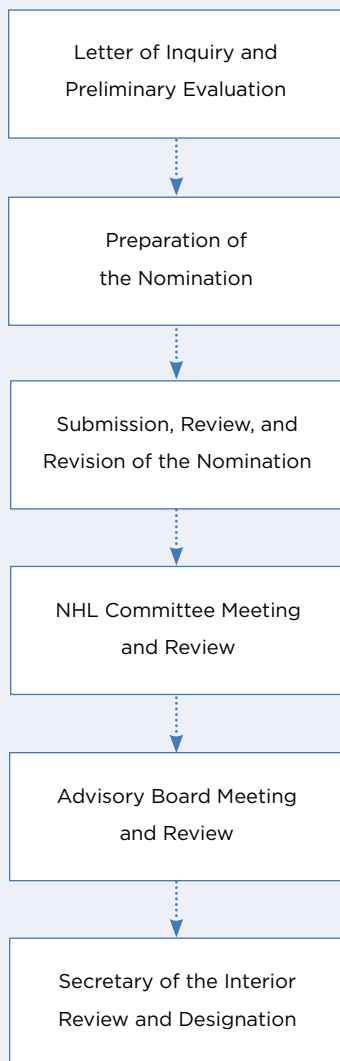
The nomination form is the written documentation containing all of the identifying and physical information about a property, the argument for its national significance, the discussion of the comparative analysis, and scholarly sources of information used to craft the argument for its national significance. Other parts of the nomination package comprise various types of graphic documentation that locate the property and contribute to an understanding of how the property meets the three conditions for ascribing national significance. When preparing for an NHL Committee meeting, the nomination preparer will also be asked to submit an executive summary of the nomination and a PowerPoint presentation, both using standard templates provided by NHL Program staff.

THE NHL NOMINATION FORM

Nomination preparers are required to use the NHL nomination form (NPS Form 10-934) to nominate properties for NHL designation. NHL Program staff provides the electronic template of the form to preparers when they are invited to initiate a nomination in response to a letter of inquiry. Nomination preparers should contact the NHL Program staff assigned to a property before completing the form. The staff member will elaborate on the NHL process, help clarify information contained in the letter of inquiry response, and be available to answer questions about the nomination as they arise during its preparation.

At the beginning of the NHL process, the nomination preparer should provide contact information necessary for legal notifications. The names and email (preferred) or mailing addresses for the following must be provided:

- the owner(s) of the property;
- the highest elected local official of the jurisdiction in which the property is located, such as a mayor or the chairman of a county board or commission;
- the State Historic Preservation Officer (SHPO) for the state(s) in which the property is located; if the property is located on tribal land, the Tribal Historic Preservation Officer (THPO) for that tribe(s) (if there is one); and if the



property is owned by a federal agency, the agency's Federal Preservation Officer (FPO) or their designee;

- the two US senators for the state(s) in which the property is located; and
- the US representative(s) for the district(s) in which the property is located.

The nomination form template is a Microsoft Word document. The form and all additional electronic files submitted as part of the nomination should also be generated in Microsoft Word. In addition, all completed NHL nominations must comply with Section 508 of the Rehabilitation Act of 1973, as amended in 1998 (29 U.S.C. §794 (d)), which addresses accessibility standards for electronic documents (for more information, see www.section508.gov). The NHL nomination template and other forms are provided in a Section 508 compliant format; however, compliance should be maintained as the form is modified. Please contact NHL Program staff for more specific guidance regarding Section 508 compliance and some of the more common issues encountered in the nomination form.

The latest edition of the *Chicago Manual of Style* must be used to format all citations, bibliographical references, and aspects of style within the form. Nominations for properties having archeological significance under Criterion 6, whether solely or in conjunction with another of the NHL Criteria, may use the Society for American Archaeology's style guide for citations and bibliographical references.

For updated NHL documentation, an entirely new form must be prepared that is based on the original nomination with the addition of the new information. Unlike providing additional documentation to the National Register of Historic Places, updated NHL nominations replace the original documentation. Updated documentation typically enlarges what is known about an NHL's history, considers other areas of national significance, utilizes additional NHL Criteria, or proposes changes to an established NHL boundary. There is no requirement to update a property's existing NHL documentation, even when new information, viewpoints, or methods of analysis are known to exist. NHL designations stand on the documentation and review process at the time of a property's original nomination and designation (see Chapter 4).

The nomination form includes eight numbered sections:

1. Name and Location of Property
2. Significance Data
3. Withholding Sensitive Information
4. Geographical Data
5. Significance Statement and Discussion
6. Property Description and Statement of Integrity
7. Bibliographical References and Other Documentation
8. Form Prepared By

The following guidance is arranged in sequential order and by reference to the corresponding section headings and subheadings of the nomination form.

**ATHENAEUM (DAS DEUTSCHE HAUS),
INDIANAPOLIS, INDIANA**

(DESIGNATED OCTOBER 31, 2016)

The Athenaeum (Das Deutsche Haus) in Indianapolis, Indiana is nationally significant as the home of the Normal College of the North American Gymnastic Union, the nation's oldest, continuously active school of physical education. The school was established by the Socialer Turnverein, a German American gymnastic and social club. When originally completed in 1893, their headquarters was called "Das Deutsche Haus," but was renamed the "Athenaeum" in 1918 because of anti-German sentiment during World War I. Because both names were in use during the period of significance and the original German name reflects the organization's history, the NHL was designated under both. NPS IMAGE BY ALAN CONANT, SEPTEMBER 2010

SECTION 1 NAME AND LOCATION OF PROPERTY

HISTORIC NAME

A property's historic name should reflect its national significance. In most instances, the name selected should be what was historically or traditionally used to refer to the property during the period of significance. This is the name under which the property will be designated. It may also be colloquially known by a non-historic name(s), or possess other naming conventions. These names are noted in the form's "Other name/Site Number" field (see below). If no historic or traditional name exists, then a name that best refers to the property's national significance should be selected. Some examples of historic names of NHLs follow.

THE MEDGAR AND MYRLIE EVERS HOUSE, Jackson, Mississippi (NHL, 2016), is nationally significant for the roles that Medgar and Myrlie Evers both played in the National Association for the Advancement of Colored People (NAACP) and, more broadly, the civil rights movement. The house was their residence, the location of civil rights activities, and the place where Medgar was assassinated in 1963.

MAN MOUND in Greenfield, Wisconsin (NHL, 2016) is nationally significant as the only surviving earthen anthropomorphic mound in North America and as a particularly fine example of Late Woodland bas-relief earth effigy mound construction. The name used is the one associated with the site since its "discovery" by American surveyor William Canfield in 1859. The Ho-Chunk Nation, which holds the closest ties to the site, was consulted during the NHL process and did not object to the English name.



THE ALINE BARNSDALL COMPLEX in Los Angeles, California (NHL, 2007) is nationally significant as part of Frank Lloyd Wright's important first commission in Los Angeles, which embodies his transition away from the dwellings of his "First Mature" or "Oak Park" period. The project's centerpiece was oil heiress Aline Barnsdall's sprawling hilltop Hollywood residence, commonly known as Hollyhock House. The patron and architect envisioned a much more extensive development of the site, but only a handful of the additional buildings and structures were realized. The name alludes to the larger grouping of historic resources that includes Hollyhock House, as well as Aline Barnsdall's broader ambitions for developing the site.

THE AKIMA PINŠIWA AWIIKI (CHIEF JEAN-BAPTISTE DE RICHARDVILLE HOUSE) in Fort Wayne, Indiana (NHL, 2012) is nationally significant as a rare and exceptionally well-preserved example of an extant treaty house constructed as the direct result of the treaty-making between American Indians and the US government. The name includes the name of the akima (civil chief) Pinšywa utilized by Myaamia (Miami) speakers, followed in parenthesis by the name for which he was known by most Europeans. The federally recognized Miami Nation (Oklahoma) and the non-federally recognized Miami Tribe of Indiana were consulted during the NHL process. Throughout the project, NHL Program staff and the contractor writing the nomination worked with the tribes to work out the name and other aspects of language use and, more broadly, to give a Miami voice to the history and outlook presented in the nomination.

If a property's historic name is the same as a known institution, business, organization, or other entity, then the name should be appended with an appropriate term that denotes the "place" being referred to. Doing so helps differentiate between the nominated property and the institution or organization, which may also refer to other properties or reflect a larger cultural or historical sphere. For example, the former headquarters of the United Mine Workers of America in Washington, DC, was designated an NHL in 2005 as the "United Mine Workers of America Building."

OTHER NAME/SITE NUMBER

Enter any other important names by which the property has been commonly known. These names may reflect the property's history, current ownership, or popular use, and may or may not reflect its historic name. Smithsonian trinomials (or state- or agency-issued site numbers), often assigned to archeological sites for identification and management purposes, should be placed in this location on the form.

STREET AND NUMBER, CITY/TOWN, COUNTY, AND STATE

Enter the official street address for the property, if it has one, or the most specific location if no street number exists; then enter the city/town, county or equivalent local jurisdiction, and the state or territory. For districts enter the range of streets as possible. If a property is located outside of a town boundary, or if the nomination contains sensitive information that should be withheld from public disclosure (see Section 3 of the form), enter the nearest city or town followed by "vicinity."

SECTION 2 SIGNIFICANCE DATA

NHL CRITERIA AND NHL CRITERIA EXCEPTIONS

Enter the applicable NHL Criteria and NHL Criteria Exceptions under which the property is being nominated (see Chapter 5).

NHL THEMES

List the NHL theme(s) and subtheme(s) found in the National Park Service's Thematic Framework (1996) for each NHL Criterion listed above. Nomination preparers may enter more than one nationally significant theme or subtheme, but each must be supported by the Significance Statement and Discussion presented in Section 5 of the form. The theme(s) must relate to the property's national significance as associated with the history, architecture, archeology, engineering, and/or culture of the United States. NHL Program staff will assist with identification of the appropriate theme and subtheme.

PERIOD(S) OF SIGNIFICANCE

Enter the period(s) of significance during which the property was importantly associated with nationally significant events, activities, and persons, or attained the nationally significant characteristics that qualify it for designation as an NHL. See Chapter 4 for an explanation of the period of significance and further guidance on its definition.

SIGNIFICANT PERSON(S)

Complete this item only if the property warrants consideration under NHL Criterion 2. Enter the full name, last name first, of the nationally significant person associated with the property. Enter the names of several individuals only if each person is documented in Section 5: Significance Statement and Discussion as nationally significant and made nationally significant contributions for which the property is being designated.

CULTURAL AFFILIATION

Complete this item only if the property is being considered under NHL Criterion 6. Cultural affiliation is generally a name or term applied to a specific cultural group that is directly associated with a property or resource.

DESIGNER/CREATOR/ARCHITECT/BUILDER

List the full name, last name first, of any known person(s) importantly involved with the design and/or construction of the property.

HISTORIC CONTEXT

The historic context provides a quick reference about why a property is nationally significant. If the property is associated with a theme or context study, enter its name here and/or the relevant areas of significance as identified by the NPS. Nomination preparers may enter more than one nationally significant theme or historic context, but they must be supported by the Significance Statement and Discussion in Section 5. NHL Program staff will assist in the identification of relevant historic context(s) to be entered in this section.



**CASA DRA. CONCHA MELÉNDEZ
RAMÍREZ, SAN JUAN, PUERTO RICO**

(DESIGNATED FEBRUARY 27, 2013)

For over four decades, this building was the residence and workspace of Dra. Concha Meléndez Ramírez. She is nationally significant as a prolific literary critic and a prominent voice in Puerto Rican literary criticism. She was part of the Generación del Treinta (Generation of 1930), a literary movement that shaped Puerto Rico's twentieth-century national cultural identity. NPS IMAGE BY LISA DAVIDSON, FEBRUARY 2023

SECTION 3 WITHHOLDING SENSITIVE INFORMATION

Mark an “X” at “Yes” if the nomination contains sensitive information that should be withheld under Section 304 of the National Historic Preservation Act; otherwise mark an “X” under “No.” The NPS shall withhold from public disclosure any information about a resource’s location, character, or ownership, or concerning a resource’s history, character, or significance by request of the owner, the nomination preparer, or other stakeholders, if the Keeper of the National Register agrees that disclosure may:

- cause a significant invasion of privacy;
- risk harm to the historic property; or
- impede the use of a traditional religious site by practitioners.

In such instances, any notifications about the NHL nomination will not provide the property’s specific address information, but rather the county only. The NPS will also work with the nomination preparer to redact (exclude) the location and/or other pertinent information from documentation made available to the public, as requested. This may include some or all of the maps and photos submitted with a nomination as well as explanatory and historical information presented in the narrative. For more information on the redaction process, contact NHL program staff.

NEW PHILADELPHIA TOWNSITE, PIKE COUNTY, ILLINOIS

(DESIGNATED JANUARY 16, 2009)

New Philadelphia was founded in 1836 and is the first known town platted and officially registered by an African American before the American Civil War. Archeological analysis at New Philadelphia reflects new trends within historical archeology that seek to understand how material culture and racial identity interact. This analytic approach has the potential to significantly contribute to new ideas and theories about how to study race through the archeological record. At New Philadelphia, researchers have an opportunity to investigate both the relationships of formerly enslaved individuals, free born African Americans, and people of European descent who lived together in a small rural community, and the effects of interaction between the groups. NPS IMAGE, PHOTOGRAPHER UNKNOWN, N.D.



SECTION 4 GEOGRAPHICAL DATA

1 ACREAGE OF PROPERTY

Enter the number of acres comprising the property. If known, acreage should ideally be recorded to the nearest tenth of an acre, but at a minimum the acreage should be accurate to the nearest acre. If the property is substantially smaller than one acre, the phrase “less than one acre” may be employed. For nominations with discontinuous boundaries (see below), the acreage for each individual parcel and a sum total should be provided.

2 USE EITHER LATITUDE/LONGITUDE COORDINATES (PREFERRED) OR THE UTM COORDINATE SYSTEM

Enter latitude/longitude coordinates or UTM reference points to identify the exact geographic location of the property. The use of a Geographic Information System (GIS) to obtain latitude/longitude coordinates and to produce the requisite location map (see below) is highly recommended. Please contact NHL Program staff for the latest guidance on obtaining locational data.

Coordinate information provided in this section should correspond exactly to the proposed NHL boundary, and to the location map submitted as part of the nomination package. Each set of coordinates should be clearly defined in the nomination, and the individual coordinates labeled alphanumerically, based on a logical order in which they occur (e.g., in defining the corners of a polygon, counted clockwise), and in such a way as to clearly differentiate between multiple features. All discontinuous resources, whether consisting of individual features or larger parcels, should have their own coordinates or references.

Coordinate data recorded in Section 4 should comply with the following requirements:

- All NHL boundaries should be delineated as one or more polygons. Each corner, or angle point, of the polygon(s) should be entered into Section 4 of the NHL nomination form as a single coordinate point. These points should be ordered sequentially, moving clockwise around the boundary polygon. When providing coordinates for large or especially complicated boundaries, please consult with NHL program staff.
- For properties that include discontinuous districts, boundary coordinates must be provided for each area, and each coordinate set must be clearly defined on the form.
- The datum used must be provided for all entered coordinates (e.g., WGS84, NAD27, NAD83, etc.)
- Latitude/longitude coordinates must be entered to six decimal places and are the preferred method for providing coordinate data in NHL nominations.
- UTM coordinates must indicate the UTM zone, easting and northing. The UTM eastings should contain six digits and the UTM northings seven digits.

PLAYLAND AMUSEMENT PARK, RYE, NEW YORK

(DESIGNATED FEBRUARY 27, 1987)

Conceived by the Westchester County Park Commission and opened in 1928, this first totally planned amusement park in America was specifically designed to accommodate automobile travelers. After more than ninety years, its Art Deco and Spanish Revival attractions remain essentially unaltered, and most of its original rides—the Whip, the Dragon Coaster, and the Derby Racer—continue to thrill. With its well-planned layout and attractive landscaping, Playland has served as a prototype for many contemporary theme parks. NPS IMAGE, PHOTOGRAPHER UNKNOWN, N.D.



ELECTRONIC SUBMISSION OF GIS DATA

Nomination preparers are strongly encouraged to submit electronic GIS spatial data (i.e., shapefiles) for a nominated property, along with the submitted nomination, although currently doing so is not required. This spatial data should comply with the NPS Cultural Resource Spatial Data Transfer Standards. These standards are available online (https://www.nps.gov/crgis/crgis_standards.htm), including templates and other guidance. All provided GIS data must correspond exactly to the latitude/longitude coordinates provided in the nomination and illustrated on the nomination's location map.

BOUNDARIES

Selecting an appropriate and accurate boundary can sometimes be difficult. A nominated property's boundary should derive from its historic significance, period of significance, and the level of integrity of resources it contains. In general, a properly drawn boundary should:

- encompass, but not exceed the full extent of the nationally significant resource(s) and land area making up the property;
- be large enough to include all the property's historic features;
- not be drawn through a building or another type of resource;
- exclude peripheral areas that may have been historically related to the property, but which have lost integrity (e.g., as a result of subdivision and/or redevelopment) or are otherwise no longer related to the resource;
- not create "donut holes" by selectively excluding areas within a property boundary. All resources within an enclosed boundary must be documented in the nomination; resources within the boundary that are not related to the argument for national significance, were added after the period of significance, or have lost their integrity, would be listed as "noncontributing" (See Section 6 below).

Legally recorded boundary lines are frequently used to create an NHL boundary, even when an NHL takes in multiple properties. However, sometimes these legal boundaries may not make sense when considering a property's national significance. In such cases, a boundary may instead use a property's physical features or its surrounding geography as reference points. Such features could include:

- natural features such as ridges, valleys, rivers, and forests;
- manmade features such as buildings and structures, other property lines, stone walls, hedgerows, and the edges of roads, streets, drives, and highways; and
- topographic features and contour lines.

Boundaries for buildings, structures, and objects should encompass the entire resource—its historic features as well as later additions—and include surrounding land that contributes to the property's national significance and that retains integrity. For properties consisting of a singular resource, consideration of a property's boundaries should not be restricted to the footprint of an individual building or structure. Rather, they should follow a larger perimeter that encompasses both the singular resource and an appropriate portion of the surrounding area. For movable structures, such as boats and ships and railroad cars and locomotives, the boundary is usually limited to the resource itself. The surrounding land or

water, on which the resource is located, is considered a part of its larger setting, but would not be considered within the boundary.

URBAN/SUBURBAN VS. RURAL BOUNDARIES

In most cases, NHL boundaries for urban and suburban properties follow those of their legal parcel(s). These boundaries often reflect the historical extent of the property. In contrast, using legal parcels to establish boundaries is less effective for resources located in rural areas, where parcels do not necessarily correspond with nominated resources. In such cases, the NHL boundary should reflect the size, placement, grouping, and arrangement of the resource(s), requiring a solid understanding of the resource, its significance and integrity, as well as that of the surrounding area. Establishing an NHL boundary depends upon the nature of the resource, input from the owner, and a host of other factors best known to the nominator.

HISTORIC DISTRICT BOUNDARIES

Boundaries for districts often require more time and effort to fully ascertain. They typically encompass a single area of land containing a concentration of buildings, structures, objects, and/or sites that importantly convey a property's national significance. An intimate knowledge of the district's area(s) of national significance, its period of significance, and its high degree of integrity guide the delineation of its boundaries.

Although a lack of integrity may moderate historically appropriate boundaries for historic districts, the following factors should be considered:

- obvious visual or geographic barriers that mark a change in the area's historic character or break its cohesiveness, such as roads or highways, large-scale development of a different character (whether historic or contemporary), or natural barriers such as lakes, rivers, or streams;
- subtle visual changes in the area's historical and/or architectural character due to different building types, landscape shifts, or varied stylistic modes, which could mark a decline in the concentration of contributing resources related to a district's significance;
- legal boundaries at a specific time in history, such as original city limits or the original legally recorded boundaries of a housing subdivision, estate, or ranch;
- clearly differentiated patterns of historic development, such as commercial, residential, industrial, or agricultural use(s), and their relations to each other over time;
- the historic extent of an industrial complex;
- the historic functions of an agricultural landscape; and
- the concentration of archeological deposits and/or associated archeological sites.

NHL Program staff is available to assist in determining an appropriate district boundary (see additional guidance about NHL districts in Chapters 5 and 6).

ARCHEOLOGICAL SITES

Selecting boundaries for archeological sites and archeological districts depends primarily on the scale, horizontal extent, and nature of the relationship among



**BENJAMIN BANNEKER SW-9
INTERMEDIATE BOUNDARY STONE,
ARLINGTON COUNTY, VIRGINIA**
(DESIGNATED MAY 11, 1976)

The Benjamin Banneker SW-9 Intermediate Boundary Stone was designated a nationally significant object because it is one of the forty boundary stones that outlined the original boundary of the District of Columbia. This property is also significant for its association with Benjamin Banneker, a free African American farmer, mathematician, inventor, astronomer, writer, surveyor, scientist, and humanitarian. Major Andrew Ellicott, appointed by President George Washington in 1791 to survey the District of Columbia, selected Benjamin Banneker to be his scientific assistant. The stone represents Banneker's genius and scientific work, and the contributions of African Americans to the nation in its early years. NPS IMAGE BY PATTY HENRY, JANUARY 2023

**WALRUS ISLANDS
ARCHEOLOGICAL DISTRICT,
DILLINGHAM CENSUS AREA, ALASKA**
(DESIGNATED DECEMBER 23, 2016)

Walrus Islands Archeological District is one of the few remaining places with evidence of human occupation of the Bering Sea continental shelf when sea levels were substantially lower than at present. Cultural remains dating between 6,300 and 200 years old in the Walrus Islands have yielded and are likely to yield information that contributes to our knowledge of the development of Arctic and Subarctic cultural traditions in the United States. The earliest inhabitants of Round Island, one of seven islands in the district, were marine-adapted, hunting walrus on the beaches of the island, and they practiced more generalized settlement and subsistence patterns than previously recognized by Alaska researchers. NPS IMAGE, PHOTOGRAPHER UNKNOWN, N.D.



significant features and deposits. A regional pattern or assemblage of remains, a location of repeated habitation, the location of a single habitation, or some other distribution of archeological evidence, all imply different spatial relationships. Although it is not always possible to conclusively determine the boundaries of a site or district, knowledge of local and regional cultural history and related features (e.g., site types) can help define an archeological property's geographical extent. One should consider a property's setting and physical characteristics along with archeological survey results to determine the most suitable approach.

Nomination preparers can obtain evidence to help define archeological site or archeological district boundaries from any of several reliable sources:

- results of subsurface testing, including test excavations, core and auger borings, and the observation of cut banks or visible strata;
- data generated by non-invasive remote sensing techniques such as magnetometer survey, ground-penetrating radar, and metal detection, among others;
- statewide archeological, LiDAR, or other surveys available from SHPOs;
- surface observation of site features and materials uncovered by plowing or other ground disturbance, or that have remained on the surface since deposition;
- observation of topographic or other natural features that may or may not have been present during the period of significance;
- observation of land alterations subsequent to site formation that may have affected the site's integrity; and
- historical and ethnographic evidence, such as maps, published ethnographies, oral history interviews, and personal journals and accounts.

Lacking such sources, boundaries may also be chosen by conservatively estimating the extent and location of significant features. In such instances, a nomination's boundary justification section must include a thorough explanation of the reasons for selecting the boundaries. If an owner has denied access to an archeological resource and archeological testing is not possible, then boundaries may be drawn along the legal property lines of the portion that is accessible, provided that the accessible portion by itself has sufficient significance and integrity, and the archeological site's full extent is unknown.

DISCONTIGUOUS BOUNDARIES

Sometimes the inclusion of discontinuous parcels is warranted within a single NHL nomination because they contain contextually related resources, but the character of the intervening area does not support a single boundary. A nominated property may include discontinuous elements under the following circumstances:

- when visual continuity is not a factor of historic significance and the intervening space lacks significance and/or integrity (e.g., a cemetery historically associated with, but located outside of a rural village);
- when a district has been divided by intervening development or highway construction and the separated portions are determined to have sufficient significance and integrity; or
- when one or several outlying archeological sites directly relates to a district, either through common cultural affiliation or as related elements of a land use pattern.

The following examples provide different justifications for why discontinuous parcels were appropriate for three NHLs.

NORTHWEST BRANCH, NATIONAL HOME FOR DISABLED VOLUNTEER SOLDIERS in Milwaukee, Wisconsin, outstandingly represents the nationally significant development of a national system of medical and residential benefits for disabled volunteer veterans following the Civil War. The NHL consists of two discontinuous parcels. An interstate highway bisected the original campus in 1962, leaving significant features which help to convey the historic campus's national significance situated on both sides.

Boundaries of the 153-acre **HARRY S TRUMAN HISTORIC DISTRICT**, in Independence, Missouri, include residential, commercial, institutional, and governmental properties that have strong historical associations with the thirty-third President of the United States. The Missouri Pacific Railroad Depot, the station he used from boyhood through the presidency, was included as a discontinuous parcel because of intervening growth and change in the town of Independence, particularly in the blocks between the significant depot and the principal portion of the district.

OLD SALEM HISTORIC DISTRICT in Winston-Salem, North Carolina is nationally significant both for its establishment and growth as a Moravian community in the eighteenth and nineteenth centuries as well as the preservation of that community's architectural legacy during the second half of the twentieth century. The district includes three discontinuous parcels: the area of the historic town core, Salem's only extant outlying eighteenth-century farmhouse, and the archeological site of the springs that fed the town's 1778 water system.

3 VERBAL BOUNDARY DESCRIPTION

A nomination's verbal boundary description serves as the legal basis for defining the extent of an NHL designation. Therefore, it must accurately and precisely describe the property boundary, based on the aforementioned guidance. The preparer may use a legal parcel number(s); block and lot numbers; a sequence of metes and bounds; the dimensions of a parcel of land fixed upon a given point, such as the intersection of two streets, a natural feature, or a manmade structure;

**POSTON ELEMENTARY SCHOOL,
UNIT 1, COLORADO RIVER RELOCATION
CENTER, LA PAZ COUNTY, ARIZONA**
(DESIGNATED OCTOBER 16, 2012)

Poston Elementary School, Unit 1, Colorado River Relocation Center is nationally significant for its association with Japanese American history during World War II. The Colorado River Relocation Center (Poston), was the second of ten relocation centers established for the confinement of Japanese Americans during World War II following President Franklin D. Roosevelt's signing of Executive Order No. 9066 in 1942. Poston is the only relocation center to retain an above-ground complex of elementary school buildings. The educational facilities at Poston were designed and built by the interned Japanese Americans using the preferred local material, adobe bricks. NPS IMAGE BY FRONT RANGE RESEARCH ASSOCIATES, INC. 2010



or a narrative using street names, property lines, geographical features, and other lines of convenience to describe the boundary. If a property contains discontinuous parcels, each separate section of the property should have its own verbal boundary description.

Alternatively, the verbal boundary description may reference a detailed location map instead of providing a lengthy narrative statement (see the section on preparing location maps below). At minimum, the description should note that the boundaries are shown on the accompanying location map and provide the title of that map. The map must clearly indicate the exact boundaries of the property, illustrate any relationships to standing structures or natural or manmade features such as rivers, highways, or shorelines, and include a scale, north arrow, and datum.

4 BOUNDARY JUSTIFICATION

Provide a brief and concise explanation of the reasons for selecting the boundaries. The reasons should be an explanation of those factors supporting the boundary's definition, such as the property's resources, historic associations, attributes, or integrity—not an administrative history of how the boundary was selected. The property's characteristics, the irregularity of the boundaries, and/or the methods used to determine those boundaries will determine the complexity and length of the boundary justification. Property ownership alone is typically not sufficient justification for a boundary, except in cases where ownership is directly related to its national significance.

A paragraph or more may be needed to justify complex or atypical boundaries. A few examples include: when boundaries are irregular and follow natural or manmade reference points; where large portions of historic acreage have been lost; or where a district's boundaries are ragged or highly irregular at the edges. Properties with substantial acreage may require more explanation than those limited to small lots. Boundaries for archeological properties often also call for longer justifications, as they commonly refer to methods of investigation, the distribution of known sites, the reliability of survey-based predictions, and the amount of unsurveyed acreage. For districts with discontinuous parcels, the nomination must explain how the property meets the conditions for a discontinuous district as well as how the boundaries were selected for each corresponding area.

Three examples of verbal boundary descriptions and boundary justifications follow.

**POSTON ELEMENTARY SCHOOL, UNIT 1, COLORADO RIVER
RELOCATION CENTER, LA PAZ, ARIZONA (NHL, 2012)**

Verbal Boundary Description as noted in the NHL nomination:

"The nominated area, delineated on the included to scale sketch map, is situated in Section 35, Township 8 North, Range 21 West, Gila and Salt River Meridian. The nominated area is bounded on the east by the west edge of the paved road lying east of the school complex; on the south by the north edge of Poston Road; on the west by the west edge of the north-south ditch lying west of the

**DENVER CIVIC CENTER,
DENVER, COLORADO**

(DESIGNATED OCTOBER 16, 2012)

The Denver Civic Center is nationally significant as an outstanding representation of the City Beautiful movement and its widespread impact on American cities through the creation of planned civic centers in the early twentieth century. The Denver Civic Center is an outstanding public landscape and collection of public buildings and monuments unified by Beaux-Arts influenced architecture and formal principles of landscape design. Laid out in a sequence of four public spaces, the civic center extends along a linear axis from the Colorado State Capitol on the east to the Denver City and County Building set against the backdrop of the Front Range of the Rocky Mountains on the west. NPS IMAGE BY FRONT RANGE RESEARCH ASSOCIATES, INC. 2004

school complex; and on the north by the north edge of the east-west ditch lying north of the school complex.”¹

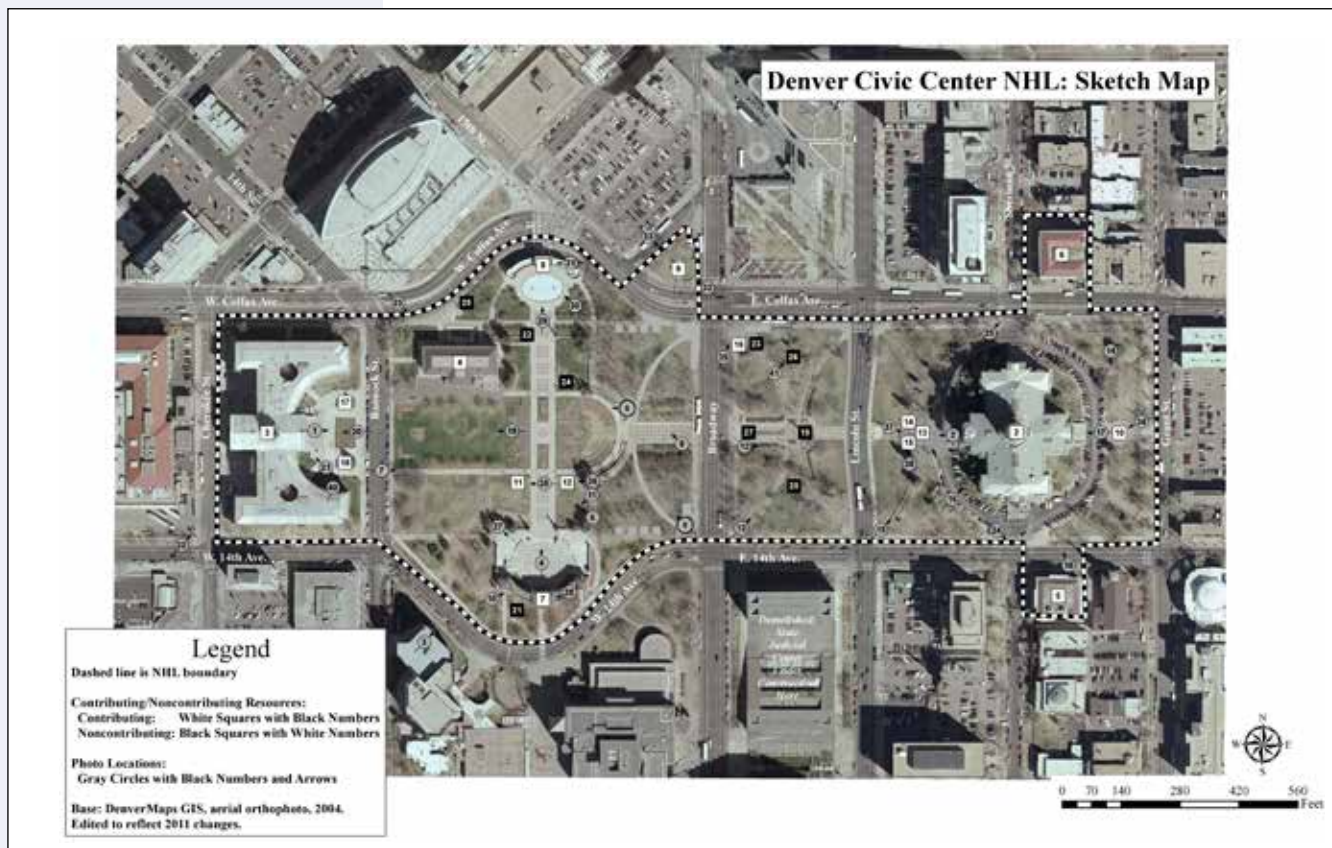
Boundary Justification as noted in the NHL nomination:

“The boundary was drawn to focus on the Poston I Elementary School complex and include[s] contiguous extant resources associated with the Colorado River Relocation Center (Poston) that retain historic significance and integrity.”²

DENVER CIVIC CENTER, DENVER, COLORADO (NHL, 2012)

Verbal Boundary Description as noted in the NHL nomination:

“The nominated area, delineated on the accompanying sketch map (drawn to scale), is situated in the central part of the City and County of Denver, immediately south of the central business district. The boundary is described as follows: beginning at the intersection of East Colfax Avenue and Grant Street; thence south along the west edge of Grant Street to its intersection with the north edge of East 14th Avenue; thence west for approximately 169’ to the east property line (extended) of 200 East 14th Avenue (the former State Museum Building); thence south and west along the property line of that building to its intersection with the east edge of Sherman Street; thence north along Sherman Street to the north edge of East 14th Avenue; thence west along the north edge of 14th Avenue to its intersection with the east edge of Cherokee Street; thence north along Cherokee Street to its intersection with the south edge of West Colfax Avenue; thence east along the south edge of West Colfax Avenue to Cheyenne Place; thence northeast



along the south edge of Cheyenne Place to the west edge of Broadway; thence south along the west edge of Broadway to its intersection with the south edge of West Colfax Avenue; thence east along the south edge of East Colfax Avenue to its intersection with the east edge of Sherman Street; thence north along Sherman Street to its intersection with the north property line of 201 East Colfax Avenue (the State Office Building, excluding the parking lot to north); thence east and south along the property line to its intersection with the south edge of East Colfax Avenue; and thence east along the south edge of East Colfax Avenue to the point of beginning at Grant Street.”³

Boundary Justification as noted in the NHL nomination:

“The boundaries of the Denver Civic Center encompass the public landscape and related government buildings that were developed between 1890 and 1935 and form the core of Denver’s center of state and local government. Although other government buildings lie outside the proposed boundaries, the boundaries are drawn to include only those that reflect the City Beautiful origins of the civic center, historic plans dating from 1885 to 1932, and unifying influence of Beaux Arts design.”⁴

FREDERICK A. AND SOPHIA BAGG BONANZA FARM, RICHLAND COUNTY, NORTH DAKOTA (NHL, 2005)

Verbal Boundary Description as noted in the NHL nomination:

“NW 1/4 Section 17 and NE 1/4 Section 18, Township 132N Range 49W. Commencing at a point 382 feet south of the northwest corner of Section 17, Township 132 North, Range 49 West, proceed 206 feet due east, 588 feet south, 700 feet west crossing the section line, 770 feet north, 500 feet east to the section line, and 182 feet south to the point of origin.”⁵

Boundary Justification as noted in the NHL nomination:

“This boundary incorporates the full extent of land owned by the Bagg Bonanza Farm Historic Preservation Society, and incorporates all extant buildings associated with the historic Bagg Farm that retain historic integrity. This boundary is identical to that identified in the National Register of Historic Places nomination. The boundary does not incorporate the land surrounding the building complex, which remains in agricultural production, because the variety of crops grown in the area has increased and changed since the period of significance. However, the sense of place remains quite strong.”⁶

FREDERICK A. AND SOPHIA BAGG BONANZA FARM, RICHLAND COUNTY, NORTH DAKOTA

(DESIGNATED APRIL 5, 2005)

The Bagg Bonanza Farm represents broad patterns of agricultural development in the Northern Great Plains of the US from the 1880s through the Great Depression. Bonanza farms, or “farm factories,” are significant components of our national agricultural history, representative of the importance of federal land policies and of technological and scientific advances to American agricultural production. The impact of American urbanization—concentrated markets for farm products—and transportation developments also contributed to the development of these huge farms on the open land of the northern prairies. NPS IMAGE BY HISTORICAL RESEARCH ASSOCIATES, JUNE 2004



SECTION 5 SIGNIFICANCE STATEMENT AND DISCUSSION

This section of the NHL nomination form contains the principal argument for a property's national significance. It identifies and presents the nationally significant history under one or more of the NHL Criteria (see Chapter 5). It also includes a comparative analysis demonstrating that the property is among the best for illustrating, interpreting, or commemorating these themes, contexts, or areas of history (see Chapter 8).

INTRODUCTION: SUMMARY STATEMENT OF SIGNIFICANCE

Section 5 should begin with a concise introduction that clearly lays out the case for the property's national significance. The introduction can be as short as a single paragraph, and generally should not exceed two or three paragraphs in length. It should be clearly written, be free of all extraneous detail, and should:

- identify the nationally significant history documented by the nomination and state under which of the NHL Criteria the property is being nominated;
- provide a brief synopsis of why the nationally significant history specifically relates to the nominated property;
- indicate which of the NHL Criteria Exceptions apply, if any, and explain how the property meets their requirements.

A well-written introduction should serve as an abstract and provide ready comprehension of why a property is nationally significant, and outline how the remainder of Section 5 demonstrates this information.

Provide relevant property-specific history, historical context, and themes. Justify criteria, exceptions, and period(s) of significance listed in Section 2.

Following the introduction, Section 5 should present a compelling argument for the property's ability to illustrate or interpret a nationally significant aspect of American history. The text must fully document the case for national significance in as clear and succinct a manner as possible, including these essential parts:

- a discussion of the nationally significant history importantly associated with or represented by the property;
- the presentation of relevant historical background in a manner that clearly ties the property's site-specific history to the larger national context(s);
- a comparative analysis of similar properties that supports the property's relative national significance (see Chapter 8); and
- a concluding paragraph that summarizes the case for the property's national significance.

Section 5 should be organized using topical headings. The development of each essential section, as outlined above, may require more than one topical heading.

Section 5 should be a formal piece of persuasive writing, fully referenced with footnotes and based on current scholarship and primary source research. Nomination preparers should refrain from using superlatives (e.g., best, oldest,

**SMITHFIELD STREET BRIDGE,
PITTSBURGH, PENNSYLVANIA**

(DESIGNATED MAY 11, 1976)

The Smithfield Street Bridge spanning the Monongahela River in Pittsburgh is nationally significant as a benchmark in the history of American engineering. This structure is one of the earliest steel trusses constructed in the United States and its lenticular truss design was Gustav Lindenthal's first major commission. Lindenthal would become one of the nation's foremost civil engineers. COURTESY OF BILL BADZO, JANUARY 2008



largest, etc.) and making grandiose statements that might sound impressive, but are not substantiated. If necessary, block quotations can be used to advance an argument about a property's national significance; however, long block quotations should be avoided, as they can disrupt the narrative and cloud the argument rather than enhance it.

Section 5 must clearly link the physical place proposed for designation to its nationally significant history. This linkage should consider the following questions:

- What nationally significant activities occurred at the property during its period of significance?
- How was the property involved with this activity? Be specific in how the property and its features are connected to and/or convey the property's nationally significant history.
- How does the property reflect the activities that occurred there during its period of significance?
- If nominated for its design, how does the property relate to properties of similar design, period, or method of construction?
- How were the site-specific activities connected to or informed by events, trends, or other activities happening at the local, regional, or national levels?
- If significance is derived from association with intangible cultural values or ideals, what aspects of the property's nationally significant history are essential for understanding this connection?
- If nominated for its information potential, what nationally significant information does the property have the potential to yield in the future?



WILSON DAM, COLBERT AND LAUDERDALE COUNTIES, ALABAMA

(DESIGNATED NOVEMBER 13, 1966)

Wilson Dam was begun by the US Army Corps of Engineers in 1918 to harness energy at the Tennessee River's Muscle Shoals. The 4,535-foot-long concrete structure was completed in 1925 and became the first hydroelectric unit of the Tennessee Valley Authority (TVA) when it was created in 1933. One of TVA's cornerstones, Wilson Dam still has the largest hydroelectric generating capacity of any of the Authority's thirty-three major dams. NPS/HAER

IMAGE BY JET LOWE, 1994

National Register documentation for a property may sometimes be reused in an NHL nomination; however, doing so must be disclosed to and approved by NHL Program staff in advance. Even when found appropriate, the NHL Program will require additional information such as a comparative context. The resulting NHL nomination should include a footnote explaining what parts of the National Register document were reused. If the preparer is not the same person who generated the National Register document, both persons should be listed as co-authors in Section 8 of the NHL nomination form. As a professional courtesy, the nomination preparer should also attempt to contact the author of the National Register document to inform them that their work has been incorporated into a subsequent NHL nomination.

Section 5 should feature a comparative analysis that follows presentation of the nationally significant and related site-specific history and that demonstrates the nominated property's national significance in comparison to other similar properties. At minimum, the comparative analysis should contain two parts:

- an explanation of the methodology used to identify similar properties; and
- analytical comparisons of the nominated property with these similar properties.

The analysis should begin with an explanation of the method used to craft the comparative universe for the nominated property and to identify and describe specific comparable properties. In the uncommon situation that there are no logical comparable properties, the explanation should discuss why this is the case. (For a more detailed discussion of what is expected in this portion of the form, see Chapter 8: Comparative Analysis).

SECTION 6 PROPERTY DESCRIPTION AND STATEMENT OF INTEGRITY

OWNERSHIP OF PROPERTY

Mark an “X” to indicate the ownership of the nominated property—private and/or public (local, state, and/or federal). Select all that apply.

CATEGORIES OF PROPERTY

Mark an “X” to indicate the type of property—building, structure, object, site, and district—that best defines the nominated property as a whole.

The following are the definitions for each property type:

Building: *a structure created to shelter any form of human activity, such as a house, barn, church, hotel, or similar structure. Building may refer to a historically related complex such as a courthouse and jail or a house and barn.*

To be defined as a “building,” a property typically must have a roof and walls. Without these elements, it should most likely be counted as a structure. Similarly, a building that no longer retains its basic structural elements (i.e., roof and walls) is generally considered a “ruin” and should be counted as a site. Depending on their relationships, a small group of closely related buildings, such as those cited in the definition above, may be identified either as a building or district.

Examples: barns, churches, city halls, commercial buildings, courthouses, factories, garages, hotels, houses, libraries, mills, schools, sheds, social halls, stables, stores, and train stations.

Structure: *a work made by human beings and composed of interdependent and related parts in a definite pattern of organization.*

The definition of “structure” provided in the federal regulations for the NHL Program is fairly broad, and could apply to several of the other property types. In practice, structures are distinguished from buildings in two principal ways, one

**BELLE OF LOUISVILLE
(RIVER STEAMBOAT),
LOUISVILLE, KENTUCKY**
(DESIGNATED JUNE 30, 1989)

Belle of Louisville launched in Pittsburgh in 1914 as the ferryboat *Idlewild*, is one of only two stern-wheel river passenger boats operating under steam in the nation and is the sole remaining Western rivers day packet boat. Used as a towboat during World War II, it has served as an excursion boat since the 1960s. With its canopied pilothouse, jaunty stacks, and sternwheel, the *Belle* epitomizes the riverboat era on America’s western waters. COURTESY OF THE CAROL M. HIGHSMITH ARCHIVE, LIBRARY OF CONGRESS, PRINTS AND PHOTOGRAPHS DIVISION, JULY 2020



**STEPHEN TABER (SCHOONER),
ROCKLAND, MAINE**

(DESIGNATED DECEMBER 4, 1991)

From its launching in 1871 until 1920, this two-masted schooner plied the waters of New York Harbor and its environs carrying all sorts of cargo. After 1920, *Taber* served similarly in Maine's Penobscot Bay, and in 1946 it became a Maine windjammer. *Taber* and *Lewis R. French*, also an NHL, are the oldest documented American sailing vessels known to have been in continuous service since their launching. NPS IMAGE, PHOTOGRAPHER UNKNOWN, N.D.



based on function and one based on physical characteristics. The former includes any artificial construction not principally created to shelter human activity. The latter includes artificial constructions that lack a roof and/or walls. A property should be counted as a structure in either case. For example, a bandstand provides shelter for human activity, but lacks walls and is open sided; and a kiln might feature a roof and walls, but does not principally shelter human activity. Similarly, a structure that no longer retains its character-defining elements is generally considered a “ruin” and would be counted as a site.

Examples: aircraft, bandstands, boats, bridges, cairns, canals, carousels, dams, earthworks, fences, firetowers, gates, gateways, gazebos, grain elevators, hahas, kilns, levees, locks, mounds, palisade fortifications, paths, railroad locomotives and cars, roadways, ships, shot towers, silos, telescopes, trails, tunnels, turbines, and windmills.

Object: *a material thing of functional, aesthetic, cultural, historical or scientific value that may be, by nature or design, movable yet related to a specific setting or environment.*

Distinct from buildings and structures, the term “object” is a construction or work that is typically artistic in nature or small in scale and often, but not always, simply constructed. Although it could feasibly be movable, an object must have association with a specific place, and is usually fixed in a specific location. Objects included within the boundary of an NHL are commonly part of larger designed landscapes and/or have a commemorative purpose; however neither condition is a requirement. In some instances, objects are contained within sites, buildings, or structures. For example, the nationally significant Davis-Ferris Organ (NHL, 2016) is located within the Round Lake Auditorium in the Village of Round Lake, New York. There are also certain classes of movable objects associated with properties considered for NHL designation, which cannot be individually counted as contributing or noncontributing resources. See the section titled “Collections” in this chapter and also in Chapter 6 for more on such movable objects.

Examples: boundary markers, fountains, monuments, sculpture, and statuary.

Site: *the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined or vanished, where the location itself maintains historical, [cultural], or archeological value regardless of the value of any existing structure.*

A “site” most commonly refers to an archeological site or a place where the significance of the location itself is generally considered equal to, if not more important than, the resources it contains. A site can be a landscape that generally lacks buildings, structures, and objects, but is noted for its significance as the place where a nationally significant event occurred. A site can also be a designed space that contributes to a nominated building, structure, object, or district. Ruins are classified as sites.

Examples: areas of land having cultural significance (such as battlefields,



DAVIS ORIOLE EARTHLODGE SITE, MILLS COUNTY, IOWA

(DESIGNATED OCTOBER 16, 2012)

The Davis Oriole Earthlodge Site is nationally significant for its exceptional value in the study of the predominant Plains Village habitation type—lodges. There are no extant buildings or structures. However, the archeological deposits at this site embody all the distinctive characteristics of homes belonging to early indigenous farmers, which typify sites of the Nebraska phase of the Central Plains tradition. This site is equally significant for its demonstrated potential to yield information of major scientific importance about a period of great innovation, when people across much of North America experienced profound cultural change related to the transition from modest horticultural practices to increasingly complex agricultural intensification. NPS IMAGE BY WILLIAM E. WHITTAKER, 2009

campsites, cemeteries, ceremonial sites), designed landscapes, funerary sites, gardens, grounds, habitation sites, hunting and fishing sites, petroglyphs, rock carvings, rock shelters, the ruins of historic buildings and structures, shipwrecks, sites of treaty signings, vernacular landscapes, village sites, and natural features ascribed cultural values, such as springs and rock formations.

District: *a geographically definable area, urban or rural, that possesses a significant concentration, linkage or continuity of sites, buildings, structures or objects united by past events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history. (This last instance would constitute what is commonly referred to as a discontinuous district.)*

Establishing a “district” provides a means to recognize groups of resources that share a common history, which together tell a nationally significant story, and/or to recognize the important associations demonstrated by the physical relationships of such resources. As a property type, districts are closely related to NHL Criterion 5, although any of the criteria may apply. In many cases, nominations for districts have significance under NHL Criterion 5 in addition to other criteria.

Examples: canal systems, central business districts, civic centers, college campuses, collections of habitation and limited activity sites, commercial areas, industrial complexes, irrigation systems, large estates, farms, plantations, ranches, large forts, large landscaped parks, residential neighborhoods, rural villages, and transportation networks.

RELATED PROPERTY CLASSIFICATIONS

There are several property classifications, which are widely utilized in preservation practice, that provide frameworks for better understanding certain kinds of resources. These classifications are not property types for the purposes of the NHL Program or its process, but can be applied to one or more of the five property types.

Cultural Landscape

The term “cultural landscape” is used widely in scholarly works and preservation practice to describe a geographic area associated with particular people, events, or cultural or aesthetic values. Both natural and cultural resources are important components of cultural landscapes, which are more explicitly defined by terms such as designed landscapes, rural historic landscapes, historic urban landscapes, vernacular landscapes, historic sites, and ethnographic landscapes. Several NPS programs use this terminology. The UNESCO World Heritage Convention recognizes designed and created landscapes, which include gardens, parks, and other designed spaces; organically evolved landscapes (either relict landscapes or continuing landscapes), where cultural influences and adaptation to the natural environment merge; and associative cultural landscapes, which have “powerful religious, artistic or cultural associations of the natural element rather than material cultural evidence.”⁷

The NHL Program has not adopted particular terminology for cultural landscapes but accepts the use of terms as explained in the NHL nomination. The program also accepts the use of “landscape” without “cultural” modifying it. NHL nomination preparers should consider reviewing National Register landscape guidance and instructions for more detailed discussions about nominating significant landscapes.

Cultural landscapes/landscapes are considered a category or component of historic districts or sites, and thus are nominated for NHL designation as one of these two property types. Significance in cultural landscapes may be attributed to virtually any aspect of history and culture, and landscapes may be significant under any of the NHL Criteria. Some common themes of landscape significance are maritime history, agriculture, industry, conservation, planning, recreation, and landscape architecture.

Traditional Cultural Places

Traditional Cultural Places (TCPs) are frequently a type of cultural landscape, although TCPs can also be urban spaces. TCPs reflect intangible cultural values tied to physical places. They have maintained significance to a specific culture or people over time. They must be nominated as one of the standard property types: building, structure, site, object, or district.

The NPS defines a traditional cultural place (TCP) as a building, structure, object, site, or district that may be eligible for inclusion in the National Register because (1) it is significant to a living community because of its association with beliefs, customs, or practices that are rooted in the community’s history and that are important in maintaining the community’s cultural identity and (2) it retains its ability—its integrity—to convey its significance. A TCP is honored and utilized by a living community of people and passed down through generations, usually orally or through practice, thus, its period of significance extends to the present. It is much more common for TCPs to have the local or statewide significance required for National Register listing rather than national level significance.⁸

McKEEN MOTOR CAR #70 (VIRGINIA & TRUCKEE RAILWAY MOTOR CAR #22), CARSON CITY, NEVADA

(DESIGNATED OCTOBER 16, 2012)

Built between 1905 and 1920, the McKeen Motor Car #70 is the best surviving example of the first commercially viable application of internal combustion power in a self-propelled railroad car. The success of this design allowed railroad passenger, mail and express service to be provided and maintained in thousands of lightly populated communities across the country. McKeen’s use of clean exterior lines, nautically inspired porthole windows, an aerodynamic (“wind-splitter”) wedge-shaped nose and rounded tail, and a self-supporting tensed steel-car body, were innovations that later became industry standards. NPS

IMAGE BY LEE HOBOLD, MARCH 2010



**KAM WAH CHUNG COMPANY BUILDING,
JOHN DAY, OREGON**

(DESIGNATED SEPTEMBER 20, 2005)

Chinese mercantile and herb stores were the cultural, social, labor, and religious center for Chinese immigrants in the American West. With its unrivaled collection of herbal medicines, mercantile records, and other artifacts dating from the late nineteenth and early twentieth centuries, the Kam Wah Chung Company Building is the best-known example of one of these stores in the United States. Representing the Chinese role in the post-Civil War expansion period of the American West, this building continues to reflect its long period of use, from the 1870s until 1950, when it was closed and sealed much like a time capsule. NPS IMAGE BY SALLY DONOVAN, NOVEMBER 2001



Collections

A collection of movable objects within or on a property can hold historic significance to the nation. However, collections can only be referred to as part of a designated NHL if they are present in a nationally significant building, structure, object, site, or district. As it is conceivable that a collection could be dismantled at some point in the future, it is problematic to justify a collection as a place-based resource by itself. Institutions whose national significance relates to the prominence of its collection(s) can be considered for designation, but the nomination must connect the institution to a physical place and its collections are not counted as contributing or noncontributing resources.

For example, the national significance of the Frick Collection and Frick Art Reference Library Building (NHL, 2008) in New York City is partly based on the museum's institutional stature as a world-renowned art collection. The nomination discusses the collection in the context of the building that houses the museum and related reference library—both its original construction and the additions created for its transition from a private home to a publicly accessible museum. The Frick could build a new museum and move the collections to this new building; however, the current building would retain its designation as the best place to tell the story of one of the nation's most august cultural institutions. This should be a benchmark for any building containing a significant collection.

Archeological Collections

Archeological collections are similarly considered. They can contribute to a property's national significance because of their potential to provide important data, which in combination with intact resources at a site, may aid in answering research questions. Moreover, inventoried collections may provide evidence of the types and quantities of artifacts present at a site. While the existence and disposition of recovered collections are an important component of a property's integrity and research potential, they cannot be designated an NHL unto themselves. Designation as an NHL under Criterion 6 primarily concerns the significance and integrity of in situ deposits and features composing a site. If related archeological collections do exist, then nominations should present a basic description of the collections associated with the site, including information about their location, origin, and current disposition.

NUMBER OF RESOURCES WITHIN BOUNDARY OF PROPERTY

Enter the number(s) of contributing and noncontributing buildings, structures, objects, and sites for each property type and calculate the total for both. The property type “district” is not counted on the NHL nomination form because it is understood that contributing and noncontributing resources collectively comprise a district.

CONTRIBUTING RESOURCES

A contributing building, structure, object, or site is a resource that played a role or, more simply, existed within the boundaries of a nominated property during its period of significance. A contributing resource is one that:

- relates to the documented national significance of the property;
- was present during the period of significance; and
- possesses a high degree of integrity (although resources within a district can be considered contributing without individually possessing a high degree of integrity).

NONCONTRIBUTING RESOURCES

A noncontributing building, structure, object, or site is a resource located within the boundaries of a nominated property that:

- does not relate to the documented national significance of the property;
- was not present during the period of significance; or
- through alterations, disturbances, additions, or other changes, no longer retains integrity.

If a nominated property includes National Register-listed resources not associated with the NHL’s documented national significance, they should be counted as non-contributing resources in an NHL nomination. However, they should be briefly described and explained.

COUNTING RESOURCES

Counting properties is an activity that can be quite simple—a single building, for example—or rather complicated involving large sites or districts containing hundreds of potential resources. The following points should be considered in the counting of resources.

- If a nomination recognizes a resource as contributing or noncontributing, it should be counted.
- Count all sites, buildings, structures, and objects within an NHL boundary that are substantial in size and scale. Do not count minor resources, such as small sheds or grave markers, unless they strongly contribute to the property’s significance or feature prominently in the historic events that unfolded there.
- Do not count additions to buildings or structures as separate resources. A building and its addition(s) count as one resource. If two buildings or structures were constructed separately and joined together, they are counted as two resources.
- Do not count interiors, facades, or artwork separately from the building or structure of which they are a part.



**WOODLAWN CEMETERY,
THE BRONX, NEW YORK**

(DESIGNATED JUNE 23, 2011)

Located in The Bronx, New York, Woodlawn Cemetery NHL is a 400-acre, active, historic cemetery with more than 300,000 individual interments in approximately 47,000 family lots, 48,000 single grave spaces, and 10 community mausolea. The cemetery also contains 45 hillside tombs and 1,271 freestanding private family mausolea. For the property's NHL nomination, it would have been impractical and unnecessary to count all of these resources individually. However, of those built during the period of significance, 272 buildings, structures, objects, and sites were specifically called out and counted in the nomination. This count included all major resources related to the cemetery's form and design, and those private memorials (mausolea, tombs, monuments, sculpture, and memorial gardens) considered the most important resources constructed during the period of significance.

COURTESY OF THE CAROL M. HIGHSMITH
ARCHIVE, LIBRARY OF CONGRESS, PRINTS
AND PHOTOGRAPHS DIVISION, AUGUST 2018

- Count gardens, yards, parks, vacant lots, or open spaces as sites only if they contribute to the significance of a property. For example, the yard surrounding a house on a typical suburban lot, or a garden located in the backyard of the same house, would not usually be counted as a site if the house was nominated for its association with a nationally significant person or a nationally significant event that had occurred inside.
- Components and features of a cultural landscape should be counted as separate resources. Typically, the landscape is a contributing site, and features of a scale to be considered buildings, structures, and objects are counted as distinct resources. Resources of a scale too small to fit a property type should be described and evaluated, but not counted. For example, historic lights or benches may contribute to the historic character of the site, but they are not of a scale that would be separately counted.
- Count separate areas of a discontinuous archeological district as separate sites. If buildings, structures, or objects exist within the area of a site, these would be counted separately.
- Do not count ruins separately from the site of which they are a part.
- Provide an inventory of all contributing and noncontributing resources. Each entry should be included on a map or site plan, and photo. In addition to individual descriptions, a table at the end of Section 6 can facilitate the resource count. Contact NHL Program staff to discuss 508 compliance requirements for tables.

Whether fully designed or vernacular and accretive in character, sites and districts often involve large numbers of resources. When counting these resources, decisions must be made about which components are individually counted and which can be adequately and accurately presented as features/elements of the property.

**ANDREW WYETH STUDIO AND
KUERNER FARM, DELAWARE COUNTY,
PENNSYLVANIA**

(DESIGNATED JUNE 23, 2011; ADDITIONAL
DOCUMENTATION, BOUNDARY AND NAME
CHANGE AUGUST 25, 2014)

A discontinuous NHL with two component properties, the Andrew Wyeth Studio and Kuerner Farm is nationally significant for these properties' association with world-renowned artist Andrew Wyeth (1917–2009), one of the most prominent American artists of the twentieth century. Wyeth produced significant works of art at both the studio and the farm for over seven decades. From 1933 until 1997, the Kuerner Farm provided studio space, and most importantly, was a primary subject for Wyeth. The Andrew Wyeth Studio (not pictured) was a former schoolhouse where he painted and finished many pieces, serving as his primary studio until his death in 2009. NPS IMAGE BY ROBERT J. WISE, MARCH 2010



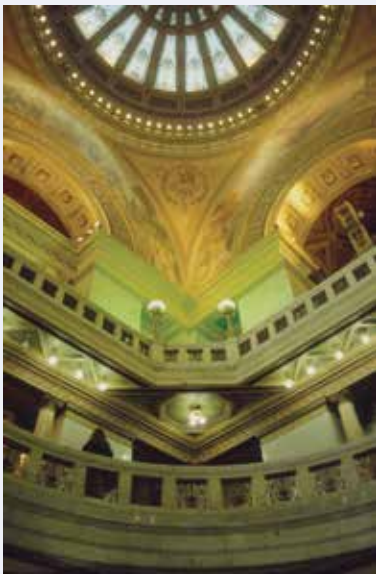
PROVIDE PRESENT AND PAST PHYSICAL DESCRIPTIONS OF PROPERTY

The intent of this part of Section 6 is to provide a written description of the property and its component resource(s), to document those physical qualities that represent and/or embody the property's national significance at the time of nomination, and to gauge its degree of integrity. Section 6 should not include two descriptions of the property—one past, one present. Rather, it should provide a description of its current physical state, which notes any changes made to the property since its period of significance. When combined, this knowledge helps inform evaluation of the property's integrity. Ideally, the property's physical characteristics from its period of significance should essentially correspond to its current physical state, thereby demonstrating its high degree of integrity.

Written descriptions should be thorough, but avoid excessive detail. They also should not be conceived in isolation, but be supplemented by good quality photographs and other types of graphic documentation, such as maps, site plans, and/or floor plans. Sometimes a photograph can convey information about a property's physical state better than text. Conversely, text can provide a level of detail not readable in photographs, such as about the materials, structure, or function of a property.

NHL documentation is incomplete without a description of the landscape within and immediately outside of the boundaries of a nominated property. The broader setting, outside the nominated boundaries, should be described as part of the explanation of the physical context. The area within the boundaries, identified as the "environment" or "immediate setting," requires a more thorough description. It may be categorized as a contributing site, with or without contributing and noncontributing resources and features. Significant landscape features should be described and, depending on scale, counted as contributing resources (typically, objects or structures). Features in the environment that are outside the period of significance or insignificant in scale should be briefly described, with their impact on integrity noted.

The description should begin with a summary paragraph that briefly describes a property's general characteristics, such as its location and setting, its size, what type(s) of resources are included, and any significant features. This paragraph should provide an overview of the property's current physical state, followed by a lengthier narrative with more detailed information.



**ALLEN COUNTY COURTHOUSE,
FORT WAYNE, INDIANA**
(DESIGNATED JULY 31, 2003)

Completed in 1902, the Allen County Courthouse stands as a monument to the progressivism and civic pride of early twentieth-century America and is the embodiment of Beaux-Arts architecture popular in the United States at the turn of the twentieth century. A collaborative effort of architect Brentwood S. Tolan, artists, and craftsmen, the courthouse represents the culmination of classical form, fine art, and applied ornamentation in an American county courthouse. The building's interior murals are among the earliest and most extensive to have been executed during the Progressive Era. NPS IMAGE BY MARSH DAVIS, APRIL 2001

Buildings, Structures, and Objects

Single buildings, structures, or objects are typically the most straightforward resources to describe. Descriptions of these resources should have a logical structure that facilitates an organized understanding of the resource's physical character, such as moving from major elements to minor and from exterior features to interior. The outline below suggests one way a description could be organized. Some portions of the outline could be omitted, if they are not relevant or are not represented in the resource being described.

- A Type or form, such as house, school, or commercial block.
- B Environment and setting—a description of the immediate environment within the nominated boundary and the setting beyond the boundary. The description should include the location of the property in the state or region and physiographic characteristics of the region, briefly stated.
- C Orientation and placement of the resource within the environment (e.g., front or back of the block, on slope or grade, etc.).
- D General characteristics (not necessarily in this order):
 - 1 Number of stories;
 - 2 Exterior wall organization—that is, the number of regular, vertical divisions (e.g., bays);
 - 3 Exterior wall cladding/sheathing, such as brick, stone, wood, or aluminum siding;
 - 4 Roof shape, such as gabled, hip, or shed, and roof cladding/sheathing;
 - 5 Structural system, such as stud framing, reinforced concrete, load-bearing brick or stone, or post and beam; and
 - 6 Overall shape of plan and arrangement of interior spaces.
- E Specific features, such as windows, doors, chimneys, and porches, should be noted if they are important exterior architectural elements. It is not necessary to enumerate every feature if good graphic documentation is provided.
- F Important decorative elements, such as balustrades, bargeboards, brackets, columns, corbelling, finials, half timbering, murals or mosaics, and sculptural relief.
- G Organization and spatial arrangement of the interior floor plan(s). It is not necessary to discuss every room. Rather, this discussion should summarize the arrangement of spaces and how they were used.
- H Significant interior features, such as stairways, doorways, wainscoting, flooring, paneling, beams, vaulting, architraves, moldings, mantels, and chimneypieces. As with the interior floor plan(s), it is not necessary to discuss every feature. Rather, the dominant types of finish and overall character of the interior and its significant spaces should be described.
- I Number, type, and location of other buildings, including outbuildings, with dates, if known. Where a secondary building is architecturally or historically important, such as a gatehouse to an estate, housing for workers, or an agricultural building on a farm, follow the guidelines for D through F above.

- J Other manmade elements, including roadways, contemporary structures, and landscape features.
- K Major alterations or changes to the property, with dates, if known. A restoration is considered an alteration even if an attempt was made to restore the property to its historic form.
- L Deterioration due to vandalism, neglect, lack of use, or weather, if these have had a negative effect on the property's integrity.
- M For properties where landscape or open space adds to its significance or setting, such as rural properties, educational buildings, or public facilities:
 - 1 Historic appearance and current condition of natural features; and
 - 2 Land uses, landscape features, and vegetation that characterized the property during the period of significance, including gardens, walls, paths, roadways, grading, fountains, orchards, fields, forests, rock formations, open space, and bodies of water.
- N For industrial properties where equipment and machinery is intact:
 - 1 Types, approximate date, and function of machinery; and
 - 2 Relationship of machinery to the historic industrial operations of the property.

For properties that have been moved, rehabilitated, restored, or reconstructed, it is necessary to include the date of the action(s), a description of the activities that occurred, and the property's level of integrity following the work. (See Chapter 5 for more information about NHL Exceptions for relocated and reconstructed properties.)

Archeological Sites

Most archeological properties are classified either as a site or as a district. An archeological site is the location of a significant event or of historic human occupation or activity. Descriptions of archeological sites therefore should contain information about the appearance and period when the site was used or occupied, and by whom. The description should also include changes to the environment, setting, and any impacts to the site caused by later events. The nature of the site itself can be detailed in a discussion of its physical characteristics, any previous investigations, and the location of any previously excavated collections. The outline below provides a more detailed list of items to include in the description of an archeological site.

- A Environmental setting of the property today and, if different, its environmental setting during the periods of occupation or use. This discussion should emphasize environmental features or factors related to its location, use, and formation, or the site's state of preservation.
- B Period of time when the property is known or projected to have been occupied or used. Include comparisons with similar sites and districts that have assisted in identification. This discussion should also specify the means by which these facts were derived (e.g., relative vs. absolute chronology, direct vs. indirect dating, etc.).
- C Identity of the persons, ethnic groups, or archeological cultures who, through their activities, created the archeological site and components thereof. This section should include comparisons with similar sites and districts that have informed these identifications.

D Physical characteristics:

- 1 Site type, such as rockshelter, temporary camp, lithic workshop, rural homestead, or factory;
- 2 Prehistorically or historically important standing structures, buildings, or ruins;
- 3 Types, approximate number, and importance of features, artifacts, and ecofacts, such as hearths, projectile points, and faunal remains, respectively;
- 4 Known or projected depth and extent of archeological deposits;
- 5 Known or projected dates for the period when the site was occupied or used, with supporting evidence;
- 6 Vertical and horizontal distribution of features, artifacts, and ecofacts;
- 7 Natural and cultural processes, such as flooding and refuse disposal, that have influenced the initial formation of the site; and
- 8 Noncontributing buildings, structures, and objects within the site.

E Likely appearance of the site during the periods of occupation or use. Include comparisons with similar sites and districts that have informed the description.

F Current and past impacts on or immediately around the property, such as modern development, vandalism, road construction, agriculture, soil erosion, or flooding (whereas Section D7 addresses initial formation of the deposits, this section addresses known post-depositional events, activities, and formation processes).

G Previous investigations of the property, including:

- 1 Archival research and literature review;
- 2 Extent and purpose of any excavation, testing, mapping, or surface collection;
- 3 Dates of relevant research and field work, including identity of researchers and their institutional or organizational affiliation;
- 4 Important bibliographic references, including gray literature, monographs, and published accounts of fieldwork and subsequent analysis relevant to current understanding of the site and the nationally significant information it has contributed; and
- 5 Repository or repositories where excavated collections are curated.

Sites

Historic sites are typically sites or districts where the location itself has historic value and significance, independent of the presence and integrity of buildings, structures, objects, and subsurface resources on the property. As such, historic sites can be variable in their physical state. The nomination for a historic site, for example, may include a full description of both a building and an archeological site, or any other combination of property types. Any description of a historic site should consider the types of information itemized below.

A Present condition of the site and its setting, and its spatial organization.

B Other natural features that characterized the site during its period of significance, such as vegetation, topography, a body of water, or rock formations.

C Any cultural remains or other manmade evidence of the significant event or activities.

- D Type and degree of alterations to natural and cultural features since the significant event or activity, and their impact on the site's historic integrity.
- E Explanation of how the current physical environment and remains of the site reflect the period and associations for which the site is significant.

Landscapes

Landscapes significant for their design, as the place where a historic event occurred, or for their evolution over time generally are considered sites. For relatively simple landscapes, such as a small cemetery or park, the nominated resource is considered a site because the complexity of a district is lacking. In other words, the nominated small park or cemetery is the only nominated “property” according to NHL and National Register definition, although certainly it is characterized by cultural and natural features. If the landscape is part of a more complex resource, the landscape is considered a contributing site in a nominated historic district. In this case, the landscape may be accompanied by buildings, structures, and objects that are either contributing or noncontributing to the district. In either case, the landscape description should be holistic, encompassing natural and cultural components. In general, descriptions of landscapes should follow the format outlined in *National Register Bulletin 30: Guidelines for Evaluating and Documenting Rural Historic Districts*. This process is relevant to any landscape, including designed landscapes. Documenting the following landscape characteristics, as recommended in Bulletin 30, will provide a thorough landscape description:

- A Land use and activities, especially those evident from landscape features.
- B Patterns of spatial organization, particularly related to land use.
- C Responses to the natural environment, especially as influenced by natural features, physiography, and ecological communities.
- D Cultural traditions reflected in the landscape; this can include schools of design or styles of designed landscapes.
- E Circulation networks, including roads, walks, paths, railroads, and waterways.
- F Boundary demarcations, including constructed elements (walls, fences, roads) and natural features (waterways, vegetation).
- G Vegetation related to land use, such as orchards, ornamental plantings, crops, and forests or woodlots.
- H Buildings, structures, and objects that occupy the nominated parcel.
- I Clusters of development, whether a headquarters or farmstead, a village, or an industrial complex.
- J Archeological sites—especially features visually available, such as road traces, ruins, and evidence of farming or industrial processes.
- K Small-scale features, especially features that are too small to be considered an object or structure.
- L Views and vistas, especially those with particular meaning.

**FORT APACHE AND THEODORE
ROOSEVELT SCHOOL, FORT APACHE,
NAVAJO COUNTY, ARIZONA**
(DESIGNATED MARCH 2, 2012)

The Fort Apache and Theodore Roosevelt School NHL is nationally significant as a reflection of several decades of highly influential national policy targeting American Indian sovereignty, land, culture, and education. During the late nineteenth century, Fort Apache became the most important base for the recruitment and operations of Apache scouts, who gained both national and international renown, as well as a crucial node in the dynamic network of forts established in support of westward American expansion. In 1923, the Bureau of Indian Affairs inherited the post for use as the Theodore Roosevelt School. One of only fourteen forts to become a school, Fort Apache changed names, methods, and supervisors but its core mission—Indian control and assimilation—remained the same. NPS
IMAGE BY JOHN R. WELCH, NOVEMBER 2004



Architectural and Historic Districts

Architectural and historic districts encompass a single area of land containing a concentration of sites, buildings, structures, and/or objects that collectively convey a place's national significance. The description of such districts must include overall summations of the district and both descriptions of the individual resources within the district (i.e., buildings, structures, objects, and sites) and their relationship to each other in the district's overall organization.

The following items should be addressed in any description of architectural and historic district:

- A How the district is organized and an overall summation of its size, shape, setting, and environment.
- B General character of the district, such as residential, commercial, or industrial, and the types of buildings and structures, including outbuildings and bridges, found therein.
- C Natural and manmade elements comprising the district, including prominent topographical features and structures, buildings, sites, objects, and other kinds of development.
- D Architectural styles or periods represented and predominant characteristics, such as scale, proportions, materials, color, decoration, workmanship, and quality of design.
- E General physical relationship of resources to each other and to the environment, including facade lines, street plans, squares, open spaces, density of development, landscaping, principal vegetation, and important natural features—and any changes to these relationships over time. Some of this information may be provided on a sketch map.
- F Appearance of the district during the period of significance and any changes or subsequent modifications.
- G General condition of buildings, including alterations, additions, and any restoration or rehabilitation activities.
- H Identity of buildings, groups of buildings, or other resources that do and do not contribute to the district's significance. Provide a list of all resources that are

contributing or noncontributing and identify them on the sketch map submitted with the form.

I Important contributing buildings, sites, structures, and objects. Common kinds of other contributing resources.

J Qualities that distinguish the district from its surroundings.

K Presence of any archeological resources that may yield important information, plus any related paleoenvironmental data (see guidelines for describing archeological sites and districts).

L Open spaces such as parks, agricultural areas, wetlands, and forests, including vacant lots or ruins that were the site of activities important in prehistory or history.

M For industrial districts:

1 Industrial activities and processes, both historic and current, within the district; important natural and geographical features related to these processes or activities, such as waterfalls, quarries, or mines;

2 Original and other historic machinery still in place; and

3 Transportation routes within the district, such as canals, railroads, and roads, including their approximate length, width, the location of terminal points, and their integrity to the historic period.

N For rural districts:

1 Geographical and topographical features such as valleys, vistas, mountains, and bodies of water that convey a sense of cohesiveness or give the district its rural or natural characteristics;

2 Examples and types of vernacular, folk, and other architecture, including outbuildings, within the district;

3 Manmade features and relationships that form the historic and contemporary landscape, including the arrangement and character of fields, roads, irrigation systems, farm buildings, fences, bridges, earthworks, and vegetation; and

4 The historic appearance and current condition of natural features such as vegetation, principal plant materials, open space, cultivated fields, or forests.

Archeological Districts

Most archeological properties are classified either as a site or as a district. An archeological district is a grouping of sites, buildings, structures, or objects that are linked historically by function, theme, or physical development or aesthetically by plan. Descriptions of archeological districts should contain information on the period when the district was used or occupied and by whom. The description should also include changes to the environment, setting, and any subsequent impacts to the site. The character of the district itself should be detailed in a discussion of its physical characteristics, any previous investigations, and the location of any previously excavated collections.

The following items should be addressed in a description of archeological districts:

A Current environmental setting of the district and, if different, its environmental setting during the period(s) of occupation or use. Emphasize environmental

features or factors related to the location, use, formation, and preservation of the district.

- B Period(s) of time when the district is known or projected to have been occupied or used. Include comparisons with similar sites and districts that have assisted in this identification.
- C Identity of the persons, ethnic groups, and/or archeological cultures who occupied or used the area encompassed by the district. Include comparisons with similar sites and districts that have assisted in identification.
- D Physical characteristics:
 - 1 Type of district, such as a village with outlying sites, a group of quarry sites, or a historic manufacturing complex;
 - 2 Cultural, historic, or other relationships among the sites that make the district a cohesive unit;
 - 3 Kinds and number of sites, structures, buildings, or objects that make up the district;
 - 4 Noncontributing buildings, structures, sites, and objects within the district; and
 - 5 Information on individual or representative sites and resources within the district (see archeological sites section above). For small districts, describe individual sites. For large districts, describe the most representative sites individually or collectively as groups.
- E Likely appearance of the district during the period(s) of occupation or use. Include comparisons with similar sites and districts that have assisted in description.
- F Current and past impacts on or immediately around the district, such as modern development, vandalism, road construction, agriculture, soil erosion, or flooding. Describe the integrity of the district as a whole and the integrity of individual sites.
- G Previous investigations of the property, including:
 - 1 Archival research or literature review;
 - 2 Extent and purpose of any excavation, testing, mapping, or surface collection;
 - 3 Dates of relevant research and field work, including identity of researchers and their institutional or organizational affiliation;
 - 4 Important bibliographic references; and
 - 5 Repository or repositories where excavated collections are curated.

STATEMENT OF INTEGRITY

The primary purpose of the written description is to determine whether a property's essential physical features, often referred to as character-defining features, maintain the high degree of integrity necessary for NHL designation. The statement of integrity must consider each of the seven aspects of integrity as they relate to a property and, based on this analysis, provide a well-written conclusion that explains how a property retains sufficient overall integrity to be designated. If a property lacks integrity in some area, this section also must present justification supporting why the property still maintains high integrity, despite this deficiency (see Chapter 6 for a full discussion of evaluating integrity in NHL nominations).

SECTION 7 BIBLIOGRAPHICAL REFERENCES AND OTHER DOCUMENTATION

BIBLIOGRAPHY

Nomination preparers should provide the primary and secondary sources used in documenting and evaluating the property's national significance. Citations should follow the latest edition of the Chicago Manual of Style, or the Society of American Archaeology's style guide.

PREVIOUS DOCUMENTATION ON FILE (NPS)

If a property was previously listed in the National Register, mark an "X" at the appropriate location and fill in the lines numbered 1 through 6, using the information found on the property's National Register nomination form.

If a property is not listed in the National Register, fill in numbers 4, 5, and 6 based on the information recorded on the NHL nomination form. There is direct correspondence between the National Register and NHL Criteria and Exceptions:

NHL Criterion 1	corresponds to	NR Criterion A
NHL Criterion 2	corresponds to	NR Criterion B
NHL Criterion 4	corresponds to	NR Criterion C
NHL Criterion 6	corresponds to	NR Criterion D
NHL Exception 1	corresponds to	NR Consideration A
NHL Exception 2	corresponds to	NR Consideration B
NHL Exception 4	corresponds to	NR Consideration C
NHL Exception 5	corresponds to	NR Consideration D
NHL Exception 6	corresponds to	NR Consideration E
NHL Exception 7	corresponds to	NR Consideration F
NHL Exception 8	corresponds to	NR Consideration G

Mark an "X" on the appropriate line, if the property has been recognized or documented by any other listed NPS program. Mark all that apply, and applicable information.

LOCATION OF ADDITIONAL DATA

Mark an "X" in the box to indicate where most additional documentation about the property is stored. If any of this documentation was used to develop the nomination, the specific source materials must appear in the bibliography.

SECTION 8 FORM PREPARED BY

This section identifies the person(s) who prepared the form and the NHL Program staff who assisted the preparer and completed the final editing. If the NHL Program has approved the reuse of portions of National Register documentation in an NHL nomination, and the nomination preparer is not the same person who generated the National Register documentation, both persons should be listed as co-authors in this section.

PHOTOGRAPHS, MAPS, PLANS, AND HISTORIC IMAGES

PHOTOGRAPHS

Photographs submitted to the NHL Program are regarded as part of the official documentation. They must:

- be current, clear, and well-composed;
- provide an accurate visual representation of the property and its significant features; and
- illustrate the qualities discussed in the nomination, showing both significant features and resources and their current level of integrity.

A nomination should include as many photographs as needed to depict the current conditions and significant aspects of the property. Except for expansive properties with large numbers of resources, each contributing and noncontributing resource should be represented in at least one photograph. For districts, photographs representing the major building types and styles, any pivotal buildings and/or structures, representative noncontributing resources, and any important topographical or spatial elements that define the district's character are recommended. Streetscapes, landscapes, or aerial views should also be captured to illustrate the district's setting and feeling. Principal resources should be fully documented with multiple photographs that range from environmental views of the resource within its larger setting to detail views of important features. Photographs of major interior spaces of contributing buildings should also be included, and providing copies of available historic images is encouraged. All graphics must comply with Section 508, which requires alternative text describing the image.

Photographs should be submitted to the NHL Program as electronic files in full-resolution digital (TIFF) format (i.e., an individual TIFF file for each image). Nomination preparers must not embed digital photographs or other images in-line with text in the nomination, and instead insert lower resolution versions on provided photo continuation sheets. In addition, a photo log, provided in the nomination as an additional continuation sheet, must accompany the photographs. Each photograph is to be numbered, and that number must correspond to the photograph number in the photo log. All images must meet the technical requirements and guidelines presented in the National Register's Photo Policy Factsheet, which serves both the National Register and NHL Program. Please contact NHL Program staff for the most recent version.

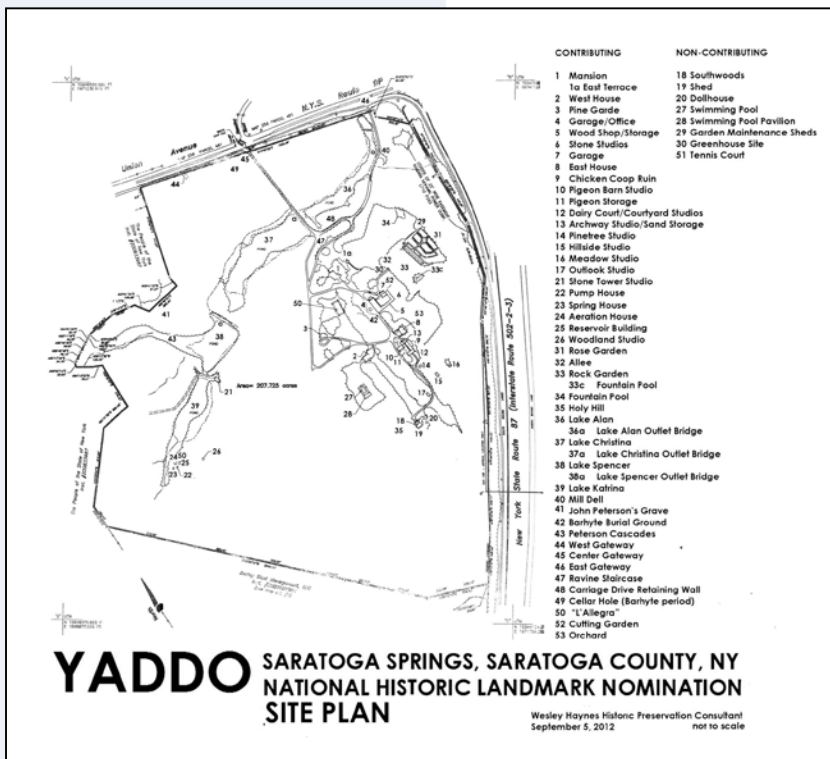
All photos submitted to the NPS in an NHL nomination become part of the public record, and the photographer grants non-exclusive permission to the NPS to use the photographs for duplication, display, distribution, publicity, presentations, and all forms of publication, including publication on the internet.

LOCATION AND BOUNDARY MAPS

A nomination requires a location map marked with the latitude/longitude coordinates (preferred) or the Universal Transverse Mercator (UTM) reference points to identify the precise geographic location of the property. These should be the same coordinates or reference points used in Section 4 of the form. Use a polygon

and its vertices to graphically illustrate the property's exact NHL boundary. The nominated property must be clearly labeled on the location map, and the property boundary instantly distinguishable from the rest of the map.

Location maps, including United States Geological Survey (USGS) maps, should be submitted in an electronic format. Any type of electronic map must include the following elements: property name, location, a north arrow, a graphic scale, datum, and its source. All maps must comply with Section 508 requirements. Location maps can be redacted, and nomination preparers should consult with NHL Program staff about whether restricting location information is an appropriate option. For current NPS guidance on electronic maps contact NHL Program staff.



SITE PLANS AND SKETCH MAPS

In addition to a location map, the nomination should graphically represent the property with the inclusion of a site plan and/or a sketch map(s) particularly for districts, properties containing a number of resources, and properties with landscape significance. Site plans do not need to be professionally prepared, however, they must be Section 508-compliant and clearly marked with:

- the NHL boundary;
- names of bordering streets and highways;
- other natural features or land uses such as fields, forests, rivers, lakes, etc.;
- a north arrow;
- a scale;
- a map key; and
- contributing and noncontributing resources keyed to their discussion in Section 6 of the nomination and/or the inventory list of contributing and noncontributing resources.

YADDO, SARATOGA SPRINGS, NEW YORK (DESIGNATED FEBRUARY 27, 2013)

Yaddo is one of the oldest artists' retreats in the nation, containing numerous residences, studios, landscapes, and support buildings. Beginning full operation in 1926, it was an incubator for interdisciplinary artistic collaborations, and provided respite, lodging, and a rich creative social environment for more than a thousand visual artists, writers, and composers. Many of these individuals shaped and imprinted American culture with a distinct national identity in the twentieth century. NPS IMAGE BY WESLEY HAYNES, HISTORIC PRESERVATION CONSULTANT, SEPTEMBER 2012

FLOOR PLANS AND HISTORIC IMAGES

The nomination should also include additional attachments:

- historic images, figures, drawings, etc.; and
- floor plans and/or construction drawings for buildings and structures. The plans should clearly illustrate any structural changes such as new or closed door or window openings and additions or removals such as interior walls, fireplaces, stairs, and porches. Floor plans can be provided as simple sketch plans and do not need to be professionally prepared.

Please be aware that images submitted to the NPS as part of an NHL nomination enter into the public domain. Photos and images currently under copyright should not be submitted or otherwise be submitted with a photo release form. Whenever possible, use of images in the public domain is recommended. Please check with an NHL staff member about historic images and copyright concerns.

NOTES

CHAPTER 1

¹ Advisory Council on Historic Preservation, “Protecting Historic Properties: A Citizen’s Guide to Section 106 Review,” (2021) 4.

² 36 CFR § 800.10, “Special Requirements for Protecting National Historic Landmarks.”

CHAPTER 2

¹ Act, August 21, 1935 (49 Stat. 666; 16 U.S.C. 461-467)

² Ibid.

³ John H. Sprinkle Jr., *Crafting Preservation Criteria: The National Register of Historic Places and American Historic Preservation* (New York: Routledge, 2014), 13.

⁴ John H. Sprinkle Jr., “Historic Preservation Was Never Static,” in *Giving Preservation a History: Histories of Historic Preservation in the United States*, ed. Randall Mason and Max Page, 369–88, 2nd ed. (New York: Routledge, 2019).

⁵ Ibid., 374–76.

⁶ Sprinkle, *Crafting Preservation Criteria*, 16.

⁷ Sprinkle, “Historic Preservation Was Never Static,” 380.

⁸ Sprinkle, *Crafting Preservation Criteria*, 17.

⁹ Barry Mackintosh, “The Historic Sites Survey and National Historic Landmarks Program: A History” (Washington, DC: National Park Service, U.S. Department of the Interior, 1985), 41.

¹⁰ Afro-American Bicentennial Corporation, “A Summary Report of Thirty Sites to Be Significant in Illustrating and Commemorating the Role of Black Americans in United States History,” December 1973, 1.

CHAPTER 3

¹ 36 CFR § 65.4, “National Historic Landmark Criteria.”

CHAPTER 4

¹ National Park Service, Park History Program, “Preamble,” in *History in the National Park Service: Themes & Concepts* (Washington, DC: National Park Service, U.S. Department of the Interior, 2000), 1.

CHAPTER 5

¹ 36 CFR § 65.4, “National Historic Landmark Criteria.”

² For more information, see: 36 CFR 60.14, “Changes and Revisions to Properties Listed in the National Register.”

³ 36 CFR § 68.2, *The Secretary of the Interior’s Standards for the Treatment of Historic Properties—Definitions*.

CHAPTER 9

¹ R. Laurie Simmons and Thomas H. Simmons “Poston Elementary School, Unit 1, Colorado River Relocation Center” National Historic Landmark Nomination (Washington, DC: U.S. Department of the Interior, National Park Service, 2012), 80.

² Ibid.

³ R. Laurie Simmons and Thomas H. Simmons, “Denver Civic Center” National Historic Landmark Nomination (Washington, DC: U.S. Department of the Interior, National Park Service, 2012), 124.

⁴ Ibid.

⁵ Delia Hagen, Ann Emmons, Janene Caywood, and Geoff Cunfer, “Frederick A. and Sophia Baggett Bonanza Farm” National Historic Landmark Nomination (Washington, DC: U.S. Department of the Interior, National Park Service, 2005), 80.

⁶ Ibid.

⁷ UNESCO-ICOMOS Documentation Centre, *World Heritage Cultural Landscapes* (September 2011).

⁸ National Register of Historic Places, *National Register Bulletin: Identifying, Evaluating, and Documenting Traditional Cultural Places*, (Washington, DC: U.S. Department of the Interior, National Park Service, forthcoming 2024).

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- . “National Historic Landmarks Program.” <https://www.nps.gov/subjects/nationalhistoriclandmarks/index.htm>
- . “National Park System Advisory Board.” <https://www.nps.gov/resources/advisoryboard.htm>.
- . “National Register of Historic Places.” <https://www.nps.gov/subjects/nationalregister/index.htm>
- . “Technical Preservation Services: The Secretary of the Interior’s Standards.” <https://www.nps.gov/orgs/1739/secretary-standards-treatment-historic-properties.htm>
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- . *National Register Bulletin 30: Guidelines for Evaluating and Documenting Rural Historic Landscapes*. Washington, DC: U.S. Department of the Interior, National Park Service, 1999.
- . *National Register Bulletin: Identifying, Evaluating, and Documenting Traditional Cultural Places*. Washington, DC: U.S. Department of the Interior, National Park Service, forthcoming 2024.
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BACK COVER PHOTOGRAPHS

TOP / FROM LEFT

Wilson Dam, Colbert and
Lauderdale Counties, Alabama
SEE PAGE 100

USS Slater, Albany, New York
SEE PAGE 28

Freedom Tower, Miami, Florida
SEE PAGE 43

Edmund Pettus Bridge,
Selma, Alabama
SEE PAGE 56

Portland Observatory,
Portland, Maine
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BOTTOM / FROM LEFT

Frederick A. and Sophia Bagg
Bonanza Farm, Richland County,
North Dakota
SEE PAGE 97

Field House and new museum/
visitor center, St. Louis, Missouri
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Arch Street Friends Meeting
House, Philadelphia, Pennsylvania
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First Peoples Buffalo Jump,
Cascade County, Montana
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National Park Service
U.S. Department of the Interior
National Historic Landmarks Program

2023

